



**Housing Choice Voucher**  
**Administrative Plan**

**Revised 6-06**

## Table of Contents

<b>Introduction</b>	<b>Page 3</b>
<b>Overview</b>	<b>Page 3</b>
<b>Selection for the Waitlist</b>	<b>Page 7</b>
<b>Issuing and Denying Voucher</b>	<b>Page 8-9</b>
<b>Special Funding</b>	<b>Page 9</b>
<b>Occupancy Rules</b>	<b>Page 10-11</b>
<b>Owner Outreach</b>	<b>Page 12</b>
<b>Discrimination Complaints</b>	<b>Page 13</b>
<b>Information to Owners</b>	<b>Page 14</b>
<b>Disapproval of Owners</b>	<b>Page 15</b>
<b>Subsidy Standards</b>	<b>Page 16</b>
<b>Absence from Dwelling Unit</b>	<b>Page 17-18</b>
<b>Family Break-Up</b>	<b>Page 19</b>
<b>Informal Reviews</b>	<b>Page 20</b>
<b>Informal Hearings</b>	<b>Page 21</b>
<b>Payment Standards</b>	<b>Page 22</b>
<b>Minimum Rent</b>	<b>Page 22</b>
<b>Rent Reasonableness</b>	<b>Page 23</b>
<b>Special Housing Types</b>	<b>Page 24</b>
<b>Family and Owner Debts to the IHA</b>	<b>Page 25</b>
<b>Interim Reexaminations</b>	<b>Page 26</b>
<b>Restrictions on the Number of Moves</b>	<b>Page 27</b>
<b>Portability Procedures</b>	<b>Page 28-29</b>
<b>Administrative Fee Reserve</b>	<b>Page 30</b>
<b>Housing Quality Standards</b>	<b>Page 31-32</b>
<b>Screening for Behavior and Suitability</b>	<b>Page 33</b>
<b>Homeownership Addendum</b>	<b>Page 34-47</b>
<b>Project Based Assistance Addendum</b>	<b>Page 48-49</b>
<b>FSS Plan</b>	<b>Page 50-61</b>

**Overview of the Program and Plan** (adopted from the Nan McKay Administrative Plan Model)  
**(24 CFR part 5; 24 CFR part 8; 24 CFR part 982)**

**Introduction**

The Indianapolis Housing Agency (IHA) receives its funding for the Housing Choice Voucher (HCV) program from the U.S Department of Housing and Urban Development (HUD). The IHA is not a federal department of agency. The housing agency is a government or public body, created tank authorized by the state to develop and operate housing programs for low-income families. The IHA enters into an Annual Contributions Contract with HUD to administer the program requirements and notices and must establish policy and procedures to clarify federal requirements and to ensure consistency in program operation

**Overview**

I. Organization and Structure of the IHA

The Section 8 tenant-based Housing Choice Voucher (HCV) assistance program is funded by the federal government and administered by the Indianapolis Housing Agency (IHA) for the jurisdiction of the City of Indianapolis/ County of Marion.

The officials of the IHA are known as commissioners or, collectively, as the board of commissioners. Commissioners are appointed in accordance with state housing law and generally serve in the same capacity as the directors of a corporation, establishing policies under which the IHA conducts business, ensuring that policies are followed by the IHA staff and ensuring that he IHA is successful in its mission. The board is responsible for preserving and expanding the agency's continued viability.

Formal actions of the IHA are taken through written resolutions, adopted by the board of commissioners and entered into official records of the IHA.

The principal staff member of the IHA is the executive director (E.D.), hired and appointed by the board of commissioners. The executive director is directly responsible for carrying out the policies established by the commissioners and is delegated the responsibility for hiring, training and supervising the remainder of the IHA's staff in order to manage the day-to-day operations of the IHA to ensure compliance with federal and state laws and directives for the programs managed. In addition, the executive director's duties include budgeting and financial planning for the agency.

II. IHA Mission

Our mission is to be a top-performing agency that: provides quality and affordable housing; contributes to safe communities; encourages individual and family self-sufficiency; and affirmatively promotes fair housing.

III. IHA Programs

The IHA's administrative plan is applicable to the operation of the Housing Choice Voucher program.

IV. Overview and History of the Housing Choice Voucher Program

The United States Housing Act of 1937 (the “act”) is responsible for the birth of federal housing program initiatives. The Act was intended to provide financial assistance to states and cities for public works projects, slum clearance and the development of affordable housing developments for low-income residents.

The Housing and Community Development (HCD) Act of 1974 created a new federally assisted housing program—Section 8 Existing program (also known as the Section 8 Certificate program). The HCD Act represented a significant shift in federal housing to privately owned rental housing.

Under the Certificate program federal housing assistance payments were made directly to private owners of rental housing, where this housing was made available to lower-income families. Eligible families were able to select housing in the private rental market. Assuming that the housing met certain basic physical standards of quality (“housing quality standards”) and was within certain HUD-established rent limitations (“fair market rents”), the family would be able to receive rental assistance in the housing unit. Family contributions to rent was generally set at 30 percent of the family’s adjusted income, with the remainder of the rent paid by the program.

Another unique feature of the Certificate program was that the rental assistance remained with the eligible family, if the family chose to move to another privately owned rental unit that met program requirements (in contrast to public housing where the rental assistance remains with the unit, should the family decide to move). Consequently, the Certificate program was characterized as tenant-based assistance, rather than unit-based assistance.

The Housing and Community Development (HCD) Act of 1987 authorized a new version of tenant-based assistance—the Section 8 Voucher program. The Voucher program was very similar to the Certificate program in that eligible families were able to select housing in the private rental market and receive assistance in that housing unit.

However, the Voucher program permitted families more options in housing selection. Rental housing still had to meet basic housing standards, but there were no fair market rent limitation on rent. In addition, family contribution to rent was not set at a limit of 30 percent of adjusted income. Consequently, depending on the actual rental cost of the unit selected, a family might pay more or less than 30 percent of their adjusted income for rent.

From 1987 through 1999, public housing agencies managed both the Certificate and Voucher tenant-based assistance programs, with separate rules and requirements for each. From 1994 through 1998, HUD published a series of new rules, known as “conforming rules”, to more closely combine and align the two similar housing programs, the extent permitted by the law.

In 1998, the Quality Housing and Work Responsibility Act (QHWRA)—also known as Public Housing Reform Act—was signed into law. QHWRA eliminated all statutory differences between the Certificate and Voucher tenant-based programs and required that the two programs be merged into a single tenant-based assistance program, known as the Housing Choice Voucher (HCV) program.

The HCV program was modeled closely in the pre-merger Voucher program. However, unlike the pre-merger Voucher program, the HCV program requires an assisted family to pay at least 30 percent of adjusted income for rent.

The transition of assistance from the Certificate and Voucher programs to the new HCV program began in October 1999. By October 2001, all families receiving tenant-based assistance were converted to the HCV program.

#### V. Program Basics

The purpose of the HCV program is to provide rental assistance to eligible families. The rules and regulations of the HCV program are determined by the U.S. Department of Housing and Urban Development. The IHA is afforded choices in the operation of the program, which are included in the IHA’s administrative plan, a document approved by the board of commissioners of the IHA.

The HCV program offers mobility to eligible families because they may search for suitable housing anywhere in the IHA’s jurisdiction and may also be eligible to move under portability to other IHA’s jurisdiction.

When a family is determined to be eligible for the program and funding is available, the IHA issues the family a housing voucher. When the family finds a suitable housing unit and funding is available, the IHA will enter into a contract with the owner and the family will enter into a lease with the owner. Each party makes their respective payment to the owner so that the owner receives full rent.

Even though the family is determined to be eligible for the program, the owner has the responsibility of approving the family as a suitable renter. The IHA continues to make payments to the owner as long as the family is eligible and the housing unit continues to qualify under the program.

## VI. HCV Partnerships

To administer the HCV program, the IHA enters into a contractual relationship with HUD. The IHA also enters into contractual relationships with the assisted family and the owner or landlord of the housing unit.

For the HCV program to work and be successful, all parties involved—HUD, the IHA, the owner and the family—have important roles to play. The roles and responsibilities of all parties are defined in federal regulations and in legal documents that parties execute to participate in the program.

What does HUD do?

HUD had the following major responsibilities:

- Develop regulations, requirements, handbooks, notices and other guidance to implement HCV housing program legislation passed by Congress;
- Allocate HCV program funds to IHA;
- Provide technical assistance to IHA in interpreting and applying HCV program requirements;
- Monitor IHA compliance with HCV program requirements and IHA performance in program administration.

What does the IHA do?

The IHA administers the HCV program under contract with HUD and has the following major responsibilities:

- Establish local policies;
- Review applications from interested applicant families to determine whether applicants are eligible for the program;
- Maintain waiting list and select families for admission;
- Issue voucher to selected family and, if necessary, assist the family in finding a place to live;
- Conduct outreach to owners, with special attention to owners outside of poverty or minority concentration;
- Approve the rental unit (including assuring compliance with housing quality standards and rent reasonableness), the owner, and the tenancy;
- Make housing assistance payments to the owner in a timely manner;
- Ensure that families and their rental units continue to qualify under the program;
- Ensure that owners and families comply with the program rules;
- Provide families and owners with prompt, professional service;
- Comply with all fair housing and equal opportunity requirements, HUD regulations and requirements, the Annual Contributions contract, HUD-approved applications for funding, the IHA's administrative plan, and other applicable federal, state and local laws.

What does the Owner do?

The owner has the following major responsibilities:

- Screen families who apply for tenancy, to determine if they will be good renters
  - The IHA can provide some information to the owner, but the primary responsibility for tenant screening rests with the owner
  - The owner should consider family background factors such as rent and bill-paying history, history of caring for property, respecting the rights of others to peaceful enjoyment of the property, compliance with essential conditions of tenancy, whether the family is engaging in drug-related criminal activity or other criminal activity that might threaten others;
- Comply with the terms of the Housing Assistance Payments contract, executed with IHA;

- Comply with all applicable fair housing laws and discriminate against no one;
- Maintain the housing unit by making necessary repairs in a timely manner;
- Collect rent due from the assisted family and otherwise comply with and enforce provisions of the dwelling lease.

What does the family do?

The family has the following responsibilities:

- Provide the IHA with complete and accurate information, determined by the IHA to be necessary for administration of the program;
- Make their best and most timely efforts to find a place to live that is suitable for them and that qualifies for the program;
- Cooperate in attending all appointments scheduled by IHA;
- Allow the IHA to inspect the unit at reasonable times and after reasonable notice;
- Take responsibility for care of the housing unit, including any violations of housing quality standards caused by the family;
- Comply with the terms of the lease with the owner;
- Comply with the family obligations of the voucher (listed on the voucher);
- Not commit serious or repeated violations of the lease;
- Not engage in drug-related or violent criminal activity;
- Notify the IHA and the owner before moving or terminating the lease;
- Use the assisted unit only for residence and as the sole residence of the family; Not sublet the unit, assign the lease, or have any interest in the unit;
- Promptly notify the IHA of any changes in family composition;
- Not commit fraud, bribery, or any other corrupt or criminal act in connection with any housing programs.

If all parties fulfill their obligations in a professional and timely manner, the program responsibilities will be fulfilled in an effective manner.

## **SELECTION FROM THE WAIT LIST** (24 CFR 982.54 (d) (1))

*[Selection and admission of applicants from the PHA waiting list, including any PHA admission preferences, procedures for removing applicant names from the waiting list, and procedures for closing and reopening the PHA waiting list]*

The Indianapolis Housing Agency administers its tenant based wait list as required by HUD regulations (24 CFR 982.204). To qualify for placement on the wait list, the applicant must qualify as a family. The definition of family (for the purpose of this administrative plan) is defined on page 4.

The family must designate a head of household. The head of household is the adult member of the household who is responsible for conducting the family's business with the Indianapolis Housing Agency and has the legal capacity to enter into a lease under Indiana law. Minors who have been emancipated by a recognized court of law may be recognized as head of household.

### **Selection from Tenant Based Wait List**

Applicant families will be selected from the wait list in sequence as determined by lottery selection and verified preferences.

### **Income Targeting**

To be eligible for assistance, an applicant must have annual income that does not exceed the very low-income limits (at or below 50% of area median) for occupancy as determined and published by HUD.

### **Admission Preferences**

The Indianapolis Housing Agency preference system is used to establish the order of placement on the waiting list, not to guarantee admission. Preferences will be granted to applicants who are otherwise qualified and who, at the time they are certified for admission, meet definitions of the preference(s) described below:

#### **National and/or State Disaster Affected Families-**

Individuals or families displaced by a natural disaster, so declared by the President of the United States and/or the Governor of Indiana, shall receive preference. Priority will be given to individuals or families who had Section 8 housing choice vouchers at the time they were displaced by the natural disaster.

