

Lake Metropolitan Housing Authority

Proposed changes- 2023 Administrative Plan

<u>Chapter</u>	<u>Section & Title</u>	<u>Comments</u>	<u>Proposed Language</u>
Intro		Formatting and minor edits, no policy change	
1 Overview		Formatting and minor edits, no policy change	
2 Fair Housing	2-II.E. Approval/Denial of a Requested Accommodation	<p>Language added to incorporate DOJ & HUD guidance on handling RA requests.</p> <p>Not included by Nan McKay - added right to appeal to language to denials for not being reasonable to maintain consistency in how denials of accommodations are treated</p>	<p><i>If the PHA denies a request for an accommodation because there is no relationship, or nexus, found between the disability and the requested accommodation, the notice will inform the family of the right to appeal the PHA's decision through an informal review (if applicable) or informal hearing (see Chapter 16).</i></p> <p>If the PHA believes that the family has failed to identify a reasonable alternative accommodation after interactive discussion and negotiation, the PHA will notify the family, orally or in writing, of its determination within 10 business days from the date of the most recent discussion or communication with the family. <i>The notice will inform the family of the right to appeal the PHA's decision through an informal review (if applicable) or informal hearing (see Chapter 16).</i></p>

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	2-III.B. Oral Interpretation	Must ensure meaningful access to programs for people with LEP. These additions are included as part of HUD guidance of affirmative steps to ensure LEP compliance. Notice 2020-32 stated a preference of video interpretation services if briefings informal hearings/reviews are conducted remotely	below
<p><i>The PHA will utilize a language line for telephone interpreter services.</i></p> <p><i>When exercising the option to conduct remote briefings, informal reviews, or hearings, however, the PHA will coordinate with a remote interpretation service which, when available, uses video conferencing technology rather than voice-only interpretation.</i></p> <p>Where LEP persons desire, they will be permitted to use, at their own expense, an interpreter of their own choosing, in place of or as a supplement to the free language services offered by the PHA. <i>The PHA, at its discretion, may choose to use the language services even when LEP persons desire to use an interpreter of their choosing.</i> The interpreter may be a family member or friend. <i>If the interpreter chosen by the family is a minor, the PHA will not rely on the minor to serve as the interpreter.</i></p> <p>The PHA will analyze the various kinds of contacts it has with the public, to assess language needs and decide what reasonable steps should be taken. “Reasonable steps” may not be reasonable where the costs imposed substantially exceed the benefits.</p> <p>Where feasible and possible, according to its language assistance plan (LAP), the PHA will train and hire bilingual staff to be available to act as interpreters and translators, will pool resources with other PHAs, and will standardize documents.</p>			
3 Eligibility	Introduction	No policy change, puts requirement in writing	The applicant family must: - <i>Not currently be receiving a duplicative subsidy</i>
	3-I.B. Family and Household	Definition update per 87 Fed. Reg. 3570 (January 24, 2022)	Family To be eligible for assistance, an applicant must qualify as a family. Family as defined by HUD includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status, a single person, who may be an elderly person, disabled person, near-elderly person, <i>displaced person, remaining member of a tenant family, youth as described in 42 U.S.C. 1437f(x)(2)(B)</i> , or any other single person; or a group of persons residing together.

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	3-I.L. Absent Family Members	Clarification, no policy change	Family Members Permanently Confined for Medical Reasons <i>An individual confined to a nursing home or hospital on a permanent basis is not considered a family member.</i>
	3-II.D. Family Consent to Release of Information	Clarification, no policy change	HUD requires each adult family member, and the head of household, spouse, or cohead, regardless of age, to sign form HUD-9886, Authorization for the Release of Information/Privacy Act Notice, <i>the form HUD-52675 Debts Owed to Public Housing Agencies and Terminations</i> , and other consent forms as needed
	3-II.F. EIV System Searches	Policy addition, we already do this in practice	below
<p>3-II.F. EIV SYSTEM SEARCHES [Notice PIH 2018-18; EIV FAQs; EIV System Training 9/30/20]</p> <p><i>Existing Tenant Search</i></p> <p><i>Prior to admission to the program, the PHA must search for all household members using the EIV Existing Tenant Search module. The PHA must review the reports for any SSA matches involving another PHA or a multifamily entity and follow up on any issues identified. The PHA must provide the family with a copy of the Existing Tenant Search results if requested. At no time may any family member receive duplicative assistance.</i></p> <p><i>If the tenant is a new admission to the PHA, and a match is identified at a multifamily property, the PHA must report the program admission date to the multifamily property and document the notification in the tenant file. The family must provide documentation of move-out from the assisted unit, as applicable.</i></p> <p style="padding-left: 40px;"><u>Lake MHA Policy</u></p> <p style="padding-left: 40px;"><i>The PHA will contact the PHA or owner identified in the report to confirm that the family has moved out of the unit and obtain documentation of current tenancy status, including a form HUD-50058 or 50059, as applicable, showing an end of participation. The PHA will only approve assistance contingent upon the move-out from the currently occupied assisted unit.</i></p> <p><i>Debts Owed to PHAs and Terminations</i></p> <p><i>All adult household members must sign the form HUD-52675 Debts Owed to Public Housing and Terminations. Prior to admission to the program, the PHA must search for each adult family member in the Debts Owed to PHAs and Terminations module.</i></p> <p><i>If a current or former tenant disputes the information in the module, the tenant should contact the PHA directly in writing to dispute the information and provide any documentation that supports the dispute. If the PHA determines that the disputed information is incorrect, the PHA will update or delete the record from EIV. Former tenants may dispute debt and termination information for a period of up to three years from the end of participation date in the program.</i></p>			

