

Chapter, Section and Page	Current ACOP Language	Proposed Language
Section 8.9 - Additions and removal of family members from the household Page 23	<ul style="list-style-type: none"> <li>▪ Removal from household</li> </ul> <p>Adult members of the household must remove themselves from the household. The head of household may not on their own remove another adult person from the household.</p> <p>When an adult member of the household has moved, the head-of-household must provide proof that the adult person has in fact moved from the LIPH unit. Proof that the person has moved may be in the form of a new lease, a utility bill, a notarized affidavit, under oath, from the remaining adult household member or some other written documentation showing that the person no longer resides in the LIPH household.</p>	<p>(in addition to existing language)</p> <ul style="list-style-type: none"> <li>• <b>Removal of a minor from the household.</b></li> </ul> <p><b>When removing a minor from the household, the Head of Household must provide a court ordered custody agreement. If an court ordered custody agreement is not available, the HOH may submit a notarized statement from both the new guardian and the head of household detailing the custody arrangement. In the event of a dispute, or where custody is listed as equal, HACP will review court documents, where the child's money (child support, SS, etc.) is being sent, and where the child is registered for school to make a determination as to where the housing subsidy is apportioned.</b></p>
Section 12.1- Housing Unit Occupancy Standards Page 43	<ul style="list-style-type: none"> <li>▪ Persons with an age differential of more than 5 years and persons of the opposite sex when one of the children is three years of age or older will be provided separate bedrooms.</li> <li>▪ Children of the same sex normally should share a bedroom if the difference in their age is 5 years or less. If their age difference is more than 5 years, then they may receive separate bedrooms depending upon availability. Residents are obligated to request such transfers.</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Taking into account current unit availability, unit assignment should provide for the smallest number of bedrooms needed to house a family without overcrowding. Unit size will be assigned so that a minimum of one person will occupy each bedroom and no more than two will be required to share a bedroom.</b></li> <li>• <b>Children of the same sex share a bedroom under age 18. Children of opposite sex share a bedroom until one of the children reaches age three (3).</b></li> </ul>
15.1 - Transfers and Relocation Page 46-47	<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</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</p>

	<p>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>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>considered the same as an Emergency transfer and carry equal weight, or can be given lower weight.</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. <b>Grossly under-housed or grossly over-housed situations can be considered the same as an Emergency transfer and carry equal weight, or can be given lower weight.</b> 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>16.3 -Deductions from Annual Income Page 55, 4 (a-c)</p>	<p>4. For any elderly or disabled family: a) That has no disability assistance expenses, an allowance for medical expenses equal to the amount by which the medical expenses exceed 3% of annual income; b) That has disability expenses greater than or equal to 3% of annual income, an allowance for disability assistance expenses computed in accordance with paragraph C, plus an allowance for medical expenses that equal the family's medical expenses; c) That has disability assistance expenses that are less than 3% of annual income, an allowance for combined disability assistance expenses and medical expenses that is equal to the total of these</p>	<p>4. For any elderly or disabled family: a) That has no disability assistance expenses, an allowance for medical expenses equal to the amount by which the medical expenses exceed 3% of annual income; b) That has disability expenses greater than or equal to 3% of annual income, an allowance for disability assistance expenses computed in accordance with paragraph C, plus an allowance for medical expenses that equal the family's medical expenses; c) That has disability assistance expenses that are less than 3% of annual income, an allowance for combined disability assistance expenses and medical expenses that is equal to the total of these expenses less 3% of annual income.</p> <p><b>*Summary of Allowable Medical Expenses from IRS Publication 502</b></p>

