

Item	Result	Chapter	Chapter/ Section	Current Policy	Proposed Change	Department	Substantial Change Yes or No	Category	Board Discussion	Rationale for Change
1		1	Introduction	The Fair Housing Act, 42 U.S.C. 3610-3619; (c2)	The Fair Housing Act, 42 U.S.C. 3601-3619; (c2)	HMD	No	CFR	No	Correction to transposed numbers in the U.S. code referenced
2		1	Introduction	Section 504 of the Rehabilitation Act of 1973; 28 CFR Part 42;	Section 504 of the Rehabilitation Act of 1973;-29 U.S.C. 79428-CFR Part 42;	HMD	No	CFR	No	Correction to reference; removed CFR and added U.S.C
3		1	Introduction		<del>FH is committed in maintaining compliance with federally-protected classes of race, color, religion, national origin, sex, sex, religion, marital familial status, age, actual or perceived sexual orientation, and disability,-of-national-origins,-as-well-as-additional-protections-afforded-under-the-regulations-with-regard-to-gender-identity,-actual-or-perceived-sexual-orientation,-and-marital-status.</del>	HMD	No	HUD Language	No	Updated language to mirror current Federal Fair Housing protections
6		2	2.2	2.2 DISCRIMINATION COMPLAINTS In all cases, FH may advise the family to file a fair housing complaint if the family feels they have been discriminated against under the Fair Housing Act. Upon receipt of housing discrimination complaint, FH is required to: <input type="checkbox"/> Provide written notice of the complaint to those alleged and inform the complainant that such notice was made. <input type="checkbox"/> Investigate the allegations and provide the complaint and those alleged with findings and either a proposed corrective action or an explanation of why corrective actions is not warranted. <input type="checkbox"/> Keep records of all complaint, investigations, notices, and corrective actions [Notice PIH 2014-20] If an applicant or resident family believes that any family member has been discriminated against by FH, the family should advise FH. FH should make every reasonable attempt to determine whether the applicant's or resident family's assertions have merit and take any warranted corrective action. Page   21 <input type="checkbox"/> Applicants or resident families who believe that they have been subject to unlawful discrimination may notify FH either orally or in writing. <input type="checkbox"/> FH will attempt to remedy discrimination complaints made against FH. FH will provide a copy of a discrimination complaint form to the complainant and provide them with information on how to complete and submit the form to HUD's Office of Fair Housing and Equal Opportunity (FHEO). FH will keep record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.) PART II: POLICIES RELATED TO PERSONS WITH DISABILIT	2.3 Applicants or tenant families who believe that they have been subject to unlawful discrimination based on marital status, gender identity, or sexual orientation under the Equal Access Rule may notify the FH either orally or in writing.  Within 10 business days of receiving the complaint, the FH will provide a written notice to those alleged to have violated the rule. The FH will also send a written notice to the complainant informing them that notice was sent to those alleged to have violated the rule, as well as information on how to complete and submit a housing discrimination complaint form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).  The FH will attempt to remedy discrimination complaints made against the FH and will conduct an investigation into all allegations of discrimination. Within 10 business days following the conclusion of the FH's investigation, the PHA will provide the complainant and those alleged to have violated the rule with findings and either a proposed corrective action plan or an explanation of why corrective action is not warranted.  The FH will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)	HMD	No	HUD Language	No	In January 2023, HUD published the Respondent Obligations in Fair Housing Investigations Interactive Diagram. The updated language is based on this diagram
7		2	2.4	No previous language	VAWA Complaint Processing [Notice FHEO 2023-01] Applicants or tenant families who wish to file a VAWA complaint against the PHA may notify the PHA either orally or in writing. The PHA will advise the family of their right to file a VAWA complaint with HUD's Office of Fair Housing and Equal Opportunity (FHEO). The PHA will inform the family that not later than one year after an alleged VAWA violation has occurred or terminated, applicants and tenants who believe they have been injured by a VAWA violation or will be injured by such a violation that is about to occur may file a VAWA complaint using FHEO's online complaint form via mail, email, or telephone. The PHA will attempt to remedy complaints made against the PHA and will conduct an investigation into all allegations of discrimination. The PHA will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)	HMD	No	HUD Language	No	Notice FHEO 2023-01 Requires PHA's to spell out procedures on how they will handle complaints from applicants or residents related to their status as a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking