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	<p><u>Lake MHA Policy</u></p> <p><i>The PHA will require each adult household member to sign the form HUD-52675 once at the eligibility determination. Any new members added to the household after admission will be required to sign the form HUD-52675 prior to being added to the household.</i></p> <p><i>The PHA will search the Debts Owed to PHAs and Terminations module as part of the eligibility determination for new households and as part of the screening process for any household members added after the household is admitted to the program. If any information on debts or terminations is returned by the search, the PHA will determine if this information warrants a denial in accordance with the policies in Part III of this chapter.</i></p> <p>Income and Income Validation Tool (IVT) Reports</p> <p><i>For each new admission, the PHA is required to review the EIV Income and IVT Reports to confirm and validate family reported income within 120 days of the IMS/PIC submission date of the new admission. The PHA must print and maintain copies of the EIV Income and IVT reports in the tenant file and resolve any discrepancies with the family within 60 days of the EIV Income or IVT report dates.</i></p>		
	3-III.B & C Mandatory Reasons for Denial & Permitted Reasons for Denial	Removal of wording that convictions hold more weight than arrests	
	3-III.C Permitted Reasons for Denial		<p>Previous Behavior in Assisted Housing [24 CFR 982.552(c)]</p> <p>PHAs are not permitted to deny assistance to a family because the family previously failed to meet its obligations under the Family Self-Sufficiency (FSS) program [24 CFR 984.101(d)].</p> <p><u>PHA Policy</u></p> <p>The PHA will deny assistance to an applicant family if:</p> <p>When denying admission due to family debts as shown in HUD’s EIV system, the PHA will provide the family with a copy of the EIV Debt Owed to PHA and Termination report.</p> <p>If the family wishes to dispute the information in the report, the family must contact the PHA that entered the information in EIV in writing, explaining why EIV information is disputed. The family must also provide a copy of the letter and all applicable verification to the PHA to support the family’s claim. The PHA will consider the information provided by the family prior to issuing a notice of denial.</p>

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4 Applications, Waiting List, Tenant Selection	4-II.B. Organization of the Waiting List	RAD Notice 2019-09 Choice Mobility requirements	<p><u>Lake MHA Policy</u></p> <p><i>The PHA will maintain a single waiting list for the HCV program except for two circumstances. First, when Lake MHA is preparing for a new waiting list and in the process of exhausting an existing waiting list. In this circumstance, no applicants will be pulled from the new waiting list until all of the applicants from the existing waiting list have been selected. The only exception would be if Lake MHA receives an additional allocation of vouchers targeted for a specific segment for future clients. At that time, identified applicants will be solicited from the targeted segment for issuance of the new voucher.</i></p> <p><i>Second, when a Lake MHA’s Multifamily RAD PBRA tenant wishes to exercise their Choice-Mobility option. Lake MHA will operate a separate waiting list for Multifamily tenants who wish to exercise their right to request a Choice-Mobility voucher as provided under HUD’s RAD Notice H-2019-09. Once an eligible Multifamily tenant makes a Choice-Mobility request, Lake MHA will determine whether the tenant family meets all the eligibility and screening requirements for the HCV Program and, if eligible, will issue the family a voucher if one is available. If a housing choice voucher is not immediately available, Lake MHA will give the family priority to receive the next available opportunity for a housing choice voucher by placing the tenant on the Choice-Mobility Waiting List in the order in which their request was received by Lake MHA. Additional information about the Choice-Mobility option can be found in Lake MHA’s Tenant Selection Plan.</i></p>
5 Briefings and Voucher Issuance	5-I.B. Briefings	Provides more discretion and opportunity for choice in briefing delivery. Remote capabilities should follow Notice 2020-32 – family get information and documents in advance	below
<p>Notification of Briefing</p> <p>Prior to issuance of a voucher, the PHA must give the family an oral briefing and provide the family with a briefing packet containing written information about the program. Families may be briefed in individual face-to-face meetings, through group briefing sessions, or via remote briefing sessions.</p> <p style="text-align: center;"><u>Lake MHA Policy</u></p>			

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			<p><i>Prior to issuance of the voucher but after the application/eligibility interview, families will be notified of their preliminary eligibility for assistance, in accordance with Chapter 3, Parts I and II, at the time they are invited to a briefing. The notice will be sent by first class mail and/or by email, if the family has provided a valid email address to the PHA.</i></p> <p><i>The notice will advise the family of the type of briefing, who is required to be present at the briefing, and the date and time of the briefing. The notice will also inform the family of the requirement to complete screening for admission in accordance with Chapter 3, Part III, if not yet complete, and any additional requirements for in-person or remote briefings as addressed in relevant policy elsewhere in this section.</i></p> <p><i>If the notice is returned by the post office with no forwarding address, the applicant will be denied and their name will not be placed back on the waiting list. If the notice is returned by the post office with a forwarding address, the notice will be resent to the address indicated.</i></p> <p>In-Person Briefings</p> <p>At the briefing, the PHA must ensure effective communication in accordance with Section 504 requirements (Section 504 of the Rehabilitation Act of 1973) and ensure that the briefing site is accessible to individuals with disabilities. For a more thorough discussion of accessibility requirements, refer to Chapter 2.</p> <p><u>Lake MHA Policy</u></p> <p>In-person briefings will generally be conducted in group meetings. At the family’s written request, the PHA may provide an individual briefing.</p> <p>Generally, the head of household is required to attend the briefing. If the head of household is unable to attend, the PHA may approve another adult family member to attend the briefing.</p> <p>Families that attend group briefings and still need individual assistance will be referred to an appropriate PHA staff person.</p> <p>Briefings will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide interpretation services in accordance with the PHA’s LEP plan (See Chapter 2).</p> <p>Attendance</p> <p><u>Lake MHA Policy</u></p> <p>Applicants who fail to attend a scheduled in-person briefing will be scheduled for another briefing automatically. The PHA will notify the family of the date and time of the second scheduled briefing. Applicants who fail to attend two scheduled briefings, without prior PHA approval, will be denied assistance (see Chapter 3).</p> <p><i>Remote Briefings [Notice PIH 2020-32]</i></p> <p><i>Remote briefings may be conducted over the phone, via video conferencing, or through other virtual platforms.</i></p> <p><u>Lake MHA Policy</u></p>