	<p>expenses less 3% of annual income.</p>	<p><b>Services of medical professionals, surgery and medical procedures that is necessary, legal, and non-cosmetic. Services of medical facilities, hospitalization, long-term care, and in home nursing services. Prescription medicines and insulin, but not nonprescription medicines even if recommended by a doctor. Improvements to housing directly related to medical needs (e.g., ramps for a wheelchair, handrails). Substance abuse treatment programs.</b></p>
<p>16.5 -Self-Sufficiency Incentives - Disallowance of Increase in Annual Income A, (Maximum 24 month disallowance) Page 56</p>	<p>Maximum 24 month disallowance: Once a family member is determined to be eligible for the disallowance of increased income, the 24-calendar month period starts; If the family member discontinues the employment that initially qualified the family for the disallowance of increased income, the 24-calendar month period, disallowance of increased income benefits are recalculated based on changes to family member income and employment; During the first 12-calendar month period, a PHA must exclude all increased income resulting from the qualifying employment of the family member. After the first 12-calendar month period, the PHA must exclude from annual income of the family at least 50 percent of an increase in income of such family member as a result of employment of the family member's income before the qualifying event (i.e., the family member's baseline income); The disallowance of increased income benefit is limited to a lifetime 24-month period for the qualifying family member; At the end of the 24 months, the EID ends regardless of how many months were "used". 57 The disallowance of increases in income as a result of employment under this section does not apply for purposes of admission to the program (including the determination of income eligibility and income targeting).</p>	<p>Maximum 24 month disallowance: Once a family member is determined to be eligible for the disallowance of increased income, the 24-calendar month period starts. <b>The family member's baseline income is his or her income immediately prior to qualifying for the EID. The family member's baseline income remains constant throughout the period that he or she is participating in the EID</b>                  If the family member discontinues the employment that initially qualified the family for the disallowance of increased income, the 24-calendar month period, disallowance of increased income benefits are recalculated based on changes to family member income and employment; During the first 12-calendar month period, a PHA must exclude all increased income resulting from the qualifying employment of the family member. After the first 12-calendar month period, the PHA must exclude from annual income of the family at least 50 percent of an increase in income of such family member as a result of employment of the family member's income before the qualifying event (i.e., the family member's baseline income); The disallowance of increased income benefit is limited to a lifetime 24-month period for the qualifying family member; At the end of the 24 months, the EID ends regardless of how many months were "used". 57 The disallowance of increases in income as a result of employment under this section does not apply for purposes of admission to the program (including the determination of income eligibility and income targeting).</p>
<p>Section 17.2- Acceptable Methods of Verification</p>	<p>Age, relationship, U.S. citizenship, and Social Security numbers will generally be verified with documentation provided by the family. For citizenship, the family's certification will be accepted. Citizenship documentation such</p>	<p><b>17.2 Acceptable Methods of Verification</b>  <b>In accordance with PIH Notice 2018-24,</b> age, relationship, U.S. citizenship, and Social Security numbers will generally be verified with documentation provided by the family. For citizenship, the family's certification will be accepted. Citizenship documentation such as listed</p>

