

| <b>Chapter/<br/>Section</b>  | <b>Current ACOP Language</b>  | <b>Proposed Language</b>  |
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| 8.4 Tenant Selection Criteria / Additional Applicant Information; Criminal Background Check, Sex Offenders | <p>Denial for Other Sex Offenders: Except where banned for life or subject to present sex registry registration exclusion, admission will be denied to any household member currently charged with or convicted in the last ten (10) years of the projected date of admission of any offense listed as a sexual offense in Pennsylvania Consolidated Statutes Annotated, or a conviction in another state of a similar offense. This includes any attempt, conspiracy or solicitation to commit these crimes and also includes the crime of indecent assault or the attempt, conspiracy or solicitation to commit indecent assault.</p> <p>HACP is required to deny the application of a household if HACP determines that any member of the household is subject to current registration requirements under any state sex offender registration program for the duration of the registration period.</p> | <p>Denial for Other Sex Offenders: Except where banned for life, admission will be denied to any household member currently charged with or convicted in the last ten (10) years of the projected date of admission of any offense listed as a sexual offense in Pennsylvania Consolidated Statutes Annotated, or a conviction in another state of a similar offense. This includes any attempt, conspiracy or solicitation to commit these crimes and also includes the crime of indecent assault or the attempt, conspiracy or solicitation to commit indecent assault.</p>   |
| 8.4 Tenant Selection Criteria/Additional Applicant Information   | <p>For the purpose of this Policy, if any member of the applicant family is currently charged with any of the following listed offenses, including offenses listed in subsequent sections on 10 Year Denial, Denial for Sex Offenders and Denied for Life sections, they will be determined to have engaged in criminal activity, drug-related criminal activity or violent criminal activity and will be denied admission while the charges are pending....</p> <p>Other Offenses</p> <ol style="list-style-type: none"> <li>1. Disarming a Law Enforcement Officer</li> <li>2. Prostitution/ promoting prostitution</li> <li>3. Corruption of minors</li> <li>4. Any violation of the Uniform Firearms Act.</li> <li>5. Endangering the welfare of children</li> <li>6. Open lewdness</li> <li>7. Resisting arrest</li> <li>8. Ethnic intimidation or any crime designated a hate crime</li> </ol>      | <p>For the purpose of this Policy, if any member of the applicant family is currently charged with any of the following listed offenses, including offenses listed in subsequent sections on 10 Year Denial, Denial for Sex Offenders and Denied for Life sections, they will be determined to have engaged in criminal activity, drug-related criminal activity or violent criminal activity and may be denied admission while the charges are pending....</p> <p>Other Offenses</p> <ol style="list-style-type: none"> <li>1. Disarming a Law Enforcement Officer</li> <li>2. Prostitution/ promoting prostitution</li> <li>3. Corruption of minors</li> <li>4. Any violation of the Uniform Firearms Act.</li> <li>5. Endangering the welfare of children</li> <li>6. Open lewdness</li> <li>7. Resisting arrest</li> <li>8. Ethnic intimidation or any crime designated a hate crime</li> <li>9. Statutory Rape/Statutory Sexual Assault</li> </ol> |
| 8.6 Denied for Life  | <p><b>1. Manufacturing Methamphetamines</b></p> <p>If any family member has been convicted of manufacturing or producing methamphetamine (speed) in a public housing development or in a Section 8 assisted property, they will be denied admission to HACP for life.</p> <p><b>2. Lifetime Sex Offender</b></p> <p>Prohibition on persons subject to Lifetime Sex Offender Registration requirement:</p>   | <p><b>1. Manufacturing Methamphetamines</b></p> <p>If any family member has been convicted of manufacturing or producing methamphetamine (speed) in a public housing development or in a Section 8 assisted property, they will be denied admission to HACP for life.</p> <p><b>2. Lifetime Sex Offender</b></p> <p>Prohibition on persons subject to Lifetime Sex Offender Registration requirement:</p>   |