#### **Involuntary Displacement by Government Action**

Individuals or families displaced as a direct result of an action carried on by an agency of the United States or by any State or local government body or agency in connection with code enforcement, public improvement or development program may qualify for priority placement on the waiting list. However, the Executive Director shall have the discretion to determine whether the government action warrants such a preference on a case-by-case determination of the extent, cause, effect and consequence of the government action. If the Executive Director determines that the government action warrants a priority preference, said preference shall apply for all individuals or families affected by that particular government action provided they qualify in all other respects.

Persons who meet these preference criteria may apply for Section 8 housing choice voucher assistance at any time.

### **Opening the Tenant Based Wait List**

The Indianapolis Housing Agency announces the reopening of the tenant-based wait list in accordance with HUD requirements. Announcements are advertised through public notice in newspapers of general circulation, minority publications and media entities. The notice contains a brief description the dates, times and locations where families may apply. The waiting list will remain open long enough to achieve a waiting list adequate to cover projected turnover and new allocations.

Closing the Tenant Based Wait List

The public notice that announces the reopening of the tenant based wait list will include the length of time that applications will be accepted. Applications will be accepted up to the close of business on the date announced in the public notice. For the purpose of this administrative plan, applications that are post marked on or before the closing date will be accepted. At no time will an application that is submitted by U.S. Mail be accepted later than 10 calendar days after the closing date of the waiting list. The Indianapolis Housing Agency does not accept any liability or responsibility for applications that are lost and/or misdirected by the U.S. Post Office.

## **ISSUING AND DENYING VOUCHERS** (24 CFR 982.54 (d) (2))

[Issuing or denying vouchers, including PHA policy governing the voucher term and any extensions or suspensions of the voucher term. "Suspension" means stopping the clock on the term of a family's voucher after the family submits a request for approval of the tenancy. If the PHA decides to allow extensions or suspensions of the voucher term, the PHA administrative plan must describe how the PHA determines whether to grant extensions or suspensions, and how the PHA determines the length of any extension or suspension]

### **Issuing and Denying Vouchers (Initial Eligibility)**

When funding is available, the Indianapolis Housing Agency will issue vouchers to applicants whose eligibility has been determined. To the extent necessary, the Indianapolis Housing Agency will over-issue vouchers to achieve maximum occupancy/utilization.

The full HUD-required briefing is conducted for applicant families who are determined to be eligible for assistance. To the extent practicable, briefings will be conducted in groups. Individual briefings will be conducted for applicants as necessary or as a reasonable accommodation for a person with a disability. Applicants who fail to attend two (2) scheduled voucher issuance briefings, without prior notification and approval from the Indianapolis Housing Agency will be denied admission to the Housing Choice Voucher Program for violation of family obligations (failure to supply needed information for certification).

In the case of non-resident applicants, where neither the applicant nor the spouse of the applicant had a "domicile" (legal residence) in IHA's jurisdiction when application was made, the following will apply:

- The family may lease a unit anywhere in the jurisdiction of IHA
- The family will not have the right to portability (during the initial 12 months following the issuance of the voucher)
- Exceptions may be made for families receiving vouchers due to HUD special admissions

### **Issuing and Denying Vouchers (Moves)**

A move briefing will be conducted for participants to be reissued a voucher to move from one assisted unit to another. All participating families who have not been recertified within the past 120 days will be required to attend a recertification briefing. The recertification briefing will be conducted at the same time as the move briefing. To the extent practicable, briefings will be conducted in groups. Individual briefings will be conducted as necessary or as a reasonable accommodation for a person with a disability. Participants who fail to attend the scheduled move voucher issuance briefings, without prior notification and approval from the Indianapolis Housing Agency will be required to resubmit a request to move.

The time frame for scheduling briefings (for participants) may vary depending on the volume of moves being requested.

IHA may deny request for families wishing to relocate to higher costs units as deemed necessary due to budget constraints.

Participating families who owe money to the Indianapolis Housing Agency or any other housing agency/authority will be denied the opportunity to move until the balance owed is paid in full.

Participants who are in the first year of their assisted lease will be denied the opportunity to move with continued assistance. However, participants may be reissued a voucher within 60 days of the expiration of the first year of the lease.

### **Voucher Term and Extensions**

The initial term of a Housing Choice Voucher for an applicant is 60 days. At the written request of the family, the Indianapolis Housing Agency may extend the term of the voucher an additional 30 days. The request for extension will only be considered for families who demonstrate and are able to verify extenuating circumstances. At no time will the Indianapolis Housing Agency extend a voucher beyond 90 calendar days except where providing reasonable

accommodations for a person with disabilities. The Indianapolis Housing Agency will not suspend (toll) the number of days required to process the request for tenancy approval.

Special Admissions as designated by a HUD directive (such as HUD relocations, foreclosures, demolition, disposition, etc.) may require additional extensions on a project-by-project and/or case-by-case basis.

If the voucher expires and is not extended or expires after an extension, the family will be denied assistance. The family is not entitled to an informal review/hearing when a voucher expires.

The initial term of a Housing Choice Voucher for a participant is 120 days. At the written request of the family, the Indianapolis Housing Agency will extend the term of the voucher up to an additional 60 days. At no time will the Indianapolis Housing Agency extend a voucher beyond 180 calendar days. The Indianapolis Housing Agency will not suspend (toll) the number of days required to process the request for tenancy approval. Participants who have not located a new unit may remain in their unit if there is an assisted lease/HAP Contract in effect. If the family vacates their assisted unit during their search time, no extensions will be granted.

**SPECIAL FUNDING** (24 CFR 982.54 (d) (3))

*[Any special rules for use of available funds when HUD provides funding to the PHA for a special purpose (e.g., desegregation), including funding for specified families or a specified category of families]*

**Special Rules**

The Indianapolis Housing Agency administers all programs in accordance with HUD requirements. Special admission applicants will be admitted outside of the regular waiting list process. Applicants do not have to qualify for any preferences, nor are they required to be on the wait list. The Indianapolis Housing Agency maintains separate records of these admissions.

## **OCCUPANCY POLICIES** (24 CR 982.54 (d) (4))

*[Occupancy policies, including:*

*(i) Definition of what group of persons may qualify as a "family";*

*(ii) Definition of when a family is considered to be "continuously assisted";*

*(iii) Standards for denying admission or terminating assistance based on criminal activity or alcohol abuse in accordance with § 982.553]*

### **Definition of Family**

For the purpose of this administrative plan, a family is defined as a single person (including an elderly or disabled person) or two or more persons who intend to share residency whose income and resources are available to meet the household needs.

### **Definition of Continuously Assisted**

An applicant is continuously assisted under the 1937 Housing Act if the family is already receiving assistance under any 1937 Housing Act program when the family is admitted to the housing choice voucher program. A family is not considered "continuously assisted" if it has not participated in a program under the 1937 Housing Act for a period of 180 calendar days or longer.

### **Standards for Denying Admission or Terminating Assistance Based on Criminal Activity or Alcohol Abuse**

It is the policy of the Indianapolis Housing Agency to conduct a criminal background check at the following times:

- all applicants (including ports, special admissions, etc.)
- at the request to add an adult (18 years of age or older) to the household
- accusation of criminal involvement
- as part of quality control of file (random selection of files pulled for quality control of recertifications)

including all adult household members. Background checks are used to determine whether applicants and participants are eligible to participate in the program. All screening and termination of assistance procedures of the Indianapolis Housing Agency are administered fairly and in such a way as not to violate rights to privacy or discriminate on the basis of race, color, nationality, religion, familial status, disability or other legally protected group(s).

It is the policy of the Indianapolis Housing Agency to deny participation in the program to applicants and terminate assistance to participants in cases where it can be reasonably determined that a household member is illegally using a drug or if a person abuses alcohol in a way that may interfere with the health, safety or right to peaceful enjoyment by other residents. The Indianapolis Housing Agency will also deny or terminate assistance when it can be determined that there is a pattern of illegal use of a drug or a pattern of alcohol abuse. For the purpose of this administrative plan, the Indianapolis Housing Agency will consider the use of a controlled substance or alcohol to be a pattern if there are one or more incidents during the previous five (5) years. In evaluating evidence of negative past behavior, the Indianapolis Housing Agency will give fair consideration to the seriousness of the activity with respect to how it would affect other residents, and/or likelihood of favorable conduct in the future which could be supported by evidence of rehabilitation.

"Engaged in or engaging in" violent or drug related criminal activity means any act within the past five (5) years by an applicant or participant or household member which involved criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage.

The use of public records, including, but not limited to police reports, court records and news media reports may be used to determine if an applicant, participant or household member has engaged in or is engaging in drug related and/or violent criminal activity. For the purpose of this administrative plan, an arrest or conviction is not required to determine if an applicant, participant or household member has engaged in violent criminal activity.

Assistance in the Housing Choice Voucher Program will be denied or terminated if the head of household or any member of the household:

- Is subject to a lifetime registration requirement under a State sex offender registration program; and/or
- Has engaged in any criminal activity that has resulted in the negligible death of any person; and/or
- Has engaged in any criminal activity that has as one of its elements sexual assault and/or abuse; and/or
- Has been evicted from public or assisted housing for any lease or family obligation violation (will be denied for up to a minimum of three years from said eviction) and/or
- Has engaged in the manufacturing, distribution, or use of methamphetamine

**OWNER OUTREACH** (24 CFR 982.54 (d) (5))

*[Encouraging participation by owners of suitable units located outside areas of low income or minority concentration]*

At voucher issuance briefings, families are encouraged to search for housing in non-impacted areas. It is the policy of the Indianapolis Housing Agency to assist families who choose to seek housing opportunities. The assistance provided includes, but is not limited to:

- Provide families with a search record form to gather and record information
- Make direct contact with landlords/managers
- Provide mobility counseling to families
- Provide information about the services available in all areas of the community
- Meet with neighborhood groups to promote the benefits of the housing choice voucher program
- Conduct formal and informal discussions with landlord associations
- Meet with agencies and groups that promote fair housing

**DISCRIMINATION COMPLAINTS** (24 CFR 982.54 (d) (6))

*[Assisting a family that claims that illegal discrimination has prevented the family from leasing a suitable unit]*

It is the policy of the Indianapolis Housing Agency to assist families who claim illegal discrimination. All applicants and participants are provided a copy of the HUD brochure entitled, "Fair Housing It's Your Right." A copy of the discrimination complaint form (form HUD-903) is also provided.

The Indianapolis Housing Agency will assist families in the completion and submission of the discrimination complaint form. In addition, and when appropriate, families will be referred to community organizations who enforce fair housing laws.

**INFORMATION TO OWNERS** (24 CFR 982.54 (d) (7))

*[Providing information about a family to prospective owners]*

It is the policy of the Indianapolis Housing Agency to provide a potential owner the family's current and prior address as shown in our records, and the name and address (if known) of the landlord at the family's current and prior address.

The Indianapolis Housing Agency will not provide an owner any information regarding the family's criminal history. The Indianapolis Housing Agency reserves the right to provide previous tenancy history to potential owners for tenants who currently or previously occupied Indianapolis Housing Agency owned/operated properties.

**DISSAPPROVAL OF OWNERS** (24 CFR 982.54 (d) (8))

*[Disapproval of owners]*

The owner does not have a right to participate in the Housing Choice Voucher Program. For purposes of this section, “owner” includes a principal or other interested party.

The Indianapolis Housing Agency reserves the right to disapprove owners for any of the following reasons:

- The owner has violated obligations under a housing assistance payments contract under Section 8 of the 1937 Act (42 U.S.C. 1437f).
- The owner has committed fraud, bribery or any other corrupt act in connection with any Federal housing program.
- The owner has engaged in drug-related criminal activity or any violent criminal activity.
- The owner has a history or practice of non-compliance with the HQS for units leased under the tenant-based programs or with applicable housing standards for units leased with project-based Section 8 assistance or leased under any other Federal housing program.
- The owner has a history or practice of renting units that fail to meet State and/or local housing codes.
  - The owner has a history or practice of failing to terminate tenancy of tenants of units assisted under Section 8 or any other federally assisted housing program for activity by the tenant, any member of the household, a guest or another person under the control of any member of the household that:
    - Threatens the right to peaceful enjoyment of the premises by other residents;
    - Threatens the health or safety of other residents, of employees of the Indianapolis Housing Agency, or of owner employees or other persons engaged in management of the housing.
    - Threatens the health or safety of, or the right to peaceful enjoyment of their residences, by persons residing in the immediate vicinity of the premises; or
    - Is drug-related criminal activity or violent criminal activity;
- The owner has not paid State or local real estate taxes, fines or assessments.
- The owner has failed to comply with regulations, the mortgage or note, or the regulatory agreement for projects with mortgages insured by HUD or loans made by HUD.

## **SUBSIDY STANDARDS** (24 CFR 982.54 (d) (9))

### *[Subsidy standards]*

Subsidy standards are standards established by the Indianapolis Housing Agency to determine the appropriate number of bedrooms and the amount of subsidy for families of different sizes and compositions. The Indianapolis Housing Agency does not determine who shares bedrooms/sleeping rooms.

All standards in this section relate to the number of bedrooms on the voucher, not the family's actual living arrangements.