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			<p><i>The PHA has the sole discretion to require that briefings be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster. If the PHA schedules a remote briefing, the PHA will conduct a face-to-face briefing upon request of the applicant as a reasonable accommodation for a person with a disability if safety and health concerns can be reasonably addressed.</i></p> <p><i>In addition, the PHA will conduct a briefing remotely upon request of the applicant as a reasonable accommodation for a person with a disability, if an applicant does not have child care or transportation that would enable them to attend the briefing, or if the applicant believes an in-person briefing would create an undue health risk. The PHA will consider other reasonable requests for a remote briefing on a case-by-case basis.</i></p> <p><i>Accessibility Requirements for Persons with Disabilities and LEP Individuals</i></p> <p><i>As with in-person briefings, the platform for conducting remote briefings must be accessible and the briefing conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio description, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support, and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual.</i></p> <p><i>If no method of conducting a remote briefing is available that appropriately accommodates an individual’s disability, the PHA may not hold against the individual his or her inability to participate in the remote briefing, and the PHA should consider whether postponing the remote briefing to a later date is appropriate or whether there is a suitable alternative.</i></p> <p><i>Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation, will depend on the specific circumstances.</i></p> <p><i>Limited English Proficiency (LEP) requirements also apply to remote briefings, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote briefings.</i></p> <p><i>Conducting Remote Briefings</i></p> <p><i>The PHA must ensure that the lack of technology or inability to use technology for remote briefings does not pose a disadvantage to families that may not be apparent to the PHA. The PHA must ensure that the family has appropriate technological access in order to fully participate in the remote briefing.</i></p> <p><u><i>Lake MHA Policy</i></u></p> <p><i>At least 10 business days prior to scheduling the remote briefing, the PHA will provide written notification via first class mail and/or email to families participating in the briefing to advise of technological requirements and to request the family notify the PHA of any known barriers. If any family does not respond within five business days, or if the written notification is returned by the post office or the email is rejected, the PHA will contact the family by telephone to identify potential technological barriers and to determine which technology resources are accessible to the family. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person briefing or have a one-on-one briefing over the phone, as appropriate.</i></p>

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			<p><i>The PHA will conduct remote briefings via a video conferencing platform when available. If applicants are unable to adequately access the video conferencing platform, the briefing will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in, the remote briefing will be postponed, and an in-person alternative or one-on-one briefing over the phone will be provided.</i></p> <p><i>The PHA will provide login information and/or conferencing call-in information and an electronic copy of the briefing packet via email at least five business days before the briefing. The PHA will provide a paper copy of the briefing packet upon family request, and may reschedule the briefing to allow adequate time for the family to receive the physical briefing packet.</i></p> <p><i>The PHA will ensure that all electronic information stored or transmitted as part of the briefing meets the requirements for accessibility for persons with disabilities and persons with LEP, and is secure, including ensuring personally identifiable information (PII) is protected.</i></p> <p><i>The PHA will ensure that families who participate in remote briefings have the opportunity to ask questions as part of the briefing.</i></p> <p><i>If families lose connectivity during any remote briefing or otherwise feel they were unable to access information presented during the briefing, the family may request a one-on-one briefing over the phone or in person with the PHA.</i></p> <p>Briefing packet – minor updates</p>
6 Income and Subsidy Determinations	6-III.C. Applying Payment Standards	Minor typo correction and heading change, no policy change	Changes in Family Unit Size (<i>Voucher Size</i>)
7 Verification	7-I.B. Overview of Verification Requirements 7-I.E. Self-Certification 7-II.A. Verification of Legal Identity		<p>Requirements for Acceptable Documents</p> <p>Any family self-certifications must be made in a format acceptable to the PHA and must be signed by the family member whose information or status is being verified.</p> <p>Removal of self cert requirement of signed in presence of PHA rep or notary</p>
8 HQS and Rent Reasonableness	8-I.C. Life-Threatening Conditions	Updated per NMA best practice and federal register notice 1/18/17	below
	The following are considered life-threatening conditions:		