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|                                    | <p>If any family member is subject to a lifetime registration under a state sex offender registration program, he/she will be denied for life by HACP.</p> <p>Should HACP discover that a member of an assisted household was subject to a lifetime registration requirement at admission and was erroneously admitted after June 25, 2001, the HACP will immediately terminate assistance for the household member.</p> <p>In this situation, the HACP will offer the family the opportunity to remove the ineligible family member from the household. If the family is unwilling to remove that individual from the household, the HACP will terminate assistance for the household.</p>   | <p>If any family member is subject to a lifetime registration under a state sex offender registration program, he/she will be denied for life by HACP.</p> <p>Should HACP discover that a member of an assisted household was subject to a lifetime registration requirement at admission and was erroneously admitted after June 25, 2001, the HACP will immediately terminate assistance for the household member.</p> <p>In this situation, the HACP will offer the family the opportunity to remove the ineligible family member from the household. If the family is unwilling to remove that individual from the household, the HACP will terminate assistance for the household.</p> <p style="text-align: center;"><b>3. Specific Crimes</b></p> <p>Applicants and/or their household members who have been convicted of the following crimes will be denied for life from participation by HACP.</p> <ul style="list-style-type: none"> <li>▪ Murder</li> <li>▪ Rape (excluding statutory rape/statutory sexual assault)</li> <li>▪ Kidnapping</li> <li>▪ Involuntary Deviate Sexual Intercourse</li> <li>▪ Arson</li> </ul> <p><b><u>Opportunity to Dispute</u></b></p> <p>An applicant who has been denied LIPH on the basis that he/she is subject to a lifetime registration requirement under a state sex offender registration program and/or has committed rape, kidnapping, involuntary deviant sexual intercourse, or arson, shall have the opportunity for an informal grievance hearing, only to dispute whether the applicant is in fact, the person convicted of the crime. HACP will not re-litigate the matter or consider evidence of rehabilitation. Evidence of rehabilitaton and other mitigating factors may be considered when the conviction is for murder.</p> |
| <p>8.7 Other Criminal Activity</p> | <p>“Other criminal activity” means a history of criminal activity involving crimes of actual or threatened violence to person/s or property, or a history of other criminal acts, conduct or behavior which would adversely affect the health, safety, or welfare of other residents.</p> <p>HUD defines “violent criminal activity” as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force against a person or property, and any family member engaged in the activity.</p> <p>Applicants and/or their household members who have been convicted of the following crimes will be denied for life from participation by HACP.</p> <p>Murder<br/>Rape<br/>Kidnapping</p> | <p>“Other criminal activity” means a history of criminal activity involving crimes of actual or threatened violence to person/s or property, or a history of other criminal acts, conduct or behavior which would adversely affect the health, safety, or welfare of other residents.</p> <p>HUD defines “violent criminal activity” as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force against a person or property, and any family member engaged in the activity.</p> <p><b><u>Evidence</u></b></p> <p>HACP will consider credible evidence as proof that a crime has been committed. Credible evidence includes, but is not limited to police and/or court records, testimony from neighbors and/or documentation of drug raids or arrest warrants, evidence gathered by PHA inspectors and/or an investigator, or a combination of any form of evidence. This section is not intended to be an exhaustive list of the types of evidence the HACP will consider.</p>   |