Subsidy standards must:

- Provide for the smallest number of bedrooms needed to house a family without overcrowding
- Be applied consistently to all families of like size and composition
- Be consistent with space requirements under the housing quality standards 24 CFR 982.401(d)

The family unit size is the number of bedrooms needed for families of different sizes and compositions, and is used to determine the maximum rent subsidy for the family.

**It is the general policy of the Indianapolis Housing Agency to assign one bedroom on the voucher for each two family members**, with the exception of the head of household. Exceptional factors such as age and medical may be considered when assigning the number of bedrooms on the voucher.

Additional exceptions include:

- A child who is temporarily away from home because of placement in foster care will be given consideration
- Foster children will be considered in determining unit size only if verification is provided stating the children will be in the unit for more than 12 months
- Live-in attendants, who reside with the assisted family, will generally be provided a separate bedroom. No additional bedrooms are provided for the attendant's family.
- Space will not be provided for a family member, other than a spouse, who will be absent most of the time, such as a member who is away in the military.
- A single pregnant woman with no other family members will be allocated a two-bedroom voucher.
- A single person household will be allocated a one-bedroom voucher.

The family may request an exception to the subsidy standards on the basis of health, handicap, and age (elderly). Such request must be made in writing within 10 days of the issuance of the voucher. The request must explain the need or justification for a different bedroom size designation. Documentation verifying the need or justification will be required. A knowledgeable medical professional must verify requests based upon health reasons. All requests are subject to the approval of the Indianapolis Housing Agency.

The Indianapolis Housing Agency will not issue or consider a larger voucher due to additions of family members other than by birth, adoption, marriage or court awarded custody (in these instances legal documentation must be provided).

## **ABSENCE FROM DWELLING UNIT** (24 CFR 982.54 (d) (10))

*[Family absence from the dwelling unit]*

The Indianapolis Housing Agency must compute all applicable income of every family member who is on the lease, including those who are temporarily absent. In addition, the income of the spouse or the head of the household if that person is temporarily absent, even if that person is not on the lease must be counted.

“Temporarily absent” is defined as away from the unit for more than 180 days. Income of persons permanently absent will not be counted. If the spouse is temporarily absent and in the military, all military pay and allowances (except hazardous duty pay when exposed to hostile fire and any other exceptions to military pay HUD may define) is counted as income.

It is the responsibility of the head of household to report changes in family composition. The Indianapolis Housing Agency will evaluate absences from the unit using this policy.

### **Absence of Any Member**

Any member of the household will be considered permanently absent if s/he is away from the unit for 30 days except as otherwise provided in this section.

### **Absence due to Medical Reasons**

If any family member leaves the household to enter a facility such as hospital, nursing home, or rehabilitation center, the Indianapolis Housing Agency will seek advice from a reliable qualified source as to the likelihood and timing of their return. If the verification indicates that the family member will be permanently confined to a nursing home, the family member will be considered permanently absent. If the verification indicates that the family member will return in less than 180 consecutive days, the family member will not be considered permanently absent.

If the person who is determined to be permanently absent is the sole member of the household, assistance will be terminated in accordance with the “Absence of Entire Family” section below.

### **Absence Due to Full-time Student Status**

A student (other than head of household or spouse) who attends school away from home but lives with the family during school recesses may, at the family's choice, be considered either temporarily or permanently absent. If the family decides that the member is permanently absent, income of that member will not be included in total household income, the member will not be included on the lease and the member will not be included for determination of voucher size. Conversely, if a family decides that the member is temporarily absent, income of that member will be included in the total household income, the member will be included on the lease and the member will be included for the determination of voucher size.

### **Absence due to Incarceration**

If the sole member is incarcerated for more than 30 days, s/he will be considered permanently absent. Any member of the household, other than the sole member, will be considered permanently absent if s/he is incarcerated for 30 days. The Indianapolis Housing Agency will determine if the reason for incarceration is for drug-related or violent criminal activity, or any other violation of a family obligation.

### **Absence of Children due to Placement in Foster Care**

If the family includes a child or children temporarily absent from the home due to placement in foster care, the Indianapolis Housing Agency will determine from the appropriate agency when the child/children will be returned to the home. If the time period is to be greater than 180 days from the date of removal of the children, the voucher size will be reduced at the next annual reexamination. If all children are removed from the home permanently, the voucher size will be reduced in accordance with the subsidy standards at the next annual reexamination.

### **Absence of Entire Family**

These policy guidelines address situations when the family is absent from the unit, but has not moved out of the unit. In cases where the family has moved out of the unit, the Indianapolis Housing Agency will terminate assistance in accordance with appropriate termination procedures contained in this Plan. Families are required both to notify the

Indianapolis Housing Agency before they move out of a unit and to give information about any family absence from the unit.

The family will supply any information or certification requested by the Indianapolis Housing Agency to verify that the family is living in the unit, or relating to family absence from the unit, including any requested information or certification on the purposes of family absences. The family will cooperate with the Indianapolis Housing Agency for this purpose. If the family will be absent from the unit for more than 30 days it will promptly, but no more than 21 calendar days from the first day of absence, notify both the owner and the Indianapolis Housing Agency in writing. The Indianapolis Housing Agency will evaluate the request and provide a written response to the family.

To obtain Indianapolis Housing Agency approval, the family will:

- Satisfy notice requirements; and
- Provide documentation acceptable to the IHA regarding the length of absence and the reason for the absence; and
- Affirm their intent to return to the unit at the end of the leave period; and
- Agree to be responsible for receiving and responding to all notices sent by the IHA to the unit during periods of absence; and
- Pay rent to the owner and pay for utilities while they are absent; and
- Make arrangements for the unit to be available for IHA inspections as necessary.

If this procedure is not followed, the unit will be considered abandoned and the Indianapolis Housing Agency will terminate housing assistance payments and the family's participation in the program. HUD regulations require the Indianapolis Housing Agency to terminate assistance if the entire family is absent from the unit for a period of more than 180 consecutive calendar days.

"Absence" means that no family member is residing in the unit. In order to determine if the family is absent from the unit, the Indianapolis Housing Agency may:

- Write letters to the family at the unit
- Telephone the family at the unit
- Verify if utilities are in service
- Check with the post office

The Indianapolis Housing Agency reserves the right to extend any deadline listed in this section as an accommodation to persons with disabilities. In cases where housing assistance is terminated, the Indianapolis Housing Agency reserves the right to reinstate assistance as an accommodation to persons with disabilities. At no time will the Indianapolis Housing Agency extend absences that are in excess of 180 days.

**FAMILY BREAK-UP** (24 CFR 982.54 (d) (11))

*[How to determine who remains in the program if a family breaks up]*

In those instances when a family assisted under the Housing Choice Voucher Program becomes divided into two otherwise eligible families due to divorce, legal separation, or the division of the family, and the new families cannot agree as to which new family unit should continue to receive the assistance, and there is no determination by a court, the Section 8 Director will consider the following factors to determine which of the families will continue to be assisted:

- Which of the two new family units has custody of dependent children.
- Which family member was the head of household when the voucher was initially issued (listed on the initial application).
- The composition of the new family units, and which unit contains elderly or disabled members.
- Whether domestic violence was involved in the breakup.
- Which family members remain in the unit.
- Recommendations of social service professionals.

Documentation of these factors will be the responsibility of the requesting parties.

If documentation is not provided, the Indianapolis Housing Agency may terminate assistance on the basis of failure to provide information necessary for a certification and/or recertification.

**INFORMAL REVIEWS** (24 CFR 982.54 (d) (12))

*[Informal review procedures for applicants]*

It is the policy of the Indianapolis Housing Agency to conduct Informal Reviews in the same manner as Informal Hearings.

**INFORMAL HEARINGS** (24 CFR 982.5 (d) (13))

*[Informal hearing procedures for participants]*

It is the policy of the Indianapolis Housing Agency to ensure that all families have the benefit of all protections due to them under the law. This policy defines the Informal Hearing procedures for applicants and participants.

It is the objective of the Indianapolis Housing Agency to resolve disputes at the lowest level possible. When disputes cannot be resolved and a hearing is required by regulation, an informal hearing will be scheduled. Applicants and participants who disagree with a determination of the Indianapolis Housing Agency must request a hearing in writing within 10 business days of the notice.

The Indianapolis Housing Agency will notify the applicant/participant of the date, time and location of the discovery meeting. During the discovery meeting, the applicant/participant will be provided the opportunity to review the file and any documents or evidence in the possession of the Indianapolis Housing Agency that were used to make the determination. The family may request a copy of any document or evidence that will be used at the hearing during the discovery meeting. The Indianapolis Housing Agency reserves the right to charge \$0.25 per page for copies requested by the family.

If a family does not appear at a scheduled hearing and has not rescheduled the hearing in advance, the family must contact the Indianapolis Housing Agency within one (1) business day. The Indianapolis Housing Agency will reschedule the hearing only if the family can show good cause for the failure to appear.

A hearing officer appointed by the Indianapolis Housing Agency will conduct the Informal Hearing. Neither the person who made or approved the decision, nor a subordinate of that person shall be appointed as hearing officer.

A notice of the hearing findings shall be provided in writing within 30 calendar days. If the family misses an appointment or deadline ordered by the hearing officer, the action of the Indianapolis Housing Agency shall take effect and another hearing will not be granted.

The Indianapolis Housing Agency reserves the right to overturn the decision of the hearing officer in accordance with HUD requirements. When the Indianapolis Housing Agency chooses to exercise this right, a notice will be sent to the applicant/participant within 10 business days of the hearing officers decision.

The Indianapolis Housing Agency reserves the right to withdrawal the denial/termination of assistance notice at any time prior to or after the Informal Hearing.

All requests for hearing, supporting documentation and a copy of the final decision will be retained in the family's file.

**PAYMENT STANDARDS** (24 CFR 982.54 (d) (14))

*[The process for establishing and revising voucher payment standards]*

It is the policy of the Indianapolis Housing Agency to set its payment standards for all bedroom sizes at 100% of the published fair market rent. The Indianapolis Housing Agency payment standards will adjust automatically when HUD publishes new fair market rents.

**MINIMUM RENT** (24 CFR 5.623)

The Indianapolis Housing has established as policy a minimum rent of \$50, which applies to all voucher holders.

**RENT REASONABLENESS** (24 CFR 982.54 (d) (15))

*[The method of determining that rent to owner is a reasonable rent (initially and during the term of a HAP contract)]*

The Indianapolis Housing Agency will compare characteristics of the contract unit with characteristics of comparable unassisted units and will consider:

- Location, quality, size unit type, and age of the contract unit: and
- Amenities, housing services, maintenance and utilities to be provided by the owner in accordance with the lease.

In accordance with 24 CFR 982.512, the Indianapolis Housing Agency will also consider whether or not the contract unit is receiving other subsidies. These units may be subject to limits in addition to rent reasonableness. The Indianapolis Housing Agency will assess rent reasonableness by conducting either telephone calls, site visits after telephoning, or more extensive market surveys of available rental units. The Indianapolis Housing Agency will also consider the following:

- Market rent information obtained from the city, real estate agents, or banks;
- Rental information obtained from classified advertisements in newspapers; and
- The HUD Field Office Data Appraiser.

The Indianapolis Housing Agency will not accept documentation provided by a landlord or other party. Any information submitted by a landlord must be able to be verified to the Indianapolis Housing Agency's satisfaction. Independent documentation that cannot be verified to the Indianapolis Housing Agency's satisfaction should not be considered acceptable documentation. Where independent information is submitted the burden of proof is appropriately on the landlord.

The Indianapolis Housing Agency will not accept information that cannot be confirmed as true, accurate or genuine. A current lease, executed within the past six months is the best documentation a landlord can provide. With respect to verifying rental payments made by unsubsidized tenants-at-will (no lease) the Indianapolis Housing Agency may request that the landlord obtain a certified copy of his/her federal income tax return submitted for the previous year. Landlords are required to report rental income for federal income tax purposes on Schedule E of Form 1040. Up to three individual properties may be entered on Schedule E. For landlords who have multiple units and use accountants to prepare the Schedule E, a statement by their accountant may be considered sufficient documentation as to the rent paid on a particular unit.

To summarize, the Indianapolis Housing Agency is willing to receive additional documentation from landlords, but will exercise considerable judgement in determining if the documentation, as submitted, is acceptable. Documentation submitted for a unit, which is not "comparable" in the Indianapolis Housing Agency's judgment, will not be accepted. Even one, well-documented, verifiable "comparable" submitted by a landlord will not be considered if the Indianapolis Housing Agency is able to document that this one unit represents the exception, rather than the rule in that particular community or area.

**SPECIAL HOUSING TYPES** (24 CFR 982.54 (d) (16))

*[Special policies concerning special housing types in the program (e.g., use of shared housing)]*

**Homeownership Program**

The Indianapolis Housing Agency offers the Section 8 Homeownership and ROSS Public Housing Homeownership Supportive Services Options to eligible participants. The policies and procedures for these programs are contained in the Homeownership Addendum on page 31 of this Administrative Plan.