8		2	2.4	One type of disability discrimination prohibited by the Fair Housing Act is the refusal to make reasonable accommodation in rules, policies, practices, or services when such accommodation may be necessary to afford a person with a disability the equal opportunity to use and enjoy a program or dwelling under program.	The Fair Housing Act prohibits discrimination based on disability. This includes refusal to make reasonable accommodation in rules, policies, practices, or services when such accommodation may be necessary to afford a person with a disability the equal opportunity to use and enjoy a program or dwelling under program.	HMD	No	HUD Language	No	Aligned current ACOP language to HUD suggested language
9		3	3.3	When a family on the interest list breaks up into two otherwise eligible families, only one of the new families may retain the original application date. Other former family members may make a new application with a new application date if the interest list is open.	If the family breakup results from an occurrence of domestic violence, dating violence, sexual assault, or human trafficking, the PHA must ensure that the victim retains assistance. (For documentation requirements and policies related to domestic violence, dating violence, sexual assault, and stalking, and human trafficking, see section 16-VII.D of this plan.)	HMD	Yes	HUD Language	Yes	The PHA has discretion to determine which members of an assisted family continue to receive assistance if the family breaks up. We added Human Trafficking to the VAWA language that gives VAWA victims preference over other family members in a family-breakup situation
10		3	3.35	3.3 PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING [24 CFR PART5, SUBPART L]	3.3 PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, STALKING, OR HUMAN TRAFFICKING [24 CFR PART5, SUBPART L]	HMD	No	HUD Language	No	Updated VAWA language to include Human Trafficking
13		6	6.22	A minimum rent \$50 [24 CFR 5.630]	Staff recommendation to lower our minimum rent from \$50 to \$25 for PBV/Renaissance.  § 5.630 Minimum rent. (a) Minimum rent. (1) The PHA must charge a family no less than a minimum monthly rent established by the responsible entity, except as described in paragraph (b) of this section. (2) For the public housing program and the section 8 moderate rehabilitation, and certificate or voucher programs, the PHA may establish a minimum rent of up to \$50. (3) For other section 8 programs, the minimum rent is \$25.  Page 1	HMD	Yes	CFR	Yes	Staff Recommendation to lower minimum rent for PBV/PSH units from \$50 to \$25. This is included here for discussion on whether or not LIPH should be mirror that change. However, staff is not recommending a change to our Public Housing minimum rents at this time.

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14		6	6.23	Replaced existing chart	Updated TTP calculation chart to include full calculation method	HMD	No	Correction	No	Correction - updated TTP calculation chart to mirror current HUD method
15		6	6.5	<b>Lifetime Limitation</b> The EID has a four-year (48-month) lifetime maximum. The four-year eligibility period begins at the same time that the initial exclusion period begins and ends 48 months later. The one-time eligibility for the EID applies even if the eligible individual begins to receive assistance from another housing agency, if the individual moves between public housing and Section 8 assistance, or if there are breaks in assistance. During the 48-month eligibility period, FH will conduct an interim reexamination each time there is a change in the family member's annual income that affects or is affected by the EID (e.g., when the family member's income falls to a level at or below his/her prequalifying income, when one of the exclusion periods ends, and at the end of the lifetime maximum eligibility period). FH will retain the EID documentation in the resident file for the "duration of tenancy" and up to three (3) years after program participation ends.	Removed	HMD	NO	HUD Language	No	Removed outdated language related to previous EID changes and grandfathered clause for families qualifying prior to May 9, 2016
16		7	7.11	<b>Verification of Disability</b>	For family members claiming disability who receive disability payments from the SSA, the FH will attempt to obtain information about disability benefits through HUD's Enterprise Income Verification (EIV) system. If documentation is not available through HUD's EIV system, FH will request a current (dated within the last 60 days) SSA benefit verification letter from each family member claiming disability status. If a family member is unable to provide the document, FH will ask the family to obtain a benefit verification letter either by calling SSA at 1-800-772-1213, or by requesting one from www.ssa.gov. Once the family receives the benefit verification letter, they will be required to provide the letter to the PHA.	HMD	No	HUD Language	No	Procedure - added HUD language that allows staff to accept SSA award letters in lieu of third party verification after failed attempts