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|  | <p>Involuntary Deviate Secual Intercourse<br/>Arson</p> <p><b><u>Evidence</u></b></p> <p>HACP will consider credible evidence as proof that a crime has been committed. Credible evidence includes, but is not limited to police and/or court records, testimony from neighbors and/or documentation of drug raids or arrest warrants, evidence gathered by PHA inspectors and/or an investigator, or a combination of any form of evidence. This section is not intended to be an exhaustive list of the types of evidence the HACP will consider.</p> <p><b><u>Opportunity to Dispute</u></b></p> <p>An applicant who has been denied LIPH on the basis that he/She is subject to a lifetime registraion requirement under a state sex offender registration program and/or has committed a violent crime as set forth in Section 8.4 and 8.6 shall have the opportunity for an informed grievance hearing, only to dispute whether the appliant is in fact, the person convicted of the crime. HACP will not r-litigate the matter or consider evidence of rehabilitation.</p> |   |
| <p>8.8 Addition and Removal of Family Members from the Household</p> | <p>A head-of-household may seek to add another person to the household as an additional family member. <u>The HACP will not add another person/s to the household if the addition/s to household will create an occupancy violation or result in the need for a larger unit (resident wishes to transfer to a larger unit).</u> This rule does not apply when the addition to the household is due to a birth or adoption of a minor child or family reunification involving the Allegheny County Department of Children, Youth, and Families (CYF).</p>  | <p>A head-of-household may seek to add another person to the household as an additional family member. <u>The HACP will not add another person/s to the household if the addition/s to household will create an occupancy violation or result in the need for a larger unit (resident wishes to transfer to a larger unit).</u> This rule does not apply when the addition to the household is due to marriage, a birth or adoption of a minor child or family reunification involving the Allegheny County Department of Children, Youth, and Families (CYF).</p>                              |
| <p>8.8 Addition and Removal of Family Members from Household</p>     | <p>When adding a child to the household an adult member of the household must have written proof of custody of the child they are seeking to add to the household. The HACP must have all required documents for minor children prior to the child being added to the household.</p>  | <p>When adding a child to the household, parents/guardians must show proof they have a physical custody order or some other supporting documentation of custody/residency of a child for whom they are requesting a bedroom or the parent/guardian must show proof that the child/ren are expected to be physically in the home overnight for more than 185 days within a twelve (12) month period. All documentation is subject to LIPH and/or Legal department approval. The HACP must have all required documents for minor children prior to the child being added to the household.</p>    |
| <p>10.1 Managing the Waiting Lists</p>                               | <p>When the estimated wait time for a new applicant on a specific waiting list becomes six (3) months or less, the HACP will reopen that specific LIPH Waiting List after public notice.</p>  | <p>When the estimated wait time for a new applicant on a specific waiting list becomes six (6) months or less, the HACP will reopen that specific LIPH Waiting List after public notice.</p>  |
| <p>10.2 Waiting List Options</p>                                     | <p>To assist applicants in the selection of an option that best meets their needs, the HACP will update the web site to include the following information for each development:<br/> A description of the development<br/> The targeted population served (family community, elderly/disabled)<br/> Age restrictions, if applicable<br/> The total number of units and bedroom distribution<br/> The number of UFAS accessible units by bedroom distribution and timeline for availability<br/> The number of units with accessible features<br/> A description of the accessible features available (hearing impaired, visually impaired, roll-in</p>  | <p>To assist applicants in the selection of an option that best meets their needs, the HACP will update the web site to include the following information for each development:<br/> § A description of the development<br/> § The targeted population served (family community, elderly/disabled)<br/> § Age restrictions, if applicable<br/> § The total number of units and bedroom distribution<br/> § The number of UFAS accessible units by bedroom<br/> The number of units with accessible features<br/> § A list of the various social service programs located in the development</p> |