**Project Based Assistance Program**

The Indianapolis Housing Agency has designated up to 600 tenant-based vouchers for participation in the Section 8 Project-Based Assistance Program. The policies and procedures for this program are contained in the Project Based Assistance Program Addendum on page 46 of this Administrative Plan.

## **FAMILY AND OWNER DEBTS TO THE INDIANAPOLIS HOUSING AGENCY (24 CFR 982.54 (d) (17))**

*[Policies concerning payment by a family to the PHA of amounts the family owes the PHA]*

### **Family Debts**

The Indianapolis Housing Agency will make all reasonable attempts to collect all money owed by families. Methods to collect family debts include, but are not limited to:

- Request for lump sum payments; and/or
- Civil suits; and/or
- Payment/Repayment agreements; and/or
- Collection agencies; and/or
- Credit bureaus

Families who are unable to make a lump sum payment for an unsettled debt may chose to enter into a repayment agreement with the Indianapolis Housing Agency. The Indianapolis Housing Agency reserves the right not to enter into a repayment agreement if the family has an existing repayment agreement in place that has not been paid in full. The Indianapolis Housing Agency will not enter into a promissory note with a family when the note will exceed \$5,000.00. The maximum term of the promissory note is 12 months.

To remain in good standing, the family must abide by all terms and conditions of the repayment agreement. The Indianapolis Housing Agency may deny or terminate housing assistance for families who default on the agreement.

### **Owner Debts**

The Indianapolis Housing Agency will make all reasonable attempts to collect all money owed by owners. Methods to collect family debts include, but are not limited to:

- Request for lump sum payments; and/or
- Recapture from on-going Housing Assistance Payments (HAP); and/or
- Civil suits; and/or
- Payment/Repayment agreements; and/or
- Collection agencies; and/or
- Credit bureaus

Owners who are unable to make a lump sum payment or do not receive adequate HAP to satisfy an unsettled debt may chose to enter into a repayment agreement with the Indianapolis Housing Agency. The Indianapolis Housing Agency reserves the right not to enter into a repayment agreement if the owner has an existing repayment agreement in place that has not been paid in full. The Indianapolis Housing Agency will not enter into a promissory note with an owner when the note will exceed \$5,000.00. The maximum term of the promissory note is 12 months.

To remain in good standing, the owner must abide by all terms and conditions of the repayment agreement. The Indianapolis Housing Agency may deny or terminate housing assistance for owners who default on the agreement.

**INTERIM REEXAMINATIONS** (24 CFR 982.54 (d) (18))

*[Interim redeterminations of family income and composition]*

**Change to Family Composition**

Families are required to report all changes in family composition to the Indianapolis Housing Agency in writing within 10 business days of the change. An interim examination may be conducted, at the IHA's option, whenever there is a change in family composition.

**Changes to Family Income and Expense**

The family may request an interim examination whenever the family has a reduction in income and/or expense.

Families receiving an increase in income must report all increases in household income of \$50 per week or more, \$100 bi-weekly or more, \$200 per month or more and \$2400 per year or more. Changes must be reported in writing within 10 business days of the change. The Indianapolis Housing Agency will process all interim changes as a result of such increases.

**Effective Date of Changes to Family Income and Expense**

All changes that result in an increase in tenant rent will be made effective on the first day of the month, following:  
30-day notice of the change to the owner and family

➤ **RESTRICTIONS ON THE NUMBER OF MOVES** (24 CFR 982.54 (d) (19))

*[Restrictions, if any, on the number of moves by a participant family (see § 982.314(c))]*

It is the policy of the Indianapolis Housing Agency to restrict the number of moves a family is permitted to make. In general, families are not permitted to move more than once in a 12-month period, including moves inside or outside the Indianapolis Housing Agency.

The Section 8 Director may make exceptions to this policy on a case-by-case basis if there is an emergency reason for the move over which the participant has no control.

## **Portability Procedures** (24CFR 982.353 (c)(1), 982.355, PIH Notice 2004-12)

In the case of non-resident applicants, where neither the applicant nor the spouse of the applicant had a “domicile” (legal residence) in IHA’s jurisdiction when application was made, the following will apply:

- The family may lease a unit anywhere in the jurisdiction of IHA
- The family will not have the right to portability (during the initial 12 months following the issuance of the voucher)
- Exceptions may be made for families receiving vouchers due to HUD special admissions

### **Outgoing-**

- Request to Port submitted by family
- Determine if family is in good standing
- Determine if family is eligible to move and to be issued a voucher in accordance to Admin Plan, “Issuing and Denying Vouchers”
- Inform client of Port Procedures and limitations
  - ✓ Can not move to area with higher costs unless receiving agency will absorb
  - ✓ Must provide signed 30-day notice from current landlord
  - ✓ Must provide portability information sheet
  - ✓ Must provide forwarding address
  - ✓ Must attend briefing prior to transfer of paperwork
  - ✓ Must contact receiving agency within 10 days of transfer of paperwork
- Schedule family to attend a briefing
- Collect all required forms as stated above
- Family signs voucher
- Contact the receiving agency
  - ✓ Determine payment standards for their area
  - ✓ Determine any discrepancies in subsidy standards
  - ✓ Inform receiving agency that we will not pay if area costs are higher
  - ✓ Inform receiving agency of when paperwork will be sent
- Hud-52265 and all relevant paperwork and forms transferred to Receiving Agency (by fax and mail)
- Cancel current contract as indicated on 30-day notice
- If outgoing receiving agency must provide billing notification within 60 days of expiration of our voucher
- IHA must grant any extensions to the voucher term

### **Incoming**

- Upon receipt of Hud-52265, schedule briefing within 2 weeks (no exceptions)
- Issue Voucher and Request for Tenancy Approval  
Note: \*for applicants only-determine income eligibility prior to issuing voucher
- Any extensions must be granted by the Initial Agency
- Follow new move process
- Withdraw voucher if voucher expires and notify Initial Agency

### **Notification Deadlines**

- Notify Initial Agency within 10-days of contract execution of intent to bill or absorb, by sending Part 2 of Hud-52265
- If billing initial payment must be forwarded within 30 days of sending the Part 2 Hud-52265
- Initial Agency must receive bill by the 5<sup>th</sup> working day of each month
- Any changes in billing must be provided to Initial Agency within 10 working days of the effective date of change
- If denying family, family must be given the opportunity to grieve the denial
- If outgoing receiving agency must provide billing notification within 60 days of expiration of our voucher
- Notification of termination or absorption must be received and/or submitted within 10 days of action

**IHA shall have the right to modify any provision of the Portability Procedure not governed by statute or regulation for good cause or to comply with changes in HUD regulation or directives.**

**ADMINISTRATIVE FEE RESERVE** (24 CFR 982.54 (d) (21))

*[Approval by the Board of Commissioners or other authorized officials to charge the administrative fee reserve]*

The Indianapolis Housing Agencies Board of Commissioners must approve all expenditures from the administrative fee reserve.

## **HOUSING QUALITY STANDARDS** (24 CFR 982.54 (d) (22))

[Procedural guidelines and performance standards for conducting required HQS inspections]

The Indianapolis Housing Agency inspection requirements for housing quality standards utilize both HUD's Housing Quality Standards and Chapter 10 Minimum Standards for Residential Property and Housing from the Code of The Health and Hospital Corporation. The Health and Hospital Corporation is a municipal corporation authorized by the Indiana General Assembly to exercise legislative powers in addition to its executive agency powers. In other words, the Corporation, by its Board of Trustees, has the power to enact legislation. Further, the Corporation has the power to enforce the provisions of the legislation it enacts.

The IHA is required to conduct three types of inspections: initial, annual, and special inspections, including quality control inspections. Inspections result in pass, fail, or inconclusive reports. Pass inspections require no further action by the IHA. Fail or inconclusive inspections require follow-up reinspections or IHA verification to confirm the correction of the HQS infractions. Depending upon the nature of the item, responsibility for correction of fail or inconclusive items may be the responsibility of the owner or tenant. Failure to comply with correction notices results in owner or tenant sanctions, up to and including termination of the HAP.

Inspections may be performed by IHA staff or by a contractor designated by IHA.

The IHA shall schedule initial inspections in accordance with program requirements. Annual inspections, quality control inspections, and all resulting reinspections shall be scheduled to comply with SEMAP requirements. Other special inspections, such as complaint inspections, shall be scheduled as quickly as possible after receipt of request.

### ***Abatement of Payments***

The IHA *shall* abate HAP payments to owners who do not comply with notifications to correct HQS deficiencies within the specified time period: 24 hours or 30 days depending upon the nature of the deficiency. Placement of abatement shall occur by the first of the month following expiration of the notice. Except in the case of life threatening violations requiring corrections within 24 hours, the owner shall receive 30-day written notification of the abatement. The IHA shall use the *Notice of Housing Assistance Payment Abatement and Final Notice of Termination*, to notify the owner of abatement. Following a failure to comply with a notice of deficiency, owners are not entitled to HAP payments from the first of the month until the day the unit passes HQS.

### ***Termination of HAP Contract***

The IHA shall terminate the HAP contract for an owner's failure to comply with its terms and conditions, including non-compliance with HQS. Both the owner and the tenant shall be notified of intent to terminate. (Use *form - Notice of Housing Assistance Payment Abatement and Final Notice of Termination*).

The IHA shall issue a voucher to the family to move, provided the family is eligible (not in violation of the terms of assistance, including HQS responsibilities). The family shall be reminded of its responsibility to the owner to give notice of intent to move, and shall continue to pay its portion of the rent as long as the family remains in the unit.

### ***Special Inspections***

Special inspections include inspections in response to complaints. The IHA *shall* investigate complaints about HQS matters that are registered by tenants, owners or the general public. Violations resulting from complaint inspections are treated in the same manner as annual inspection violations. Failure to comply with violation notices issued from complaint inspections result in abatement of payment to owners and/or termination of program assistance for tenants.

Quality control inspections are a second type of special inspection and are required by program regulations. Special inspections resulting in a fail or inconclusive HQS determination require the same notification actions and enforcement processes described above for annual inspections.

### ***Housing Quality Standards Criteria***

The IHA inspection requirements for housing quality standards utilize both HUD's Housing Quality Standards and Chapter 10 Minimum Standards for Residential Property and Housing from the Code of The Health and Hospital Corporation. The Health and Hospital Corporation is a municipal corporation authorized by the Indiana General Assembly to exercise legislative powers in addition to its executive agency powers. In other words, the Corporation, by its Board of Trustees, has the power to enact legislation. Further, the Corporation has the power to enforce the provisions of the legislation it enacts.

Non-compliance with these standards is grounds for:

- Rejecting the unit at initial inspection
- Abating subsidy
- Terminating the HAP contract with the owner
- Termination of tenant participation in the program

Emergency Repair Items (24 CFR982.401 (a))

The following items are considered of an emergency nature and must be corrected by the owner or tenant (whoever is responsible) within 24 hours of notice by the inspector:

- Lack of security for the unit
- Waterlogged ceiling in imminent danger of falling
- Major plumbing leaks or flooding
- Natural gas leak or fumes
- Electrical problems which could result in shock or fire
- No heat
- Utilities not in service
- No running hot water
- Broken glass where someone could be injured
- Obstacle (s) which prevent tenant's entrance or exit
- Lack of functioning toilet

**SCREENING FOR BEHAVIOR AND SUITABILITY** (24 CFR 982.54 (d) (23))

*[PHA screening of applicants for family behavior or suitability for tenancy]*

The Indianapolis Housing Agency will not screen family behavior for suitability for tenancy. The Indianapolis Housing Agency will not be liable or responsible for the family's behavior or the family's conduct in tenancy. Screening for behavior and suitability is an owner responsibility.

## **HOMEOWNERSHIP ADDENDUM**

### **Section 8 Homeownership Option**

The Indianapolis Housing Agency (IHA) wishes to provide opportunities for individuals and families to become more economically empowered and secure through building family stability and wealth with homeownership options. Long viewed as one of the best ways for American families to create and pass on wealth, homeownership also offers many other valuable advantages. Recent studies have revealed, for example, that positive outcomes for children are dramatically increased through the stability of living in a family-owned home.

In offering the Section 8 Housing Choice Voucher Homeownership Option and ROSS Public Housing Homeownership Supportive Services Option, we seek to extend these and other benefits to participants to the individuals and families that we serve through the IHA Housing Choice Voucher Program.

The Indianapolis Housing Agency (IHA) will offer the homeownership option to all participants who meet the following eligibility requirements:

- The participant family is currently enrolled in the Family Self-Sufficiency (FSS) Program and in compliance with the FSS contract; or
- The participant family is a graduate of the IHA Family Self-Sufficiency (FSS) Program (or other Housing Authority's FSS Program, approved by IHA)

The Indianapolis Housing Agency will not offer the Section 8 Homeownership option to applicant families who are not currently participating in the Section 8 program.

The Indianapolis Housing Agency will offer vouchers to Public Housing families, who have satisfied the criteria of the ROSS Public Housing Homeownership Supportive Services Option as mandated by the grant (ROSS Homeownership and Supportive Services GMC Assignment Number HO-IN017-14043) approved by HUD. Vouchers may be issued as special admissions (see page 3, Special Funding), as requested and if available.