<p>Page 58</p>	<p>as listed below will be required.</p> <p>Other information will be verified by third-party verification.</p>	<p>below will be required.</p> <p><b>When verifying other information such as income, assets, and/or expenses, the HACP will follow HUD’s verification hierarchy [PIH Notice 2018-18]. In general, HUD requires the PHA to use the most reliable form of verification that is available and to document the reasons when the PHA uses a lesser form of verification. If third-party verification is unavailable, the PHA must document in the family file the reason(s) why third-party verification was not available.</b></p> <p><b>In order of priority, the forms of verification that HACP will use are:</b></p> <ul style="list-style-type: none"> <li>● <b>Upfront Income Verification (UIV) using HUD’s Enterprise Income Verification (EIV) system and a non-HUD system, when available</b></li> <li>● <b>Written Third-Party Verification (may be provided by applicant or participant)</b></li> <li>● <b>Written Third-Party Verification Form</b></li> <li>● <b>Oral Third-Party Verification</b></li> <li>● <b>Tenant Declaration</b></li> </ul> <p><b>Third-party verification includes, but is not limited to, pay stubs, benefit letters, and written documentation with forms sent directly to and received directly by a source. It may also be a report generated by a request from the Housing Authority of the City of Pittsburgh or automatically by another government agency, e.g., the Social Security Administration.</b></p> <p>When <b>written</b> third-party verification cannot be obtained <b>or is not received within a reasonable timeframe, not to exceed ten (10) days</b>, the Housing Authority of the City of Pittsburgh will accept oral third-party documentation, <b>which</b> will include the same information as if the documentation had been written, e.g., name/date of contact, amount received, etc. This verification may also be direct contact with the source, in person or by telephone.</p> <p>When third-party verification cannot be obtained <b>at all and all of the other steps in the hierarchy have been exhausted</b>, the Housing Authority of the City of Pittsburgh may accept a notarized statement signed by the head, spouse or co- head, or household member’s age eighteen (18) years of age or older. Such documents will be maintained in the file.</p>
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<p>(Add) Section 19.4 - Recertification - Over Income Households Page 69</p>	<p>none</p>	<p><b>When HACP becomes aware, either through biennial or interim recertification, that a family exceeds the current year income limits as established by HUD, HACP must document the file. If after one (1) year the family continues to exceed the income limit, the family must be notified. The notification must include the following information:</b></p> <ol style="list-style-type: none"> <li><b>1. Indicate that the family income has exceeded the HUD established income limit for a period of one (1) year.</b></li> <li><b>2. If the income continues to exceed the income limit for the next 12 consecutive months, the family will be subject to a higher rent. The rent will be equal to the higher of; fair market rent or the amount of subsidy provided for the unit.</b></li> </ol> <p><b>Once the family has exceeded the income limits for two consecutive years, HACP must charge the higher rent.</b></p> <p><b>If HACP determines that a previously over income family no longer exceeds the limit either during a biennial or interim recertification, the family is no longer subject to these provisions and will be entitled to a new two-year grace period before paying a higher rent.</b></p>
<p>Appendix B-1: LIPH Applicant's Grievance Procedure V. Requesting an Informal Grievance Hearing Page 95</p>	<p>V. REQUESTING AN INFORMAL GRIEVANCE HEARING A. Time for Requesting. A complainant must request a hearing within ten (10) business days from the date the complainant learns or has reason to know their application for low income public housing has been denied or withdrawn.</p>	<p>V. REQUESTING AN INFORMAL GRIEVANCE HEARING</p> <p><b>HACP has the sole discretion to require that informal reviews be conducted remotely in accordance with due process requirements and be in compliance with HUD regulations. In addition, the PHA will conduct an informal review remotely upon request of the applicant as a reasonable accommodation for a person with a disability. The PHA will consider other reasonable requests for a remote informal review on a case-by-case basis. The PHA will provide all parties login information and/or conferencing call-in information before the review.</b></p> <p>A. Time for Requesting. A complainant must request a hearing within ten (10) business days from the date the complainant learns or has reason to know their application for low income public housing has been denied or withdrawn.</p>
<p>Appendix B-2: LIPH Tenant's Grievance Procedures VI</p>	<p>VI. REQUESTING AN INFORMAL GRIEVANCE HEARING A. Time for Requesting. A complainant must request a hearing within seven (7) days from the date the complainant learns or has reason to know of any adverse action or</p>	<p>VI. REQUESTING AN INFORMAL GRIEVANCE HEARING</p> <p><b>HACP has the sole discretion to require that informal reviews be conducted remotely in accordance with due process requirements and be in compliance with HUD regulations.</b></p>

<p>Requesting an Informal Grievance Hearing Page 105</p>	<p>inaction by the Housing Authority against the complainant, including but not limited to:</p>	<p><b>In addition, the PHA will conduct an informal review remotely upon request of the applicant as a reasonable accommodation for a person with a disability. The PHA will consider other reasonable requests for a remote informal review on a case-by-case basis. The PHA will provide all parties login information and/or conferencing call-in information before the review.</b></p> <p>A. Time for Requesting. A complainant must request a hearing within seven (7) days from the date the complainant learns or has reason to know of any adverse action or inaction by the Housing Authority against the complainant, including but not limited to:</p>
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