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|                                      | <p>showers, etc.)<br/> Information on elevator, if applicable<br/> The size of the unit for standard and UFAS (square feet)<br/> The annual turnover rate for standard units<br/> The annual turnover rate for UFAS accessible units<br/> The projected wait time for vacancies for standard units by bedroom distribution<br/> The projected wait time for vacancies for UFAS accessible units by bedroom distribution<br/> A list of the various social service programs located in the development<br/> Location of the social service programs and accessibility information.<br/> Information on the various amenities available in the development<br/> Laundry, community room, playground, etc.<br/> Accessibility of laundry (front loading washers)<br/> Information on proximity to hospitals and schools Information on parking (lots or on the street)<br/> Information on accessible parking<br/> The topography of the surrounding community<br/> Information on public transportation<br/> A small site map indicating the location of the management office and community center<br/> Driving Directions<br/> Information regarding on-site security</p> | <p>§ Location of the social service programs and accessibility information<br/> § Information on the various amenities available in the development<br/> § Laundry, community room, playground, etc.<br/> § Accessibility of laundry (front loading washers)<br/> § Information on proximity to hospitals and schools<br/> § Information on parking (lots or on the street)<br/> § Information on accessible parking<br/> § The topography of the surrounding community<br/> § Information on public transportation<br/> § A small site map indicating the location of the management office and community center<br/> § Driving Directions<br/> § Information regarding on-site security</p>   |
| <p>15.0 Transfer and Relocation</p>  | <p>*The HACP reserves the right to initiate a “Management Initiated” transfer at any time to: a) alleviate resident conflict and maintain harmony in its buildings and/or communities; b) facilitate completion of major unit repairs; c) to provide transfers for graduates of the HACP career development program who have secured and maintained employment; or d) alleviate any other issue/s that Management feels is pertinent to assist with resident relations. Based on the seriousness of the issue and reason, the Management Initiated transfer can be considered the same as an Emergency transfer and carry equal weight, or can be given lower weight.</p>   | <p>This paragraph was stated twice in this section. Removed one instance of the paragraph.</p>  |
| <p>15.0 Transfers and Relocation</p> | <p>If a resident’s transfer is approved for emergency, grossly under-housed or grossly over-housed situations, the resident’s name is placed on the Site Based Waiting Lists for all communities that offer their required bedroom size. Residents required to transfer due to emergency, grossly under-housed or grossly over-housed situations, must accept the unit assigned to them by the HACP. Residents are only assigned apartments that meet the eligibility needs of the family. Families who refuse to transfer into a unit that meets the approved needs of the family, or who fail to transfer within thirty (30) days after an apartment offer is accepted, are considered to be in violation of the HACP lease, and are subject to eviction proceedings.</p> <p>Residents who fail to accept a transfer without just cause, will have to wait one (1) year from the date of refusal before he/she applies for another transfer, if the reason for the request is the same.</p>   | <p>If a resident’s transfer is approved for grossly under-housed or grossly over-housed situations, the resident’s name is placed on the Site Based Waiting Lists for all communities that offer their required bedroom size. Residents required to transfer due to grossly under-housed or grossly over-housed situations, must accept the unit assigned to them by the HACP. Residents are only assigned apartments that meet the eligibility needs of the family. Families who refuse to transfer into a unit that meets the approved needs of the family, or who fail to transfer within thirty (30) days after an apartment offer is accepted, are considered to be in violation of the HACP lease, and are subject to eviction proceedings.</p> <p>Residents who fail to accept a transfer without just cause in any of the following categories: underhoused, work and school related and resident requested, will have to wait one (1) year from the date of refusal before he/she applies for another transfer, if the reason for the request is the same.</p> |
| <p>15.0 Transfers and Relocation</p> | <p>When HACP does not have any residents or applicants on the waiting list who need the features of an accessible apartment, HACP may offer the accessible apartment to an applicant or resident who does not need the accessible features of the apartment upon the signing of a Lease Addendum. By signing the Lease Addendum the resident or applicant assigned to an</p>  | <p>When HACP does not have any residents or applicants on the waiting list who need the features of an accessible apartment, HACP may offer the accessible apartment to an applicant or resident who does not need the accessible features of the apartment upon the signing of a Lease Addendum. By signing the Lease Addendum the resident or applicant assigned to an accessible apartment who does not need the features of the apartment</p>   |

accessible apartment who does not need the features of the apartment agrees to move, at HACP's expense, if a person with an approved disability needs the apartment.

- a) A resident who is approved for a transfer will be offered an apartment that reasonably meets the approved reasonable accommodation request of the resident in the resident's current community.
- b) If there is no apartment in the resident's current community that meets the approved reasonable accommodation needs of the resident, the resident may select as many communities of preference as the resident desires, as long as the selected communities have the bedroom size for which the resident is eligible.
- c) If the resident declines the apartment offered in the resident's current community or communities of preference that meets the approved disability-related need without just cause, the resident's name will be removed from the Transfer List on the date that he or she declines. Unless the purpose of the transfer is to be in a specific community as a result of reasonable accommodation, job, safety or school-related issues, the resident requesting the transfer will be offered a unit that meets their approved needs in the resident's current community, if available. If no units are available that meet the resident's approved disability-related need in the current community, the resident will be transferred to the resident's community of preference or first-available unit that meets the resident's need as indicated on the resident's Site Selection Chart. Transfer requests that are not related to a reasonable accommodation and require the resident to be moved outside of their current community of residence will be placed on a specific site Waiting List/s in date and time order, according to when the completed transfer request is received by the Site-Based Management Office. Transfer Requests will be weighted based on priority established in the rank-order list in this section of the document.