Additionally, under the ROSS Public Housing Homeownership Supportive Option applicant families must have completed an initial lease term and their first recertification in order to be eligible for the program. Applicants must have no more than (1) late rental payment in the last 12 months. Applicants must be eligible to receive a Housing Choice Voucher. Approved applicants may receive a Housing Choice Voucher by way of Special Admission (see Special Funding Page 3). (CFR982.203)

The Indianapolis Housing Agency will provide homeownership program opportunities up to 100 families at any given time.

**Initial Homeownership Program Eligibility Requirements** [24 CFR 982.627]

The family must meet all of the requirements listed below before the commencement of homeownership assistance.

The family must be eligible for the Housing Choice Voucher program.

The family must qualify as a first-time homeowner, or may be a co-operative member.

The family must meet the Federal minimum income requirement. The family must have a gross annual income equal to the Federal minimum wage multiplied by 2000 hours, based on the income of adult family members who will own the home. Unless the family is elderly or disabled, in which case the minimum income is equal to the amount of a monthly SSI payment for a single person without dependents, multiplied by 12. Unless the elderly or disabled, income from welfare assistance will not be counted toward this requirement.

The family must meet the Federal minimum employment requirement.

At least one adult family member who will own the home must be currently employed full time and must have been continuously employed for one year prior to homeownership assistance.

HUD regulations define “full time employment” as not less than an average of 30 hours per week.

A family member will be considered to have been continuously employed even if that family member has experienced a gap in employment, provided that the gap in employment:

Did not exceed 30 calendar days; and

The gap in employment did not occur within the 3 month period immediately prior to the family’s request to utilize the homeownership option; and

There has been no more than one (1) gap in employment within the past 12 calendar months.

The Federal minimum employment requirement does not apply to elderly or disabled families.

Any family member who has previously defaulted on a mortgage obtained through the homeownership option is barred from receiving future homeownership assistance.

The Indianapolis Housing Agency will impose the following additional initial requirements:

- The family may not owe money to the Indianapolis Housing Agency or any other Housing Authority.
- The family may not have committed any serious or repeated violations of a PHA-assisted lease within the past 12-month period.

**Homeownership Counseling Requirements** [24 CFR 982.630]

When the family has been determined eligible, they must attend and complete homeownership counseling sessions. Families will have the option of attending homeownership counseling, at their own expense, through approved not-for-profit organizations.

The following topics will be included in the homeownership counseling sessions:

- Responsible homeownership
- Home maintenance (including care of the grounds);
- Budgeting and money management;
- Credit counseling;
- How to negotiate the purchase price of a home;
- How to obtain homeownership financing and loan pre-approvals, including a description of types of financing that may be available, and the pros and cons of different types of financing;
- How to find a home, including information about homeownership opportunities, schools, and transportation in the PHA jurisdiction;
- Advantages of purchasing a home in an area that does not have a high concentration of low-income families and how to find homes in such areas;
- Information about Real Estate Settlement Procedures Act (RESPA), state and Federal truth-in-lending laws, and how to identify and avoid loans with oppressive terms and conditions;



**Eligible Units** [24 CFR 982.628]

The unit must meet all of the following requirements:

The unit must meet HUD's "Eligible Housing" requirements. The unit may not be any of the following:

A public housing or Indian housing unit;

A unit receiving Section 8 project-based assistance;

A nursing home, board and care home, or facility providing continual psychiatric, medical or nursing services;

A college or other school dormitory;

On the grounds of penal, reformatory, medical, mental, or similar public or private institutions.

The unit must be already existing or under construction at the time the family signs the contract of sale to purchase the home.

The unit is a one-unit property, duplex, town/row house or a single dwelling unit in a cooperative or condominium. A home in a planned use development, a loft or live/work unit, or a manufactured home to be situated on a privately owned lot or a leased pad in a mobile home park.

The unit has been inspected by the Indianapolis Housing Agency and by a qualified independent inspector designated by the family. The American Society of Home Inspectors (ASHI) or the National Association of Home Inspectors (NAHI) must certify the independent inspector to conduct home inspections.

The unit meets HUD's Housing Quality Standards and all requirements defined in this Administrative Plan.

The Indianapolis Housing Agency will not approve the seller of the unit if it has been informed that the seller is debarred, suspended, or subject to a limited denial of participation.

**PHA Search and Purchase Requirements** [24 CFR 982.629]

The Section 8 rental assistance will continue under the terms of the participant's rental agreement until a home is found to purchase. As required by HUD, the Indianapolis Housing Agency has established the maximum time that will be allowed for a family to locate and purchase a home. The family's deadline date for locating a home to purchase will be 180 calendar days from the date the family's eligibility for a home loan is approved. The family must purchase the home within 90 calendar days of locating a home to purchase.

These time limits do not apply to disabled or elderly participants.

**Inspection and Contract** [24 CFR 982.631]

The unit must meet Housing Quality Standards, and must also be inspected by an independent professional inspector selected and paid by the family.

The independent inspection must cover major building systems and components. The inspector must be qualified to identify physical defects and report on property conditions, including major building systems and components. These systems and components include, but are not limited to:

- Foundation and structure;
- Housing interior and exterior;
- Roofing;
- Plumbing, electrical and heating systems.

The independent inspector must not be an Indianapolis Housing Agency employee or contractor. The Indianapolis Housing Agency will not require the family to use an independent inspector selected by the Indianapolis Housing Agency. The Indianapolis Housing Agency requires that the inspector is a member of the American Society of Home Inspectors (ASHI) or National Association of Home Inspectors (NAHI) certified to conduct residential home inspections.

Copies of the independent inspection report will be provided to the family and the Indianapolis Housing Agency. Based on the information in this report, the family and the Indianapolis Housing Agency will determine whether any pre-purchase repairs are necessary.

The family must enter into a contract of sale with the seller of the unit. A copy of the contract must be given to the Indianapolis Housing Agency. The contract of sale must specify the price and terms of sale, and provide that the purchaser will arrange for a pre-purchase independent inspection of the home. The contract must also:

- Provide that the purchaser is not obligated to buy the unit unless the inspection is satisfactory;
- Provide that the purchaser is not obligated to pay for necessary repairs; and
- Contain the seller's certification that he or she has not been debarred, suspended or subject to a limited denial of participation.

**Financing** [24 CFR 982.632]

The family is responsible for securing financing. The Indianapolis Housing Agency has established financing requirements, listed below, and may disapprove proposed financing if it is determined that the debt is unaffordable.

The Indianapolis Housing Agency will prohibit the following forms of financing:

- Balloon Payment Mortgages
- Seller Financing
- Land Contracts
- Package Loans
- Wrap-Around Loans

**Continued Assistance** [24 CFR 982.633]

Homeownership assistance may only be paid while the family is residing in the home. The family or lender is not required to refund homeownership assistance for the month the family moves out.

The family must comply with the following obligations in order to continue to receive homeownership assistance:

The family must comply with the terms of the mortgage securing debt incurred to purchase the home, or any refinancing of such debt.

The family may not convey or transfer ownership of the home, except for purposes of financing, refinancing, or pending settlement of the estate of a deceased family member. Use and occupancy of the home are subject to CFR 982.551 (h) and (i).

The family must supply information to the Indianapolis Housing Agency or HUD as specified in CFR 982.551(b). The family must further supply any information required by the Indianapolis Housing Agency or HUD concerning mortgage financing or refinancing, sale or transfer of any interest in the home, or homeownership expenses.

The family must notify the Indianapolis Housing Agency before moving out of the home.

The family must notify the Indianapolis Housing Agency if the family defaults on the mortgage used to purchase the home.

No family member may have any ownership interest in any other residential property.

The family must attend and complete ongoing homeownership counseling.

Before commencement of homeownership assistance, the family must execute a statement in which the family agrees to comply with all family obligations under the homeownership option.



**Maximum Term of Homeownership Assistance** [24 CFR 982.634]

Except in the case of elderly or disabled families, the maximum term of homeownership assistance is:

15 years, if the initial mortgage term is 20 years or longer, or

10 years in all other cases.

The elderly exception only applies if the family qualified as elderly at the start of homeownership assistance. The disabled exception applies if, at any time during receipt of homeownership assistance, the family qualifies as disabled.

If the family ceases to qualify as elderly or disabled during the course of homeownership assistance, the maximum term becomes applicable from the date assistance commenced. However, such a family must be afforded at least 6 months of homeownership assistance after the maximum term becomes applicable.

**Homeownership Assistance Payments and Homeownership Expenses** [24 CFR 982.635]

The monthly homeownership assistance payment is the lower of the voucher payment standard minus the total tenant payment, or the monthly homeownership expenses minus the total tenant payment.

In determining the amount of the homeownership assistance payment, the Indianapolis Housing Agency will use the same payment standard schedule, payment standard amounts, and subsidy standards as those described in this plan for the Housing Choice Voucher Program. The only exception shall be that of unit size, which is established at time of home purchase, and will not alter during the time of homeownership assistance.

The Indianapolis Housing Agency will pay the homeownership assistance payment to the lender via electronic payment transfer.

Some homeownership expenses are allowances or standards determined by the Indianapolis Housing Agency in accordance with HUD regulations. These allowances are used in determining expenses for all homeownership families and are not based on the condition of the home.

Homeownership expenses include:

- Principal and interest on mortgage debt.

- Mortgage insurance premium (if required by lender or paid by homeowner).

- Taxes and insurance.

- The Indianapolis Housing Agency utility allowance used for the voucher program.

- The Indianapolis Housing Agency allowance for routine maintenance costs equal to \$50.00 per month.

- The Indianapolis Housing Agency allowance for major repairs and replacements equal to \$50.00 per month.

- Principal and interest on debt for improvements.

If the home is a cooperative or condominium, expenses also include operating expenses or maintenance fees assessed by the homeowner association.

**Portability** [24 CFR 982.636, 982.353(b) and (c), 982.552, 982.553]

Subject to the restrictions on portability included in HUD regulations and in Chapter 13 of this plan, the family may exercise portability if the receiving housing authority is administering a voucher homeownership program and accepting new homeownership families.

The receiving housing authority may absorb the family into its voucher program, or bill the Indianapolis Housing Agency. The receiving housing authority arranges for housing counseling and the receiving agency's homeownership policies apply.

**Moving With Continued Assistance** [24 CFR 982.637]

A family receiving homeownership assistance may move with continued tenant-based assistance. The family may move with voucher rental assistance or with voucher homeownership assistance. Continued tenant-based assistance for a new unit cannot begin so long as any family member holds title to the prior home.

The Indianapolis Housing Agency prohibits more than one move by the family during any one-year period.

The Indianapolis Housing Agency will deny permission to move with continued rental or homeownership assistance if it is determined that there is insufficient funding to provide continued assistance.

The Indianapolis Housing Agency will require the family to complete additional homeownership counseling prior to moving to a new unit with continued assistance under the homeownership option.

**Denial or Termination of Assistance** [24 CFR 982.638]

The Indianapolis Housing Agency will terminate homeownership assistance if the family is dispossessed from the home due to a judgment or order of foreclosure.

The Indianapolis Housing Agency will permit such a family to move with continued voucher rental assistance. However, rental assistance will be denied if the family defaulted on an FHA-insured mortgage, and the family fails to demonstrate that:

The family conveyed title to the home as required by HUD, and

The family moved within the period required by HUD.

The Indianapolis Housing Agency will terminate homeownership assistance if the family:

Transfers or conveys ownership of the home;

Fails to provide requested information to the Indianapolis Housing Agency or HUD;

Fails to notify the Indianapolis Housing Agency before moving out of the home;

Fails to use the assisted homeownership unit for residence by the family. The homeownership unit must be the family's only residence;

Leases or rents out the homeownership unit;

Commits any fraud, bribery or any other corrupt criminal act in connection with the program;

Engage in drug-related criminal activity, or violent criminal activity (I.A.W. 24 CFR §982.553);

An assisted family, or members of the family may not receive Section 8 tenant-based assistance (including homeownership assistance) for the same unit or for a different unit, under any duplicative (as determined by HUD or in accordance with HUD requirements) federal, state or local housing assistance program.

Failure to comply with the Family Obligations Under the Section 8 Program or IHA Home Ownership policies.

**IHA shall have the discretion to waive or modify any provision of the Homeownership Supportive Services Program or policies not governed by the statute of regulation for good cause or to comply with changes in HUD regulations or directives.**

## **PROJECT BASED ASSISTANCE ADDENDUM**

### Project Based Assistance

Project-based vouchers for existing units are component of the Indianapolis Housing Agency's Housing Choice Voucher Program. Initially, the Indianapolis Housing Agency will make 600 of its vouchers available for assistance to specific existing housing units if the owner agrees to set-aside a portion of the units in an existing development specifically for tenants who meet the income limits and other requirements of the Indianapolis Housing Agency's Housing Choice Voucher Program.