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		<p>Any condition that jeopardizes the security of the unit</p> <p>Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling</p> <p>Natural or LP gas or fuel oil leaks A fuel storage vessel, fluid line, valve, or connection that supplies fuel to a HVAC unit is leaking or a strong odor is detected with potential for explosion or fire or that results in a health risk if inhaled</p> <p>Any electrical problem or condition that could result in shock or fire A light fixture is readily accessible, is not securely mounted to the ceiling or wall, and electrical connections or wires are exposed A light fixture is hanging by its wires A light fixture has a missing or broken bulb, and the open socket is readily accessible to the tenant during the day-to-day use of the unit A receptacle (outlet) or switch is missing or broken and electrical connections or wires are exposed An open circuit breaker position is not appropriately blanked off in a panel board, main panel board, or other electrical box that contains circuit breakers or fuses A cover is missing from any electrical device box, panel box, switch gear box, control panel, etc., and there are exposed electrical connections Any nicks, abrasions, or fraying of the insulation that exposes conducting wire Exposed bare wires or electrical connections Any condition that results in openings in electrical panels or electrical control device enclosures Water leaking or ponding near any electrical device Any condition that poses a serious risk of electrocution or fire and poses an immediate life-threatening condition</p> <p>Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit.</p> <p>Utilities not in service, including no running hot water</p> <p>Conditions that present the imminent possibility of injury</p> <p>Obstacles that prevent safe entrance or exit from the unit Any components that affect the function of the fire escape are missing or damaged Stored items or other barriers restrict or prevent the use of the fire escape in the event of an emergency The building's emergency exit is blocked or impeded, thus limiting the ability of occupants to exit in a fire or other emergency</p> <p>Absence of a functioning toilet in the unit</p>	

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			<p><i>Inoperable or missing smoke detectors</i></p> <p><i>Missing or inoperable carbon monoxide detector</i></p> <p><i>Missing, damaged, discharged, overcharged, or expired fire extinguisher (where required)</i></p> <p><i>Gas/oil-fired water heater or heating, ventilation, or cooling system with missing, damaged, improper, or misaligned chimney venting</i></p> <p style="padding-left: 20px;"><i>The chimney or venting system on a fuel-fired water heater is misaligned, negatively pitched, or damaged, which may cause improper or dangerous venting or gases</i></p> <p style="padding-left: 20px;"><i>A gas dryer vent is missing, damaged, or is visually determined to be inoperable, or the dryer exhaust is not vented to the outside</i></p> <p style="padding-left: 20px;"><i>A fuel-fired space heater is not properly vented or lacks available combustion air</i></p> <p style="padding-left: 20px;"><i>A non-vented space heater is present</i></p> <p style="padding-left: 20px;"><i>Safety devices on a fuel-fired space heater are missing or damaged</i></p> <p style="padding-left: 20px;"><i>The chimney or venting system on a fuel-fired heating, ventilation, or cooling system is misaligned, negatively pitched, or damaged, which may cause improper or dangerous venting of gas</i></p> <p><i>Deteriorating paint as defined at 24 CFR 35.110 in a unit built before 1978 that is to be occupied by a family with a child under six years of age if it would prevent the family from moving into the unit</i></p> <p>If an owner fails to correct life-threatening conditions as required by the PHA, the PHA will enforce the HQS in accordance with HUD requirements. See 8-II-G.</p> <p>If a family fails to correct a family-caused life-threatening condition as required by the PHA, the PHA will enforce the family obligations. See 8-II.H.</p> <p><i>The owner will be required to repair an inoperable smoke detector unless the PHA 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.</i></p>

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	8-II.A. Overview	Chose no RVI as previously discussed – can always change in the future	
	<p><i>Use of Photos in HQS Inspections [Notice PIH 2013-17]</i></p> <p><u>Lake MHA Policy</u></p> <p><i>Lake MHA will take and use photos for all types of inspections. For initial, annual, biennial, or quality control inspections, photos will be taken by the HQS inspector and used in concert with the inspection form to document the overall quality of the HCV unit and any specific HQS deficiencies identified on the inspection form.</i></p> <p><i>Except for cases where the unit does not pass HQS pursuant to the inspection for initial occupancy, Lake MHA may allow owners to submit photos of repairs of specific deficiencies to verify that those deficiencies have been corrected properly, in lieu of re-inspection. Photos may be used in this manner when the deficiencies and subsequent repairs can be easily and clearly identified, such as defects in electrical hazards or tangible items that pose a safety risk to unit occupants.</i></p> <p><i>Photos taken and/or used in concert with inspections or verifications of deficiency corrections will be kept in the family’s file, attached to the corresponding HQS inspection report. Photos taken or used in accordance with this section will remain secure and be used only by staff or others needing access for purposes of the HQS inspection process.</i></p> <p><i>Remote Video Inspections (RVIs) [Notice PIH 2020-31]</i></p> <p><i>As an alternative to some or all on-site inspections, the PHA may, but is not required to, perform HQS inspections from a remote location using video streaming technology and a proxy at the inspection site. Since there may be some circumstances in which the application of technology provides insufficient information or evidence to allow the PHA to make appropriate determinations about whether a condition violates HQS, Notice PIH 2020-31 requires that if a PHA chooses to implement RVIs, the PHA should have policies and procedures in place to address such limitations.</i></p> <p><u>Lake MHA Policy</u></p> <p><i>The PHA will not conduct any HQS inspection using RVI.</i></p>		

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	<p>Notice and Scheduling</p> <p>The family must allow the PHA to inspect the unit at reasonable times with reasonable notice [24 CFR 982.551(d)].</p> <p><u>Lake MHA Policy</u></p> <p>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 5 five business days. Inspections may be scheduled between 8:00 a.m. and 5:00 p.m. Generally, inspections will be conducted on business days only but may be scheduled on weekends at the discretion of Lake MHA. In the case of a life-threatening emergency, the PHA will provide the required 24 hour notice by contacting the owner and the tenant via telephone and/or notice delivery detailing the violations and <i>scheduling the any required re-inspection, or detailing the process for owner verification of correction of deficiencies by the use of photos, if applicable.</i> The PHA will follow up with a copy of the notice in the mail/faxed/scanned for confirmation and keep a copy in the file.</p>		
	8-II.E. Quality Control Inspections	<p>Adds the SEMAP regulation 24 CFR 985.3(e) and language is limited to SEMAP reg language</p> <p>Removes - The selected sample will include (1) each type of inspection (initial, annual, and special), (2) inspections completed by each inspector, and (3) units from a cross-section of neighborhoods.</p>	<p>The unit sample must include only units that have been inspected within the preceding three months. <i>The selected sample should be drawn to represent a cross section of neighborhoods and the work of a cross section of inspectors.</i></p>
	8-II.F. Inspection Results and Re-Inspections for Units under HAP Contract	<p>PIH Notice update, inclusion of wording to maintain consistency with new section on use of photos in inspections</p>	<p>below</p>