Residents who are required to transfer due to an emergency, grossly over or under-housed must accept the unit assigned to them by the HACP. Residents will only be assigned apartments that meet the eligibility needs of the family. Families who refuse to transfer into a unit that meets the approved needs of the family, or who fail to transfer within fifteen (15) days after an apartment is offered, are considered to be in violation the HACP lease, and are subject to eviction proceedings.

Residents who fail to accept a transfer, without just cause, will have to wait one year from the date of refusal before he/she applies for another transfer, if the reason for the request is the same.

The HACP will pay moving expenses and utility connection/disconnection fees related to the move for transfers that result from an approved reasonable accommodation request for residents with disabilities.

The Housing Authority of the City of Pittsburgh reserves the right to defer transfers, except in cases of emergency and reasonable accommodations, until five (5) new move-ins have been made. The HACP reserves the right to have a move-in transfer ratio of five (5) to one (1). All

agrees to move, at HACP's expense, if a person with an approved disability needs the apartment.

A resident who is approved for a transfer based on a reasonable accommodation will be offered an apartment that reasonably meets the approved reasonable accommodation request of the resident in the resident's current community. Unless the purpose of the transfer is to be in a specific community as a result of reasonable accommodation, job, safety or school-related issues, the resident requesting the transfer will be offered a unit that meets their approved needs in the resident's current community, if available.

If there is no apartment in the resident's current community that meets the approved reasonable accommodation needs of the resident, the resident may select as many communities of preference as the resident desires, as long as the selected communities have the bedroom size for which the resident is eligible. The resident will be transferred to the resident's community of preference or first- available unit that meets the resident's need as indicated on the resident's Site Selection Chart.

If the resident declines the apartment offered in the resident's current community or communities of preference that meets the approved disability-related need without just cause, the resident's name will be removed from the Transfer List on the date that he or she declines. The reasonable accommodation will be closed upon confirmation that the transfer was declined without just cause.

Residents who are required to transfer due to an emergency as determined by HACP,, must accept the unit assigned to them by the HACP. Residents will only be assigned apartments that meet the eligibility needs of the family. Families who refuse to transfer into a unit that meets the approved needs of the family, or who fail to transfer within fifteen (15) days after an apartment is offered without just cause are considered to be in violation the HACP lease, and are subject to eviction proceedings.

The HACP will pay moving expenses and utility connection/disconnection fees related to the move for transfers that result from an approved reasonable accommodation request for residents with disabilities.