Families may apply directly at the approved Project Base sites for available units. Owners select families for occupancy of a particular unit after screening each family the family must then be referred to and approved by the IHA.. Each month, the Indianapolis Housing Agency pays the owner the difference between 30 percent of adjusted family income and the gross rent of the unit.

Under the project-based voucher program for existing units, the IHA enters into an assistance contract with the owner for specified units and for a specified term. The IHA and the owner execute an agreement to enter into housing assistance payments (HAP) contract for up to a ten-year term that is dependent on availability of funding under the IHA's ACC with HUD. The HAP contract establishes the initial rents and describes the responsibility of the PHA and the owner. Rents are set based upon market comparable units and may not exceed 110% of the published existing housing fair market rents. In addition, the HAP contract establishes the minimum housing quality standards that all units must meet before assistance can be paid on behalf of a family. These standards must be maintained throughout the term of the assisted tenancy.

The IHA will project-base vouchers for an existing property only if the contract is consistent with the IHA's goal of deconcentrating poverty and expanding housing and economic opportunity. The IHA requires all new contracts to the project-based voucher assistance program be for units in census tracts with poverty rate and minority concentration of less than 20 percent.

### Specific Participation Requirements

1. To be considered for participation, at a minimum, the applicant must meet threshold requirements. The IHA will evaluate and rate all applications for assistance that meet the threshold requirements and rating factors for award described in the Application for Section 8 Project-Based participation for existing housing. Threshold requirements for participation are:
  - Proven Ownership of proposed property.
  - Certification of previous compliance with Fair Housing and Civil Rights Laws; and
  - Certification that the applicant has not been deemed ineligible for participation in Federal and IHA programs.
  - Property must be located in a census tract with a poverty and minority concentration rate of less than 20 percent.

Applications that meet threshold criteria will be further rated based on proven management experience, property maintenance expertise, financial responsibility, and condition of property.

2. Investment of funds in property—The IHA will project-base voucher assistance without any requirement that the owner invest other funds in the property.
3. Income Mix—No more than 25 percent of the units in a building may receive project-based voucher assistance. Single-family dwellings are exempt from the 25 percent limit. A building with up to four units is considered a single-family dwelling.
4. Resident Choice and continued assistance—Families occupying units with project-based voucher assistance have the right to move after one year with tenant-based voucher assistance, a family that is referred to IHA

from the owners' site based must replace it. This will ensure that the specified number of subsidies continue to be used and the development throughout the term of the IHA's contract with the owner.

5. All selected applicants must sign a HAP Contract.
6. Contract Term and extension—The IHA has the discretion to set the initial contract term for any period of time up to a maximum of ten years, subject to the availability for adequate annual appropriations. The initial contract may be extended for the period that the IHA considers appropriate to achieve long-term affordability or to expand housing opportunities. At the IHA's option, the initial contract may bind the owner to accept extensions offered by IHA.
7. HQS and Inspections –Each unit identified to receive project-based assistance must pass an HQS inspection before a Hap contract can be signed, project based voucher contracts are subject to the same annual inspection requirements as regular vouchers, except that the IHA is permitted to develop a streamlined inspection system for the development rather than inspecting each unit each year.
8. Rent - The IHA's contract with the owner sets the rent for each unit with project-based assistance. The amount of the rent may not exceed the lower of the applicable minimum level, as explained below, or the "reasonable" rent in light of the rents charged for comparable unassisted units in the area. The applicable maximum is the maximum voucher payment standard which is 100 percent of the HUD-determined fair market rent (FMR). Up to this maximum, the rent for a unit is allowed as long as the rent is reasonable.
9. Rent Increases - Rent increases during the term of the contract may be approved by the IHA so long as the increased rents do not exceed the above rent limits and are reasonable. HUD's annual adjustment factor does not apply.
10. Family Share of the Rent – Families with project-based vouchers pay a flat 30 percent of their adjusted income for rent and utilities.
11. Wait List—The individual project base sites maintain their wait lists for project based voucher assistance. Owners are responsible for selection of tenants for units assisted with project-based vouchers from among the families on their wait list. No family is required to accept project-based assistance. Families that reject an offer of project-based assistance or are rejected by the owner and are on the tenant-based list retain their place on that list.
12. Targeting—Tenant-based voucher eligibility and targeting rules apply to project-based assistance for existing housing. This means that the income of families selected for project-based voucher units is considered in determine whether the IHA has complied with the requirement that at least 75 percent of the new admissions to the voucher program each year must have incomes at or below 30 percent of the area median income.
13. Vacancy Payments—As an incentive for owners to enter into project-based contracts, the IHA will offer vacancy payments to owners. Vacancy payments are limited to 60 days. However, the IHA and owners must seek to reduce the need for vacancy payments, and such payments will not be made if the vacancy is the fault of the owner (e.g. the unit does not pass reinspection or IHA refers at least three families to the owner, but the owner refused to select any of them). The IHA has discretion to reduce the number of units under a project-based voucher contract if no family accepts a unit within 120 calendar days of the owner's notice to the IHA of the vacancy. The IHA will then reissue the subsidy as a tenant-based voucher.
14. Location—The IHA will issue project-based vouchers for a property only if the contract is consistent with the goal of deconcentrating poverty and expanding housing and economic opportunities. The IHA requires that all new contracts to project-based voucher assistance must be for units in census tracts with poverty rate and minority concentration of less than 20 percent.

## Family Self Sufficiency Plan

### Overview

The Indianapolis Housing Agency (IHA) is committed to establishing and implementing a Family Self-Sufficiency (FSS) Program to help families who receive housing assistance achieve economic independence by utilizing an array of public and private resources. By coordinating housing assistance with needed services such as child care, education and job training/development, IHA assists both public housing and housing choice voucher participants to reach their goals of economic independence and self-sufficiency. The objective of the FSS program is to reduce the dependency of low-income families on welfare assistance and on the Housing Choice Voucher Program, Public or Indian Housing assistance or any Federal, State or local rent or homeownership subsidies. Under the FSS program, low-income families are provided opportunities for education, job training, counseling and other forms of social service assistance, while living in assisted housing, so that they may obtain the education, employment, business and social skills necessary to achieve self-sufficiency. Any resident or housing assisted participant with a sincere desire to achieve self-sufficiency is assisted to perform a self-assessment to identify personal motivating factors as well as the family's strengths and barriers relative to achieving self-sufficiency. IHA then assists participants to work their plans, providing emotional support during challenging times. At each step in the process, IHA helps participants to motivate themselves and to improve their self-esteem. Public/assisted housing is envisioned as serving two divergent populations. First, it provides a safety net for the elderly, handicapped and disabled whose biological, physical, or mental conditions will not permit entry or re-entry into the labor market. Second, public housing was, and still is, intended as a temporary resource for families who temporarily remain outside the workforce. IHA has targeted the female-head of family with small children at home; those faced with temporary dislocation from the labor market; those who are involuntarily without the means to provide housing for their families; and, those whose present incomes are inadequate to otherwise provide decent, safe, and sanitary housing in the existing housing market. The purpose of the Family Self-Sufficiency (FSS) Program is to promote the development of local strategies to coordinate the use of public housing assistance and housing assistance under the Housing Choice Voucher Program with public and private resources, to enable families to receive assistance under these programs to achieve economic independence and self-sufficiency. Under FSS, families are required to sign a Contract of Participation, which includes an Individual Training and Services Plan entered into between the housing agency and those members of the family who will be participating in the FSS program. The Contract of Participation is usually effective for a period of five years but can be extended for a period of two years for "good cause." A major benefit of participating in the FSS program is recognized when the family transitions to employment or has an increase in earned income. If the family is a housing choice voucher recipient, the increased income can be used to calculate and establish an escrow savings account. The funds saved can be used by the families for expenses such as homeownership or advanced educational opportunities. A key component of FSS is the establishment of the Program Coordinating Committee (PCC). The PCC is responsible for overall implementation of the program including assistance in developing the Family Self-Sufficiency Program Action Plan and securing commitments of public and private resources for the operation of the program.

The FSS program is administered at IHA by staff of the Department of Resident Relations, working in close collaboration with the Program Coordinating Committee representing key community institutions; many who will be providing services to FSS participants. A cornerstone of this program is the multi-disciplinary review and coordination of family strategies through the PCC and the leveraging of community resources such as social service programs, human resources and other financial resources from both the public and private sectors to support family goals. The basic objectives of IHA's Family Self-Sufficiency Program are as follows:

- Provide low-income families with basic life skills, educational advancement, academic and vocational counseling, job training/search activities, which leads to successful employment referral and placement.
- Assist families to make the transition from "welfare to work" by providing job training, support and employment search services.
- Decrease the length of time families stays in public/assisted housing.
- Provide adequate social and support services, as client needs dictate.

There are also certain basic programmatic assumptions that must be considered when implementing an FSS program.

Except for those who cannot be expected to work full-time due to circumstances beyond their control (i.e. age, health or physical ability), every family in public and subsidized housing will be made aware of FSS and encouraged to undertake the transition to the private housing market within a reasonable period of time after entering assisted housing.

Every family accepted in the FSS program accepts responsibility for seeking to achieve the objective of preparing themselves for the return to unsubsidized living arrangements.

In implementing the FSS program, the service provider's makes a commitment through a Memorandum of Agreement to assist the participating family in preparing themselves for the transition to unsubsidized housing. Such a commitment implies that sufficient jobs are, or will be, available to consistently employ people at wages adequate to support families at a standard of living above the maximum allowable for receiving assistance; and, Each family will demonstrate a uniquely different set of needs and concerns, which will demand unique strategies for addressing those needs.

- Local agencies administrating needs-based programs are able to determine how best to respond to the unique needs of the families within their jurisdiction and should be given flexibility in applying the rules and regulations in order to meet the unique needs of individual families.
- It is not unusual for former public assistance recipients to fail in their first attempts to secure employment, which means the FSS program must provide intensive focus on both job retention issues and facilitating multiple placements (career pathways) for residents until the job "fit" is right.

#### Program Management

The Family Self-Sufficiency Program is managed by IHA's Office of Resident Relations (ORR). This office coordinates the day-to-day activities of the program and the Director of ORR reports directly to the Executive Director of the Indianapolis Housing Agency. The overall mission of this office is to provide support and address the job readiness, job training and placement and human service needs of public housing residents and Housing Choice Voucher program participants. Through these expanded efforts, IHA aims to improve the economic self-sufficiency of working adults, promote the academic achievement and career development of youths and maximize the extent to which seniors can live healthy and independent lives.

To support the Agency's Family Self-Sufficiency efforts, IHA staffs the program with seven full-time staff, a Program Coordinator, four FSS Case Managers, one Recruiter and a HOPE VI Representative. The FSS Case Managers are responsible for identifying and assessing family skills and needs by utilizing interviews, written assessment tools and home visits. They utilize the Individual Training and Services Plans, an integral part of the Contract of Participation. They provide ongoing monitoring and support to families in meeting their goals and advocate for services as needed. They also work with other IHA staff to insure FSS families are in compliance with their housing assistance.

Although the Office of Resident Relations (ORR) assumes responsibility for organizing the Family Self-Sufficiency Program, the Program Coordinating Committee (PCC) links housing, job training and apprenticeships, family and individual counseling, drug and alcohol treatment and counseling and career development with subsidies for food stamps, Medicaid, child care and other transfer payments in a more consistent and coordinated manner. In addition, the PCC coordinates services in conjunction with the changing federal "Welfare to Work" legislation.

The PCC, along with ORR and Family Self-Sufficiency staff, make recommendations concerning policy and regulatory adjustments in the administration of the program. The Committee is involved with the implementation in the following manner:

- Assistance in securing educational advancement, supportive services and employment opportunities in the public and private sectors.
- Providing linkages with regard to home ownership for the participants.

In addition, one of the major functions of the PCC is to determine what resources are needed and available in the community that can be mobilized to service FSS participants. As new providers are recruited by the Housing Agency and the PCC, additional families may be served.

The Family Investment Center (FIC), located at the Laurelwood Family Housing Development, is one of the focal point of IHA's Family Self-Sufficiency Program. The primary objectives of the Family Investment Center are to provide the support and resources needed by public housing and housing choice voucher families to successfully complete all aspects of their FSS Action Plan (s), to obtain jobs and move to economic self-sufficiency. IHA has assembled a service team of local service providers who have located staff and program resources at the FIC. In addition, linkages have and will continue to be established with many other local initiatives, which share similar goals.

The Indianapolis Housing Agency enjoys cooperative relationships with a variety of agencies and has been able to enlist commitments from a number of the major providers of services to low-income families as well as those currently on public assistance. Support from such service providers is essential if IHA is to assist FSS families meet their goals.

### Family Demographics

The Indianapolis Housing Agency's Family Self-Sufficiency Program is designed to increase the availability for those most in need of subsidized housing by assisting families already receiving housing assistance in making the transition back into the private housing market. FSS seeks to accomplish this by providing the opportunity for low-income families to achieve their goals of economic and social independence through employment and home ownership or some other non-subsidized living arrangement. To accomplish these objectives, the families' eligible for consideration for FSS must live in either public or subsidized housing. The head of household in the target universe for IHA's Family Self-Sufficiency Program will be 90% female and 10% male. The following breakdown of IHA's target population is by race and ethnicity.