17		7	7.11	<b>Verification of Disability</b>	For family members claiming disability who do not receive SSI or other disability payments from the SSA, a knowledgeable professional must provide third-party verification that the family member meets the HUD definition of disability. See the Eligibility chapter for the HUD definition of disability. The knowledgeable professional will verify whether the family member does or does not meet the HUD definition.	HMD	NO	HUD Language	No	Procedure - added HUD language that allows staff to accept SSI award letters in lieu of third party verification after failed attempts
20		9	Into	FH is required to verify each family's income and composition annually in order to adjust the family's rent accordingly	Except for non-public housing over income families, FH is required to verify each family's income and composition annually in order to adjust the family's rent accordingly	HMD	Yes	HOTMA	No	Added language consistent with HOTMA's over-income rule; families paying non-public housing rent are no longer required to complete an annual reexamination
21		9	9.9	If the head of household or any adult member of the household is unable to attend the interview the appointment will be rescheduled as outlined in <i>Reexamination Notice Timeline</i> of this Chapter	If the head of household or any adult member of the household is unable to attend the interview the appointment will be rescheduled as outlined in <i>Reexamination Notice Timeline</i> of this Chapter, but in all cases the appointment must occur no less than 30 days before the effective date. Failure to comply with the reexamination requirement will be material breach of the lease and may result in termination of tenancy.	HMD	Yes	Policy	Yes	Staff Recommendation - families who refuse to complete annual reexaminations may be terminated from the program for non-compliance
30		13	Into	<b>Part II: Termination by FH - Mandatory.</b> This part describes the policies that govern how, and under what circumstances, a mandatory lease termination by the FH occurs. This part also includes nonrenewal of the lease for noncompliance with community service requirements	Part II: Termination by FH - Mandatory. This part describes the policies that govern how, and under what circumstances, a mandatory lease termination by the FH occurs. This part also includes nonrenewal of the lease for noncompliance with community service requirements and families that have been over the income limit for 24 consecutive months.	HMD	Yes	HOTMA	Yes	Addition of HOTMA requirement that FH families over the income limit for 24 consecutive months must be terminated from the program.
31		13	13.7	If, at any time, an over-income family experiences a decrease in income, the family may request an interim redetermination of rent in accordance with FH policy	If, at any time during the 24-month period following the initial over-income determination, an over-income family experiences a decrease in income, the family may request an interim redetermination of rent in accordance with FH policy in Chapter 9	HMD	No	HOTMA	No	HOTMA language allows over income families to request a rent determination only during the initial 24 month period
32		13	13.7	N/A	For families whose income exceeds the over-income limit for 24 consecutive months, the PHA will terminate the tenancy of the family no more than six months after the final notification of the family's over-income status. During the period before termination, the over-income family will continue to be a public housing program participant until their tenancy is terminated. The PHA will continue to charge the family rent in accordance with public housing regulations, will offer the family the choice between income-based and flat rent as required by the regulations, and will prorate rent for mixed families. The PHA will give appropriate notice of lease tenancy termination (notice to vacate) in accordance with state and local laws.	HMD	Yes	HOTMA	Yes	Decision Point - HOTMA requires that over income families be terminated from the program; within 6 months after the initial 24 month period, occupancy must also be terminated or the unit taken offline from the program. The PHA would not receive subsidy, a new lease would have to be signed and the family would not be eligible for reexaminations

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33		ALL	ALL	(Although the VAWA 2022 statute does not specifically include human trafficking in the list of victims protected under VAWA, in 2022 HUD began including human trafficking as part of the list of victims protected under VAWA (as seen in Notices PIH 2022-06, PIH 2022-22, and PIH 2022-24). In the absence of a final rule implementing VAWA 2022 and to mirror HUD's recent usage, this policy includes human trafficking in addition to domestic violence, dating violence, sexual assault, and stalking anywhere such a list appears.)	Adding "Human Trafficking" to the list of protections under VAWA throughout the document	HMD	No	HUD Language	No	Added Human Trafficking to VAWA protection language - Although the VAWA 2022 statute does not specifically include human trafficking in the list of victims protected under VAWA, in 2022 HUD began including human trafficking as part of the list of victims protected under VAWA (as seen in Notices PIH 2022-06, PIH 2022-22, and PIH 2022-24). In the absence of a final rule implementing VAWA 2022 and to mirror HUD's recent usage, this policy includes human trafficking in addition to domestic violence, dating violence, sexual assault, and stalking anywhere such a list appears.