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|  | transfers regardless of the move-in/transfer ratio will be made according to the above listed priority.   |   |
| 16.1 Income                              | As per NOTICE PIH-2013-03, the HACP will utilize the temporary provisions established by this notice until March 31, 2014. The temporary provision is as follows:<br>This Notice allows a PHA to accept a family's declaration of the amount of assets of less than \$5,000, and the amount of income expected to be received from those assets. The PHA's application and reexamination documentation, which is signed by all adult family members, can serve as the declaration. Where the family has net family assets equal to or less than \$5000, the PHAs does not need to request supporting documentation (e.g. bank statements) from the family to confirm the assets or the amount of income expected to be received from those assets. Where the family has net family assets in excess of \$5000, the PHA must obtain supporting documentation (e.g. bank statements) from the family to confirm the assets. Any assets will continue to be reported on HUD Form 50058. (24 CFR 5.609(b)(3), 982.516(a)(2)(ii), 960.259(c)). | Where the family has net family assets equal to or less than \$5000, A PHA must obtain third-party verification of all family assets regardless of the total asset value (PIH Notice 2016-05)(24 CFR 960.259): (1) upon admitting a family to the LIPH Program, (2) whenever a family member is added to the household, and (3) then again at least every 3 years thereafter. During the intervening annual and interim reexaminations, HACP may accept a family declaration of assets under \$5,000 as stated in Notice PIH 2016-05 (24 CFR 982.516).<br><br>Where the family has net family assets in excess of \$5000, the PHA must obtain supporting documentation (e.g. bank statements) from the family to confirm he assets. HACP will follow HUD's Verification Hierarchy (PIH Notice 2017-12), which includes third party verification of all assets when the family has net assets in excess of \$5,000.<br>Any assets will continue to be reported on HUD Form 50058. (24 CFR 5.609(b)(3), 982.516(a)(2)(ii), 960.259(c)).   |
| 17.3 Types of Verification               | Seasonal Employees (example. school board, construction employees, etc.) who show a consistent employment pattern of 9 months or more (with proper 12 month history of employment) during their work season, will have their rent calculated and spread out over the course of the year (12 months). Any variations from the employment history will result in a recalculation of the income and rent.  | Seasonal Employees (example. school board, construction employees, etc.) who show a consistent employment pattern of 9 months or more (with proper 12 month history of employment) during their work season, will have their rent calculated and spread out over the course of the year (12 months). Any variations from the employment history will result in a recalculation of the income and rent. Residents with a history of employment whose regular reexamination takes place at a time when they are not employed must have their income calculated based on their past and anticipated employment.  |
| 17.6 Frequency of Obtaining Verification | For each family member age six (6) and above, verification of Social Security number will be obtained only once. This verification should be accomplished prior to admission. When a family member who did not have a Social Security number at admission receives a Social Security number, that number will be verified at the next regular re-certification. Likewise, when a child turns six (6), their verification will be obtained at the next regular re-certification.   | For each family member age six (6) and above, verification of Social Security number will be obtained only once. This verification must be accomplished prior to admission for all adults and children six (6) and older. Int the event an applicant family is unable to provide the documentation necessary to verify the Social Security Number (SSN) of a family member under the age of 6 years of age, the HACP will grant the family a 90-day period (from the date the family notifies HACP of such inability) in which to provide the necessary documentation for the family member. During this time period, the family may become a program participant. An additional extension of one additional 90-day period must be granted if the PHA determines that , in its discretion, the applicant's failure to comply was due to circumstances that could not reasonably have been foreseen and were outside of the control of the applicant. If the applicant family does not produce the required documentation within the authorized time period, the PHA or processing entity must impose appropriate penalties, in accordance with 24 CFR 5.218.. When a family member who did not have a Social Security number at admission receives a Social Security number, that number will be verified at the next regular re-certification. Likewise, when a child turns six (6), their verification will be obtained at the next regular re-certification. |
| 19.2 Interim Recertification             | The family shall report these changes within ten (10) days of their occurrence.   | The family shall report these changes in writing within ten (10) days of their occurrence. If the family provides verbal notice, HACP will also require the family to submit the changes in writing or alternative forms for reasonable accommodation. Based on the type of change reported, HACP will determine the documentation the family will be required to submit. The family must submit any required information or documents within 10 days of receiving a request from HACP. This time frame may be extended for good cause with HACP approval.  |

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|   |  | HACP will accept required documentation by mail, by fax, by email or in person.  |
| 22.0<br>Identification/<br>No Trespass/<br>Exclusion List<br>Policy (E) | "Any person to whom a No Trespass/Exclusion Notice is issued may seek an informal review to contest issuance of the Notice by mailing a written request via certified mail within seven (7) days from the date of issuance of the Notice to the HACP Legal Department, 200 Ross Street – 7th Floor, Pittsburgh, PA 15219." | "Any person to whom a No Trespass/Exclusion Notice is issued may seek an informal review to contest receipt of the Notice by mailing a written request via certified mail within seven (7) days from the date of of the Notice to the HACP Legal Department, 200 Ross Street – 7th Floor, Pittsburgh, PA 15219." |
| <b>Tenant Charges</b>   | After hours lock out fee    \$85.00  | After hours lock out fee (weekdays and Saturday)    \$204.00<br>After hours lock out fee (Sunday)    \$274.00  |