### Analysis of Required Supportive Services

To identify the ever changing needs of IHA's potential FSS families, the Indianapolis Housing Agency periodically sends survey letters to all Housing Choice Voucher participants and conducts needs assessment with public housing residents in each of the agency's housing developments. Housing Choice Voucher families are asked to answer questions soliciting information about why they are interested in the program and what supportive services they feel are needed.

### Estimate of Participating Families

IHA provides supportive services to 577 families, with an initial breakdown of 497 Housing Choice Voucher participants, and 80 public housing families. This figure is based upon available resources including Housing Choice Voucher Administrative fees, ROSS grant, EDSS grant, HOPEVI program, federal operating reserves as well as the scope of supportive services needed to assist potential FSS families that have already been secured.

Based upon the results of survey letters sent to all eligible Housing Choice Voucher families and the needs assessments conducted with public housing residents, IHA will continue to expand its base of services and agency involvement to service additional families who have other identified needs.

### PROGRAM SIZE

Because of staff reductions our mandatory program size of 831 has been reduced. IHA will continue to review and work toward the Quality Housing and Work Responsibility Act of 1998 Relative to future program size and any modifications will be approved by the Board of Commissioners and sent to HUD for approval.

### ELIGIBLE FAMILIES FROM OTHER SELF-SUFFICIENCY PROGRAMS

FSS recruitment efforts will be directed towards Housing Choice Voucher residents, Public Housing Residents, FIC participants and HOPE VI participants.

### FSS Family Selection Procedures

### PROGRAM REQUIREMENTS

FSS is a voluntary program for Housing Choice Voucher and Public Housing residents. FSS is aggressive in their recruitment efforts, such as, attending Housing Choice Voucher briefings and having participants sign a pre-application with follow-up at the time the Request for Lease Approval is returned and signature on the Contract of Participation at time of lease up. Public Housing residents and FIC participants sign a Contract of Agreement when the resident makes contact with FSS. HOPE VI participants sign a Contract of Agreement upon lease up.

- Participants must complete an Individual Training and Services Plan (ITSP) and agree to fulfill all requirements of the family needs assessment in any areas identified.
- It is beneficial for the head of household to have an eighth grade reading level and be ready to complete high school, Technical Course or GED requirements.
- Participants should agree to sign authorizations for release of children's school records and agree to services in any areas identified.
- All family members over 18 should be willing to participate in educational and employment assessments.
- Participants shall demonstrate commitment by keeping all scheduled appointments, such as the 90-day case reassessment.
- Head of household must be a tenant in good standing according to the terms of their housing program regulations and/or lease.
- Adult public housing residents must participate for at least 8 hours per month in community service or economic self-sufficiency program.

### Application Process

Families in the FSS Program are asked to complete an FSS Application Form, which indicates their interest in providing household information necessary to initiate consideration. This form also acts as a release of information document so that staff may initiate discussions with other needs-based programs regarding benefits the family may be receiving or be eligible for under the new program. The FSS Application also permits FSS staff to review the family's tenant folder in order to complete the Contract of Participation. An FSS Case Manager is assigned to the applicant at this time.

Once a family has submitted the Application, staff reviews all available information concerning family composition, income, service needs and other relevant factors. The case manager, in conjunction with the family, begins to complete the Individual Training and Services Plan and the family specific Contract of Participation. At this stage, the adult members may also participate in educational testing and job skills identification exercises to assess the employability level of the designated head of household, individual service needs of each family member and what services and agencies, if any, will be needed by the family. This second interview may take place in the applicant's home.

The completion of the Contract of Participation and Individual Training and Services Plan are finalized with the approval of the Program Coordinator. Upon approval, the case manager and FSS participant discuss the final goals and the Contract is signed.

If all available slots are filled before the list of families interested is exhausted, those remaining will be placed on a wait list and will be offered a slot if a participating family leaves the program or, if IHA determines it has the capacity to increase program size. Family selection from the wait list shall be accomplished (1) through the use of a lottery system; (2) based upon the length of time the family has resided in public housing; or, (3) date the family expressed an interest in the FSS program.

IHA believes that motivation of families is key to ensuring the participant family is interested in the FSS program. A family must attend an FSS orientation or briefing as well as pre-selection interviews and submit to a home visit. By requiring the family to complete certain tasks, such as the FSS application and family assessment, IHA is providing an opportunity to measure the family's willingness to undertake the obligations, which will be required under the Contract of Participation. *It is important to note that the families based upon their educational level and disabilities, if applicable must accomplish all motivational tasks given to FSS families.* As an example, a requirement that a participant write a paragraph indicating willingness to join the program should not become an obstacle if the individual does not have the ability to complete this task. Instead, the participant should be given the opportunity to tell you orally why he/she is interested in the FSS program. *Reasonable accommodations must be made for individuals with mobility, manual, sensory, speech impairments, mental or developmental disabilities.* Prohibited motivational screening factors include the family's educational level, educational or standardized motivational test results, previous job history or job performance, credit rating, marital status, number of children, or other factors such as sensory or manual skills, and any factors which may result in discriminatory practices or treatment toward individuals with disabilities or minority or non-minority groups.

*In all cases, IHA will be cognizant to ensure FSS selection is accomplished without regard to race, color, religion, sex, handicap, familial status or national origin.*

#### Incentives to Encourage Participation

- Developing a comprehensive incentive plan is key to selling the benefits of FSS to housing assisted families during recruitment efforts. As a result, IHA has integrated the following incentives:
- Assignment of a FSS Case manager that will oversee the family's progress towards successfully completing the program. *Intensive case management is the single most important element of a successful self-sufficiency program.*
- Establishment of participant escrow accounts so that families can save money for homeownership, further education or other specified purposes. Funds from the escrow account are normally disbursed to the family upon completion of the Contract of Participation.
- Priority placement in other IHA funded supportive service programs such as those provided by the Family Investment Center.
- Access to a wide range of supportive services such as the computer lab, adult education and training, jobs database and family health programs.
- Customized needs assessments and skills aptitude assessments so that family members can develop realistic, attainable employment goals.
- Intensive support and counseling in job readiness, search and initial employment phases. Ongoing activities include resume development, interviewing skills, time management and other skills identified as necessary for the individual participant to secure employment.
- Priority in WIA funded programs.
- Monthly public relations/media stories shall be used to give the program a positive identity for participants.
- Other incentives will continue to be identified and added to IHA's Family Self-Sufficiency Program.

#### Outreach Efforts

Program outreach and recruitment is an ongoing component on FSS and is conducted in the following manner. All eligible families living in public or assisted housing are informed of the FSS program through media campaigns, information presented at Resident Organization meetings, newsletters, direct mailings and homeownership enrollments. *Every attempt will be made to insure that all families, regardless of race, color, religion, sex, handicap, familial status or national origin, within the targeted universe are aware of the program and have the opportunity to participate.* After exhausting the list of existing Housing Choice Voucher participants and public housing residents, IHA intends to notify applicants on the wait lists that are near receiving their housing subsidy.

FSS staff, in conjunction with the Office of Resident Relations, conducts FSS informational meetings on a regular basis to current, future and prospective Public housing residents and Housing Choice Voucher participants as well as attending Housing Choice Voucher briefing sessions for new program participants. Residents are also able to schedule individual meetings with FSS staff to answer family specific questions. During the informational meetings, potential applicants are informed of program incentives and requirements. Staff try to interest and motivate residents

about FSS by emphasizing the connection between recent changes in federal and state welfare rules and the potential benefits of FSS participation including escrow savings and individual family support services.

The informational meetings give families an insight into the program and applications are available for potential applicants at the meetings. *FSS staff also encourage families to participate in educational, job training and employment opportunities being offered regardless of their status in the FSS program.*

One of the most successful methods of FSS recruitment into the self-sufficiency program occurs through peer networking/counseling. As families begin to reap the benefits of FSS, they share their experiences with other residents, which increases the credibility of the program. In other words, *a successful FSS program also sells itself.*

#### FSS Activities and Supportive Services

### PROGRAM STRUCTURE

It is the expressed purpose of the Family Self-Sufficiency Program to assist low-income families achieve the American dream of true upward mobility. The application, needs assessment and selection steps previously detailed are designed to ensure that each FSS participant has a solid, achievable plan for economic self-sufficiency backed by appropriate supportive services. The FSS Program seeks to accomplish this through two different levels of assistance to each family who participates in the program. The first of those levels (Remediation Stage), seeks to address barriers to successful achievement resulting from educational and/training deficiencies. The second level (Transitional Stage), seeks to build upon the first level by providing opportunities for financial and investment counseling, homeownership and budgeting seminars, minor repair and maintenance training and other experiences which enhance their probability of success once they have made the transition. It should be noted the Welfare Reform legislation, which established timelines for Temporary Assistance for Needy Families (TANF) to receiving TANF benefits.

#### A. Remediation Stage

The first phase of FSS is characterized as the Remediation Stage during which time an Individual Training and Service Plan (ITSP) is established for each adult member of the household. This phase may last up to two years (this stage may be extended provided IHA finds good cause exists for granting such extension). This extension ensures that each participant is ready to move on to the Transitional Stage. No participant should fail due to lack of time allowed in the early stages of their educational/training plan. During this extension, all members of the household work towards completing the Individual Training and Service Plan. These commitments, plus those of the Indianapolis Housing Agency to the family, will be finalized as part of the ITSP between the family and the Authority. The provisions of the Individual Training and Services Plan are as follows:

- Commitments by IHA to make available the resources and services described in the Individual Training and Services Plan.
- Agreement by the family to participate in the programs and activities prescribed by the ITSP.
- A statement indicating the participant's rights to request an extension of the Remediation Stage provided that IHA finds that good cause exists for granting the extension.
- A termination statement indicating that failure to complete the commitments in the ITSP will cause the family to be terminated from the FSS program at the end of the Remediation Stage.

In order to assist the family in identifying and overcoming the barriers to re-entry into labor and private housing markets, diagnostic and employability analyses is undertaken during the waiting period and prior to formal participation in the program. The Individual Training and Services Plan is developed by the program staff, in conjunction with the head of household, prior to formal program participation. This plan serves as a contract between the program and the family regarding each party's responsibilities and understandings regarding the implementation of the plan and is attached as an Exhibit to the Contract of Participation at the start of the program. The Individual Training and Services Plan may be modified at any time by written agreement of all parties.

During the Remediation Stage, program staff, in conjunction with staff from other needs-based or state and federally funded programs (IPIC, Workforce Development, Goodwill), work with the family to implement the plan. Activities to assist the family might include:

- Remedial education and literacy classes
- High school completion or equivalency
- Job training and preparation
- Pre-employment/personality development
- Health/dental
- Child care
- Transportation
- Life management skills
- Substance abuse treatment and counseling
- Family services
- Homemaking skills and parenting
- Money management
- Investment counseling

The Remediation Stage is included to provide an opportunity for families to receive the kinds of services, education and training which will move them from a marginal employment situation to one in which there is an opportunity for career advancement. Some families have genuine ambition but have been kept from obtaining an education or job training experience due to circumstances beyond their control. Some families may need minimal assistance and will be ready to enter the Transitional Stage within only a brief time after entry into the program and placement in the Remediation Stage.

#### B. Transitional Stage

At the end of the Remediation Stage, the family undergoes a reassessment and counseling to determine the probabilities of successful completion of the Transitional Stage. The family then signs a Contract Addendum spelling out the conditions under this next phase, including:

- A five year limitation on participation in the program, unless an extension has been granted from IHA, and their residency in assisted housing;
- A description of the manner in which rental payments will be calculated and the accumulations under an escrow savings account, as well as a description of the escrow savings account and the participant's access to such account at the end of the program consistent with 24 CFR 984.305 (please note, it is possible for families in the Remediation Stage to be employed and earning escrow savings as well);
- The participant's and IHA's obligations during the Transitional Stage; and,
- The conditions under which a family or person (Housing Choice Voucher and public housing), may terminate or be terminated from the FSS program.

The contract with the family ends if the family has completed their obligations under the Contract of Participation, including the requirement of each Individual Training and Services Plan and the condition that the head of each FSS family has obtained and maintained suitable employment and, for each participating FSS family that is a recipient of welfare assistance, a certification that they have been independent from such assistance at least one year before the expiration date of the term of the contract.