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			<p>Notification of Corrective Actions</p> <p>The owner and the family will be notified in writing of the results of all inspections. When an inspection identifies HQS failures, the PHA will determine (1) whether or not the failure is a life-threatening condition and (2) whether the family or owner is responsible.</p> <p><u>Lake MHA Policy</u></p> <p>When life-threatening conditions are identified, the PHA 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 PHA’s notice. <i>The PHA will re-inspect the life-threatening conditions within 24 hours to ensure repairs have been made to satisfy HQS compliance or will allow owners to submit photos of repairs to the life-threatening conditions, if the deficiencies and repairs can be easily and clearly identified as determined by the PHA, within 24 hours to verify and ensure that those repairs have been made to satisfy HQS compliance.</i></p> <p>Extensions</p> <p><u>Lake MHA Policy</u></p> <p><i>Generally, the following will be required for an extension to be approved:</i></p> <ul style="list-style-type: none"> • <i>The responsible party must request an extension in writing at least 24hrs prior to the 1st re-inspection or photo verification of correction date</i> <p>Re-inspections</p> <p><u>Lake MHA Policy</u></p> <p>The PHA will conduct a re-inspection <i>or allow owners to submit photos of repairs if the deficiencies and repairs can be easily and clearly identified, as determined by the PHA</i>, to ensure deficiencies have been corrected by the due date. The family and owner will be given written notification of the re-inspection appointment <i>or the owners ability to submit photos of repairs, as applicable, at least 5 days prior to the inspection or correction due date.</i> If the deficiencies have not been corrected by the time of the re-inspection <i>or repairs verified by photograph by the correction due date, as applicable,</i> the PHA will abate the unit beginning the day following the failed re-inspection <i>or failed photo verification of correction.</i> The PHA will send notice of abatement to the owner, or in the case of family caused violations, a notice of termination to the family, in accordance with PHA policies.</p> <p>If the PHA is unable to gain entry to the unit in order to conduct the <i>any</i> scheduled re-inspection <i>or the family does not allow the owner entry to take photos for verification of repairs, if applicable,</i> the PHA will contact the family and <i>either schedule the re-inspection or extend the photo verification correction date to within the next 5 days.</i> If the family does not submit to the re-inspection <i>or allow the owner entry to take photos,</i> the family will be considered to have violated its obligation to make the unit available for inspection and will be proposed for termination from the program in accordance with Chapter 12.</p>

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	8-II.G. Enforcing Owner Compliance	Maintaining consistency with photo verification	<p>HAP Abatement <u>Lake MHA Policy</u> The PHA will make all HAP abatements effective the first day following the failed 1st re-inspection <i>or photo verification correction date.</i></p> <p>HAP Contract Termination <u>Lake MHA Policy</u> <i>Where re-inspection is required by the PHA, a second re-inspection will be scheduled to occur 25-30 days after the first failed re-inspection.</i></p> <p><i>Where photo verification of correction of any deficiency is permitted by the PHA, a second photo verification correction date will be given for 25-30 days after the first failed photo verification of correction. A voucher will be issued if the unit fails the second photo verification of correction, but the PHA reserves the right to issue a voucher to the tenant if the PHA receives information that the landlord will not make the repairs. The maximum length of time that HAP may be abated before the contract is terminated is 60 days. If the owner has not notified the PHA that corrections have been made before the 60 days has expired, the unit will be terminated. However, if the owner completes corrections and notifies the PHA before the termination date of the HAP contract, the PHA 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 the photo verification of correction.</i></p>
	8-III.C. How Comparability is Established	Minor edits and PIH Notice update	

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9 Leasing	9-I.B. Requesting Tenancy Approval	Included in NMA option 1	below
	<p><u>Lake MHA</u> The RFTA must be signed by both the family and the owner. <i>The owner may submit the RFTA on behalf of the family.</i> Completed RFTA (including the proposed dwelling lease) must be submitted as hard copies, in-person, <i>by mail, by email, or by fax.</i> The family may not submit, and the PHA will not process, more than one (1) RFTA at a time. When the family submits the RFTA, the PHA will review the RFTA for completeness. If the RFTA is incomplete (including lack of signature by family, owner, or both), or if the dwelling lease is not submitted with the RFTA, the PHA will notify the family and the owner of the deficiencies. Missing information and/or missing documents will only be accepted as hard copies, in-person, <i>by mail, by email, or by fax.</i> The PHA will not accept missing information over the phone. When the family submits the RFTA and proposed lease, the PHA will also review the terms of the RFTA for consistency with the terms of the proposed lease. If the terms of the RFTA are not consistent with the terms of the proposed lease, the PHA will notify the family and/or owner of the discrepancies. Corrections to the terms of the RFTA and/or the proposed lease will only be accepted as hard copies, in-person, <i>by mail, by email, or by fax.</i> The PHA will not accept corrections by phone. The PHA will accept corrections to existing, executed HAP contracts, RFTAs, leases, and lease addendums as hard copies, in person, <i>by mail, by email, or by fax</i> in order to correct errors in the file.</p>		
10 Moving & Portability	10-I.C.	Clarify that the PHA will not enter into zero HAP contracts with any	<p>Zero HAP Families [24 CFR 982.455] A participant who is not receiving any subsidy, but whose HAP contract is still in force, may request a voucher to move to a different unit. The PHA must issue a voucher to move unless it has grounds to deny assistance under the program regulations. However, if the PHA determines no subsidy would be paid at the new unit, the PHA may refuse to enter into a HAP contract on behalf of the family.</p> <p style="text-align: center;"><u>Lake MHA Policy</u> <i>If no subsidy will be paid at the unit to which any participant family requests to move, the PHA will not enter into a HAP contract on behalf of the family for the new unit.</i></p>
	10-II.B Initial PHA Role		<p style="text-align: center;"><u>Initial Billings Deadline</u> <u>Lake MHA Policy</u></p>

