

**Attachment B**

**List of Proposed Discretionary Changes to the 21-22 Santa Monica Housing Authority (SMHA)  
Administrative Plan**

**Chapter 2:**

Section	2-II.E: Approval/Denial of a Requested Accommodation (p 2-9)
Current	After a request for an accommodation is presented, the PHA will respond in writing, acknowledging receipt of the request, within 10 business days.
Revised	After a request for an accommodation is presented, the PHA will respond in writing, acknowledging receipt of the request, within <i>a reasonable time not to exceed</i> 10 business days.
Reason	In some cases, SMHA may respond in less than 10 business days.
Section	2-II.E: Approval/Denial of a Requested Accommodation (p. 2-9)
Current	If the PHA denies a request for an accommodation because it is not reasonable (it would impose an undue financial and administrative burden or fundamentally alter the nature of the PHA’s operations), the PHA will discuss with the family whether an alternative accommodation could effectively address the family’s disability-related needs without a fundamental alteration to the program and without imposing an undue financial and administrative burden.
Revised	<b>Before</b> the PHA denies a request for an accommodation because it is not reasonable (it would impose an undue financial and administrative burden or fundamentally alter the nature of the PHA’s operations), the PHA will discuss with the family whether an alternative accommodation could effectively address the family’s disability-related needs without a fundamental alteration to the program and without imposing an undue financial and administrative burden.
Reason	Directs SMHA to enter into the interactive process before the initial denial of the accommodation is made.
Section	2-II.E: Approval/Denial of a Requested Accommodation (pgs. 2-7 & 2-10)
Add	Reasonable accommodation requests may be submitted to: <ul style="list-style-type: none"> <li>• Housing Specialist (if a current voucher program participant)</li> <li>• Reasonable accommodation mailbox</li> <li>• City of Santa Monica ADA Coordinator</li> </ul> Contact information for the three options above are provided on the housing authority website.
Add	Information regarding the HUD/Department of Fair Employment and Housing complaint process can be found on the housing authority website.
Reason	To clarify the process and contact information regarding requests for reasonable accommodation, and the HUD/DFEH complaint process.

**Chapter 5:**

Section	5-II.B: Determining Family Unit (Voucher) Size (p. 5-11)														
Revised	<p><u>PHA Policy</u></p> <p>The PHA will assign one bedroom for each two persons within the household, except in the following circumstances:</p> <p style="padding-left: 40px;">Single person families will be allocated a zero or 1-bedroom</p> <p style="padding-left: 40px;">Space will not be provided for any family member who is absent from the home in excess of 90 consecutive days per calendar year.</p> <p style="padding-left: 40px;">The number of bedrooms on the voucher cannot be more than the number of persons in the household.</p> <p><b>At admission</b> the PHA will reference the following chart in determining the appropriate voucher size for a family:</p> <table data-bbox="535 798 1250 1260" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Voucher Size</th> <th style="text-align: center;">Persons in Household (Minimum – Maximum)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">0 Bedroom</td> <td style="text-align: center;">1-2</td> </tr> <tr> <td style="text-align: center;">1 Bedroom</td> <td style="text-align: center;"><b>1-3</b></td> </tr> <tr> <td style="text-align: center;">2 Bedrooms</td> <td style="text-align: center;"><b>3-5</b></td> </tr> <tr> <td style="text-align: center;">3 Bedrooms</td> <td style="text-align: center;"><b>5-7</b></td> </tr> <tr> <td style="text-align: center;">4 Bedrooms</td> <td style="text-align: center;"><b>7-9</b></td> </tr> <tr> <td style="text-align: center;">5 Bedrooms</td> <td style="text-align: center;"><b>9-11</b></td> </tr> </tbody> </table> <p><u>PHA Policy</u></p> <p>If a family reports a reduction in family size which would result in there being less than one person per bedroom, the household will be given notice that they have 12 months to search for a new unit and referred to opportunities available in other Santa Monica affordable housing programs, such as the Affordable Housing Production Program. At the end of the 12 months, the subsidy size will be reduced to no more than one bedroom per person unless necessary by reasonable accommodation. Proof of effort must be provided at annual recertification</p>	Voucher Size	Persons in Household (Minimum – Maximum)	0 Bedroom	1-2	1 Bedroom	<b>1-3</b>	2 Bedrooms	<b>3-5</b>	3 Bedrooms	<b>5-7</b>	4 Bedrooms	<b>7-9</b>	5 Bedrooms	<b>9-11</b>
Voucher Size	Persons in Household (Minimum – Maximum)														
0 Bedroom	1-2														
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3 Bedrooms	<b>5-7</b>														
4 Bedrooms	<b>7-9</b>														
5 Bedrooms	<b>9-11</b>														
Reason	SMHA has amended and reordered this section of the Administrative Plan to clarify PHA policy regarding voucher size at admission versus voucher size when there is a reduction in the size of an existing participant household.														

**Chapter 10:**

Section	10-II.B: Restrictions on Moves (p. 10-5)
Remove	<del>The PHA will not approve a family's request for a voucher if the PHA has previously issued a voucher within any 12 month period.</del>
Reason	Policy restricts a participant family's opportunity to move.

**Chapter 17:**

Section	Solicitation and Selection of PBV Proposals (p. 17-6)
Add:	<u>PHA Policy</u> A proposal submitted for a unit occupied by an existing tenant must include documentation that the tenant has occupied the unit for a minimum of twelve consecutive months.
Reason	Adding language to ensure approval of project-based applications is consistent with prioritization of longer-term Santa Monica residents who have become rent burdened, and to ensure compliance with the use of the existing voucher waitlists.

**Chapter 19:**

Section	Part VI: Income and Subsidy Determinations (p.19-11)
Add	RENT AT LEASE UP: CoC voucher holders may rent units at or below the Fair Market Rent (FMR) for the area. Santa Monica is part of Los Angeles County and the Los Angeles County FMRs apply. However, since the SMHA has been approved by HUD for an exception payment standard, which is above the Los Angeles County FMRs, the Continuum of Care participants may rent apartments at or below the SMHA payment standard at lease up, as long as the rent amount meets the rent reasonableness requirement. (p. 19-11)
Reason	Adding language to clarify that CoC voucher holders may lease up at or below the Exception Payment Standard.

**Chapter 21:**

**Adding Chapter 21: Emergency Housing Vouchers (EHV) – Temporary Policy Supplement**

On March 11, 2021, President Biden signed the American Rescue Plan Act of 2021 (ARP) (P.L. 117-2). Section 3202 of the ARP appropriated \$5 billion for the creation, administration, and renewal of new incremental emergency housing vouchers (EHVs) and other eligible expenses related to COVID-19. SMHA was allocated 104 EHV's. This chapter describes HUD regulations and PHA policies for administering EHVs. Except as addressed by this chapter and as required under federal statute and HUD requirements, the general requirements of the HCV program apply to EHV.