The Transitional Stage is designed to permit the family time to accumulate sufficient savings so that it will be able to either make a substantial down payment on a home or, otherwise, prepare for long term housing in the private rental market. During this stage, the program staff continues to provide counseling and supportive services to insure participant success once they leave the program. This stage covers a period not to exceed five (5) years (unless an extension is granted under the terms explained under the Contract of Participation), during which time the following will occur:

1. The head of household and/or adult family members will be expected to be engaged in full-time employment over the life of the contract. If unemployed at any time during the terms of the FSS

- Contract, the head of household should be expected to meet with IHA's Economic Development Coordinator.
2. Counseling and assistance in home ownership, money management, work habits, employee-employer relations, and other areas of problem solving will be provided families at monthly workshops or through individual counseling sessions, if necessary. Assistance will include further job training in more technical areas to improve employability and longevity on the job through training programs.
  3. FSS Housing Choice Voucher families pay rent to the owners in accordance with the normal procedures and IHA's housing assistance funds, paid by HUD, will be utilized for the FSS escrow deposit.
    - a. During the term of the FSS Contract of Participation, IHA calculates the escrow amount for each family using HUD's escrow credit worksheet. The amount of the escrow varies depending upon the income of the family and is only initiated when earned income increases after execution of the Contract of Participation.
    - b. "Escrow savings account" credits reflect the difference between earned income at the beginning of the Contract of Participation and any increase in earned income after this date. Assume that as of the effective date of the Contract, the total tenant payment is \$500, the contract rent to the owner is \$500, and the IHA housing assistance payment is \$450. One year later, the total tenant payment is \$150 (increase attributable to higher earned income), and the contract rent remains at \$500. In this case, the family pays the owner the \$150, IHA's housing assistance payment is still \$450, however, \$350 to the landlord and the monthly credit to the FSS escrow account is \$100.
  4. **If a family member becomes temporarily disabled or ill which results in a loss of income during the Transitional Stage, or if a family member loses his or her job as a result of general layoffs or plant closings or other reasons beyond the control of the individual, the Contract of Participation may be extended up to two years to reflect these circumstances beyond the family's control. However, if the disability is permanent, the family may be transferred back into a conventional housing program.**
  5. If a Housing Choice Voucher family decides that it does not wish to honor the terms of the Contract of Participation and drops out of the FSS program for reasons other than disability or if the family is terminated from the program for good cause as specified in the Contract, the escrow account will not be refunded and will be used to defray the costs of the program. In the case of a public housing resident, the amount of escrow will be returned to IHA as rent payment.
  6. Participating FSS families may request an Informal Hearing be held by IHA to consider whether the Housing Agency's decision to terminate supportive services and/or Section 8/public housing assistance as spelled out in the Contract of Participation is in accordance with the law, HUD regulations and any IHA administrative policies specified in the approved Housing Choice Voucher Program Administrative Plan. The hearing will be conducted by any person designated by IHA's Executive Director, other than the person, or a subordinate of such person, who made or approved the termination decision.
  7. It is anticipated that the PCC, in conjunction with local financial institutions and the Indianapolis Housing Agency, will advocate with local government the availability of low-interest loans for persons to purchase homes in the private market, and will also advocate for the provisions incentives to ensure the availability of moderately priced housing in the private market.

#### Activities and Supportive Services

*As previously stated, IHA will coordinate FSS with their Family Investment Center (FIC) facility, located at the Laurelwood Housing Community. Public housing residents as well as IHA's Housing Choice Voucher program participants, will be encouraged to utilize the Center where they are able to obtain comprehensive "one stop" services related to job readiness, job training, job placement and general family development services including the Computer Learning Center's program activities. Families who come into the FIC will work with a Family Self-Sufficiency Case Manager to develop a family needs assessment; designed to address family development needs, promote economic self-sufficiency and link residents to existing job training and placement opportunities. All IHA families will be encouraged to utilize the Center and join the FSS program and sign a Contract of Participation. It is preferable that FSS Case Managers handle a maximum caseload of 40-50 families. Using a combination of funding sources including Housing Choice Voucher Administrative fees, operating reserves and federal grants such as*

*PHDEP, Family Investment Center Program and HOPE VI families will receive intensive FSS support each year from IHA.*

To complement FSS services provided by Indianapolis Housing Agency staff, IHA relies on a number of cooperative relationships with a variety of agencies experienced with providing services to low-income families. Support from such private and public agencies is essential if IHA is to assist FSS families reach their goals. The FSS program has solicited support from federal, state and local governmental agencies and human service organizations in the greater Indianapolis area. The following is a sample of programs available to FSS families:

**Community Outreach:** Community organizing, resident orientation, technical assistance and organizational support to resident councils.

**Family Support Services/Economic Development Programs:** Family support programs, counseling, adult education, employment and training programs, Adult Basic Education (ABE), childcare, transportation, employment opportunities and homeownership activities.

**Youth Development:** Child care, on-site educational and recreational programs, teen peer leadership focusing on health issues, after-school health programs, adolescent health education programs, parenting classes, teen pregnancy prevention programs, adolescent violence prevention, youth job training and education, group and individual therapy, summer youth employment opportunities.

**Drug Prevention, Education and Treatment:** Community organizing, outreach and counseling programs, off-site intervention and treatment programs, substance abuse prevention training and family support services.

Recognizing the critical importance of computer literacy, the FIC facility includes a computer center, which has up-to-date personal computers and printers and a range of training software.

Major commitments for support have been received from Goodwill, INHP, and Workforce Development. These are the primary regional employment and training oversight agencies for the greater Indianapolis area administering WIA funds and a wide range of employment, training and job readiness initiatives including an extensive effort to support public assistance recipients move off welfare and into well-paying jobs. Workforce Development recognizes that IHA residents are a primary target population for welfare-to-work programs and intends to actively coordinate its planning efforts so that IHA's resident population needs and issues are carefully considered. Therefore, INET and IHA are focusing on TANF recipients in public housing and Housing Choice Voucher families.

Services to be provided by Service Providers are:

I. Workforce Development

Provides training and employment

II. INHP

Provides assessment, homeownership training and qualification for a mortgage loan

III. Goodwill

Provides case management, assessment, pre-employment instruction (1st Step), vocational skills training, ABE/GED preparation, job seeking instruction, placement assistance, and retention services. Placement with WIA programs.

IV. Habitat for Humanity

Provide new and renovated houses.

V. Training Inc.

Office skills training and life skills education

VI. Family Loan Program

Auto loans, auto repair loans, & 1st month rent and security deposit loans

VII. Westside Community Ministries Inc.

Provide computer training, adult education, survival skills for women, assist with temporary housing, day care, after school enrichment programs.

Method for Identification of Family Support Needs

There are several methods that are used to assist FSS staff identify the social service needs of the participants as well as deliver those services and activities to the families. First, the Housing Agency sends survey letters to all Housing Choice Voucher participants and conducts needs assessments in all public housing communities. The Housing Choice Voucher families are asked to answer soliciting information about why they are interested in the program and what supportive services they feel are needed. Based upon the results of the survey letter and the needs assessment, IHA expands its base of services and agency involvement. As previously discussed under *Outreach Efforts*, IHA also actively recruits for the program through a media campaign, information presented at Resident Organization meetings, newsletters and direct mailings. Additional information will be gathered during the completion of the FSS Application Form as well as during the testing that occurs when staff and potential FSS families complete assessment tools that are used to determine family goals as well as barriers to achieving self-sufficiency. Identification of initial family needs are identified in the Individual Training and Service Plan, which is incorporated in the Contract of Participation. Finally, FSS staff and the Program Coordinating Committee continue to gain an understanding of family needs as the program grows and they see first hand how each family has specific issues that must be addressed.

The delivery of services by IHA determines the success of the self-sufficiency program efforts. To accomplish this, IHA established an Office of Resident Relations that reports to the Executive Director of the Housing Agency. The agency's self-sufficiency program is administered by the FSS Program Coordinator, four (4) FSS Case Managers, one Recruiter, HOPE VI Representative, and an Economic Development Coordinator. It is the responsibility of the above staff to insure that services, which are committed by IHA, are available and delivered. Staff is responsible for identifying and assessing family skills and needs, utilizing interviews and written assessment tools. They develop the Individual Training and Services Plan (ITSP) and the Contract of Participation. Outside agencies such as Goodwill, INET and INHP may also provide assessment, development of the ITSP and case management services. The Case Managers maintain regular contact with their FSS families, which help build trust between the participants and the Housing Agency.

The FSS Program Coordinator executes the contract after receiving the assessment and ITSP from the family's caseworker. The Coordinator provides periodic monitoring and tracking of each FSS family. FSS staff provides ongoing monitoring and support to families in meeting their goals and advocate for services as needed. In addition, a 30-day initial case review up to 120 days case review system has been established to insure families are on track and meeting their obligations. FSS Case Managers maintain a working relationship with the service providers and take appropriate action if service delivery is not appropriate. They update and revise the service provider network if they are not meeting the needs of the FSS families. IHA utilizes both internal, including FSS participants and external resources to monitor program effectiveness.

Office of Resident Relations (ORR) has the responsibility for administering the Family Self-Sufficiency Program, the Program Coordinating Committee provides technical support of the program and the network of providers that has been assembled. The Program Coordinating Committee (PCC) links the services in a coordinated manner in conjunction with the changing federal and State "Welfare to Work" legislation.

#### Program Termination; Withholding of Services; and Available Grievance Procedures

The Contract of Participation may be terminated before the expiration of the term by any of the following:

- Housing Choice Voucher assistance is terminated.
- When IHA determines that the head of household or other participating family member has failed to fulfill the terms of the Contract of Participation, including compliance with the public housing lease or the Housing Choice Voucher lease, and any extension thereof.
- Failure of a Housing Choice Voucher family to comply with the contract requirements because the family has moved outside the jurisdiction of IHA.
- Withdrawal of the family from the FSS program.
- Mutual consent of both parties.
- By such other act as is deemed inconsistent with the purpose of the FSS program.
- By operation of law.

The FSS Contract of Participation provides that the family must comply with the assisted lease. Therefore, noncompliance with the Public Housing dwelling lease is grounds for termination. In the Housing Choice Voucher program serious and repeated violations of the lease are grounds for termination of assistance in the certification and voucher programs. Therefore, serious and repeated violations of the lease would be grounds for termination of the FSS contract as well as termination of housing assistance.

The Family Self-Sufficiency Program is geared to insuring that each participant realize their goals of economic independence and self-sufficiency and every effort will be made by the staff and Program Coordinating Committee to in power participants to reach self-sufficiency. As a result, the PCC has established the policy that ***“the option of withholding supportive services for contract violations will not be considered”*** since this may in fact compound family issues and further prevent the family from complying with their program requirements. If, however, the tenant continues on-compliant behavior, the staff may recommend termination from the program.

The decision to terminate a Housing Choice Voucher family from their housing assistance will be made by the Housing Choice Voucher Director in accordance with that program’s regulations. It is important to note that the Housing Choice Voucher Program is not required to terminate Housing Choice Voucher assistance as a result of removal from the FSS program. IHA may also temporarily suspend participation in the program to allow the family time to become compliant.

If IHA staff decide to terminate a families participation in the FSS program or Housing Choice Voucher assistance because the family has failed to comply with it’s FSS Contract of Participation, the Housing Agency will offer the family an Informal Hearing. The Informal Hearing allows the family the opportunity to consider whether the decision to terminate was done in compliance with FSS program rules as well as in accordance with any appropriate laws, HUD regulations or IHA’s approved or Housing Choice Voucher Administrative Plan. The Hearing will be conducted by any person or persons designated by IHA, other than a person who made or approved the termination decision or subordinate of such person.

#### Non-participating Families

Families in targeted Public Housing programs, such as: Hope VI can be terminated if they refuse to participate in the FSS program. The Housing Choice Voucher Program can terminate housing assistance to families with a signed CoP for not working on their goals.

#### Timetable for Program Implementation

IHA’s Family Self-Sufficiency Program began within 12 months of HUD’s initial approval of the FY’ 93FSS Incentive Award for Housing Choice Voucher units. Within this time frame, IHA hired an FSS Coordinator, who began outreach, participant selection and enrollment activities.

Indianapolis Housing Agency has completed enrollment of the total number of families required to be served under the FSS minimum program size of 1,082 and began delivery of supportive services within two years from the date of notification of approval of the application for new public units for a public housing FSS program or for new rental vouchers under the Housing Choice Voucher Program.

#### Certification of Coordination

The Family Self-Sufficiency Program operates under the direction of the Indianapolis Housing Agency’s Office of Resident Relations, which helps to insure close coordination and effective utilization of services.

The Indianapolis Housing Agency certifies that the development of the services and activities under the Family Self-Sufficiency Program has been coordinated with the Job Opportunities and Basic Skills (JOBS) Training Program under Part F of Title IV of the Social Security Act; the programs provided under the Job Training Partnership Act (JTPA); Workforce Investment Act (WIA) and any other relevant employment, child care, transportation, training and education programs in the greater Indianapolis area. IHA further certifies that implementation will continue to be coordinated in order to avoid duplication of services and activities.

## Record Keeping and Program Evaluation

The key to determining whether the concepts and philosophies underlying the Family Self-Sufficiency Program outlined in this Action Plan are accurate and the program effective is found in the design of the project and the record keeping which will take place. The Indianapolis Housing Agency's intent is to insure that adequate baseline and process information will be available through which the program can be monitored and evaluated by the Family Self-Sufficiency Coordinator and others as approved by the Executive Director.