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			<p>The initial PHA’s decision as to whether to accept late billing will be based on internal PHA factors, including the initial PHA’s leasing or funding status. If the PHA has not received an initial billing notice from the receiving PHA within the billing deadline and does not intend to honor the late billing, it will contact the receiving PHA to inform them that it will not honor a late billing submission and will return any subsequent billings that it receives on behalf of the family. In this case, the PHA will send the receiving PHA a written confirmation of its decision by mail.</p> <p>Among other considerations as to whether to accept late billings will be if the family includes a person with disabilities and the late billing is a result of a reasonable accommodation granted to the family by the receiving PHA.</p>
11 Reexaminations	11-II.B. Changes in Family and Household Composition	Language clarification	<p>New Family and Household Members Requiring Approval Although the PHA must verify aspects of program eligibility when any new family member is added, the Streamlining Final Rule removed the requirement that PHAs conduct a reexamination of income whenever a new family member is added. The PHA may state in policy that an income reexamination will be conducted.</p>
12 Terminations	12-I.E Mandatory Policies and Other Authorized Terminations		<p>Insufficient Funding If the PHA must terminate HAP contracts due to insufficient funding, the PHA will do so in accordance with the following criteria and instructions: Families who have been assisted in the HCV program the longest will be the first to be terminated, excluding families that include elderly or disabled family members.</p>
13 Owners	13-I.A. Owner Recruitment and Retention		<p>Incentives As specified in Notice PIH 2022-18, PHAs may use administrative fee funding for both administrative and “other expenses” needed to employ strategies and undertake activities beyond regular administrative responsibilities to facilitate the successful leasing and use of housing choice vouchers by families, such as through the use of security deposit assistance and landlord recruitment and incentive payments, among other allowable expenses. PHAs are also permitted to use unrestricted net position (UNP) for these expenses [Notice PIH 2022-18]. Incentives are available until funds are exhausted. <u>Lake MHA Policy</u></p>

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			<p>Lake MHA has decided to employ two landlord recruitment and incentive payments to help facilitate the successful leasing and use of housing choice vouchers by families.</p> <p style="padding-left: 40px;">(1) New Landlord Incentive</p> <p>Lake MHA will offer a one-time incentive signing bonus of \$1,000.00 to new landlords, upon the execution of a new HAP contract for a tenant-based HCV participant. The HAP contract must be effective on or after July 1, 2023. A “new landlord” is defined as “a landlord who has not rented to any tenant-based voucher participant within the past twelve (12) months.” This incentive payment is not available for existing landlords or HAP contracts executed for unit transfers, lease renewals, or lease changes.</p> <p style="padding-left: 40px;">(2) Damage Mitigation Reimbursement Incentive</p> <p>Landlords who have an HCV participant vacate a unit on or after July 1, 2023, are eligible to apply for damage mitigation reimbursement funds if certain conditions apply. The landlord will be eligible to receive up to \$1,500.00 per unit in reimbursement of costs when HCV participant’s tenancy ends and there is tenant-caused damage (above and beyond normal wear and tear) to the unit in excess of the security deposit collected by the landlord. The reimbursement is intended to assist the landlord with recovery of cost for damages that exceed the security deposit. To justify the reimbursement, Lake MHA will require:</p> <ul style="list-style-type: none"> • Landlord must have conducted a separate non-HQS inspection of the unit within the past 12 months. Certification of this inspection date is required. • Landlord letter to HCV participant regarding the status of the security deposit balance with an itemized list of damages and out-of-pocket/repair estimate documentation. The letter to the participant must be dated within thirty (30) days of the participant vacating the unit. • Pictures of the damages. <p>The Landlord must apply for the damage mitigation reimbursement within sixty (60) days of the end of the HCV participant’s tenancy.</p>
	13-I.D. Owner Qualifications		<p>Conflict of Interest</p> <p>Such “covered individual” may not have any direct or indirect interest in the HAP contract or in any benefits or payments under the contract (including the interest of an immediate family member of such covered individual) while such person is a covered individual or for one year thereafter.</p> <p style="padding-left: 40px;"><i>Immediate family member</i> means the spouse, parent (including a stepparent), child (including a stepchild), grandparent, grandchild, sister, or brother (including a stepsister or stepbrother) of any covered individual.</p>

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			Owner Actions That May Result in Disapproval of a Tenancy Request [24 CFR 982.306(c)]
14 Program Integrity		formatting, no policy change	
15 Special Housing		New Guidebook language and clarifications	Whole chapter contains updated language based on model policy – no policy decisions
16 Program Administration	16-III.B. Informal Reviews	Clarifies PHA discretion in using remote informal reviews and need to notify of accessibility/technology. To align with PIH Notice 2020-32	below
	<p>Scheduling an Informal Review</p> <p><i>If the informal review will be conducted remotely, at the time the PHA notifies the family of the informal review, the family will be informed:</i></p> <p style="padding-left: 40px;"><i>Regarding the processes to conduct a remote informal review;</i></p> <p style="padding-left: 40px;"><i>That, if needed, the PHA will provide technical assistance prior to and during the informal review; and</i></p> <p style="padding-left: 40px;"><i>That if the family or any individual witness has any technological, resource, or accessibility barriers preventing them from fully accessing the remote informal review, the family may inform the PHA and the PHA will assist the family in either resolving the issues or allow the family to participate in an in-person informal review, as appropriate.</i></p> <p>Remote Informal Reviews</p> <p><i>There is no requirement that informal reviews be conducted in-person and, as such, HUD allows PHAs to conduct all or a portion of their informal review remotely either over the phone, via video conferencing, or through other virtual platforms. If the PHA chooses to conduct remote informal reviews, applicants may still request an in-person informal review, as applicable.</i></p> <p>Ensuring Accessibility for Persons with Disabilities and LEP Individuals</p> <p><i>As with in-person informal reviews, the platform for conducting remote informal reviews must be accessible to persons with disabilities and the informal review must be conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as</i></p>		

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			<p><i>audio description, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support, and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual. PHAs may never request or require that individuals with disabilities provide their own auxiliary aids or services, including for remote informal hearings.</i></p> <p><i>PHAs are required to make reasonable accommodations in policies, practices, and procedures to ensure persons with disabilities have a full and equal opportunity to participate in and benefit from all aspects of the informal review process. See Chapter 2 for a more detailed discussion of reasonable accommodation requirements.</i></p> <p><i>If no method of conducting a remote informal review is available that appropriately accommodates an individual's disability, the PHA may not hold against the individual his or her inability to participate in the remote informal review, and the PHA should consider whether postponing the remote informal review to a later date is appropriate or whether there is a suitable alternative.</i></p> <p><i>Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation, will depend on the specific circumstances and requirements.</i></p> <p><i>As with in-person reviews, Limited English Proficiency (LEP) requirements also apply to remote informal reviews, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote informal reviews.</i></p> <p>Conducting Remote Informal Reviews</p> <p><i>The PHA must ensure that the lack of technology or inability to use technology for remote informal reviews does not pose a disadvantage to families that may not be apparent to the PHA. The PHA should determine through a survey or other means if these barriers exist prior to conducting the remote informal review and, if the family does not have the proper technology to fully participate, either postpone the informal review or provide an alternative means of access.</i></p> <p><i>As with in-person informal reviews, the PHA must provide all materials presented, whether paper or electronic, to the family prior to the remote informal review. The family must also be provided with an accessible means by which to transmit their own evidence.</i></p> <p><i>The PHA must ensure that the applicant has the right to hear and be heard. All PHA policies and processes for remote informal reviews must be conducted in accordance with due process requirements and be in compliance with HUD regulations at 24 CFR 982.554 and guidance specified in Notice PIH 2020-32.</i></p> <p><i>Lake MHA Policy</i></p> <p><i>The PHA will conduct remote informal reviews via a video conferencing platform, when available. If, after attempting to resolve any barriers, applicants are unable to adequately access the video conferencing platform at any point, or upon applicant request, the informal review will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in at any point, the remote informal review will be postponed, and an in-person alternative will be provided promptly within a reasonable time.</i></p> <p><i>At least five business days prior to the scheduled remote review, the PHA will provide the family with login information and/or conferencing call-in information and an electronic and/or physical copy of all materials being presented via first class mail and/or email. The notice will advise the family of technological requirements for the hearing and request the family notify the PHA of any known barriers. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person hearing.</i></p>

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			<p><i>If the informal review is to be conducted remotely, the PHA will require the family to provide any documents directly relevant to the informal review at least 24 hours before the scheduled review via mail, email, or in person. The PHA will provide copies of these documents to the PHA representative the same day.</i></p> <p><i>Documents will be shared electronically whenever possible.</i></p> <p><i>The PHA will follow up the email with a phone call and/or email to the applicant at least one business day prior to the remote informal review to ensure that the applicant received all information and is comfortable accessing the video conferencing or call-in platform.</i></p> <p><i>The PHA will ensure that all electronic information stored or transmitted with respect to the informal review is secure, including protecting personally identifiable information (PII), and meets the requirements for accessibility for persons with disabilities and persons with LEP.</i></p> <p>Informal Review Decision</p> <p><i>If the family does not appear within 15 minutes of the scheduled time, and was unable to reschedule the review in advance due to the nature of the conflict, the family must contact the PHA within 24 hours of the scheduled review date, excluding weekends and holidays. The PHA will reschedule the review only if the family can show good cause for the failure to appear, or if it is needed as a reasonable accommodation for a person with disabilities. If the family cannot show good cause for the failure to appear, or a rescheduling is not needed as a reasonable accommodation, the PHA's decision will stand.</i></p>
	16-III.C. Informal Hearings for Participants	makes policy more consistent and aligns with Notice 2020-32	below
	<p>Decisions Subject to Informal Hearing</p> <p>Lake MHA Policy</p> <p>The PHA will only offer participants the opportunity for an informal hearing when required to by the regulations, <i>and if the PHA denies a request for a reasonable accommodation (see Chapter 2).</i></p> <p>Remote Informal Hearings</p> <p><i>There is no requirement that informal hearings be conducted in-person, and as such, HUD allows PHAs to conduct all or a portion of their informal hearings remotely either over the phone, via video conferencing, or through other virtual platforms. If the PHA chooses to conduct remote informal hearings, applicants may still request an in-person informal hearing, as applicable.</i></p> <p>Ensuring Accessibility for Persons with Disabilities and LEP Individuals</p> <p><i>As with in-person informal hearings, the platform for conducting remote informal hearings must be accessible to persons with disabilities and the informal hearings must be conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio description, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support, and transcripts. Auxiliary aids or services must be</i></p>		

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			<p><i>provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual. PHAs may never request or require that individuals with disabilities provide their own auxiliary aids or services, including for remote informal hearings.</i></p> <p><i>PHAs are required to make reasonable accommodations in policies, practices, and procedures to ensure persons with disabilities have a full and equal opportunity to participate in and benefit from all aspects of the informal hearing process. See Chapter 2 for a more detailed discussion of reasonable accommodation requirements.</i></p> <p><i>If no method of conducting a remote informal hearings is available that appropriately accommodates an individual's disability, the PHA may not hold against the individual his or her inability to participate in the remote informal hearing, and the PHA should consider whether postponing the remote hearing to a later date is appropriate or whether there is a suitable alternative.</i></p> <p><i>Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation will depend on the specific circumstances and requirements.</i></p> <p><i>As with in-person reviews, Limited English Proficiency (LEP) requirements also apply to remote informal hearings, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote informal hearings.</i></p> <p>Conducting Informal Hearings Remotely</p> <p><i>The PHA must ensure that the lack of technology or inability to use technology for remote informal hearings does not pose a disadvantage to families that may not be apparent to the PHA. The PHA should determine through a survey or other means if these barriers exist prior to conducting the remote informal hearing and, if the family does not have the proper technology to fully participate, either postpone the informal hearing or provide an alternative means of access.</i></p> <p><i>As with in-person informal hearings, the PHA must provide all materials presented, whether paper or electronic, to the family prior to the remote informal hearing. The family must also be provided with an accessible means by which to transmit their own evidence.</i></p> <p><i>The PHA's essential responsibility is to ensure informal hearings meet the requirements of due process and comply with HUD regulations. Therefore, all PHA policies and processes for remote informal hearings will be conducted in accordance with due process requirements, and will be in compliance with HUD regulations at 24 CFR 982.555 and the guidance for conducting remote hearings specified in Notice PIH 2020-32.</i></p> <p>Lake MHA Policy</p> <p><i>The PHA will conduct remote informal hearings via a video conferencing platform, when available. If, after attempting to resolve any barriers, participants are unable to adequately access the video conferencing platform at any point, or upon request, the informal hearing will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in at any point, the remote informal hearing will be postponed, and an in-person alternative will be provided promptly within a reasonable time.</i></p> <p><i>At least five business days prior to scheduling the remote hearing, the PHA will provide the family with login information and/or conferencing call-in information and an electronic copy of all materials being presented via first class mail and/or email. The notice will advise the family of technological requirements for the hearing and request the family notify the PHA of any known barriers. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person hearing.</i></p> <p><i>The PHA will follow up with a phone call and/or email to the family at least one business day prior to the remote informal hearing to ensure that the family received all information and is comfortable accessing the video conferencing or call-in platform.</i></p>

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			<p><i>The PHA will ensure that all electronic information stored or transmitted with respect to the informal hearing is secure, including protecting personally identifiable information (PII), and meets the requirements for accessibility for persons with disabilities and persons with LEP.</i></p> <p>Scheduling an Informal Hearing</p> <p><i>If the PHA hearing will be conducted remotely, at the time the notice is sent to the family, the family will be notified:</i></p> <p><i>Regarding the processes involved in a remote informal hearing;</i></p> <p><i>That the PHA will provide technical assistance prior to and during the informal hearing, if needed; and</i></p> <p><i>That if the family or any individual witness has any technological, resource, or accessibility barriers, the family may inform the PHA and the PHA will assist the family in either resolving the issue or allow the family to participate in an in-person hearing, as appropriate.</i></p> <p>Pre-Hearing Right to Discovery</p> <p><u>Lake MHA Policy</u></p> <p>The family will be allowed to copy any documents related to the hearing at no cost to the family. The family must request discovery of PHA documents no later than 12:00 p.m. on the business day prior to the scheduled hearing date.</p> <p><u>Lake MHA Policy</u></p> <p>If the informal hearing is to be conducted remotely, the PHA will require the family to provide any documents directly relevant to the informal hearing at least 24 hours before the scheduled hearing <i>via the mail, email, or in person</i>. The PHA will <i>provide</i> copies of these documents to the hearing officer and the PHA representative the same day.</p> <p>Evidence</p> <p><i>Hearsay Evidence is evidence based not on a witness' personal knowledge. In and of itself, hearsay evidence carries no weight when making a finding of fact. The hearing officer may include hearsay evidence when considering their decision if it is corroborated by other evidence. Even though hearsay evidence is generally admissible in a hearing, the hearing officer will not base a hearing decision on hearsay alone unless there is clear probative value and credibility of the evidence, and the party seeking the change has met the burden of proof.</i></p>
	16-IV.B. Repayment Policy	Updates repayment agreements policy based on notice 2018-18.	

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	Exhibits	VAWA forms reformatted, updated, and made uniform for all Lake MHA programs Exhibit 16-5 revised in whole to match NMA version	
17 Special Purpose Vouchers		new as a whole, included only the special purpose vouchers that we administer	See proposed chapter