

**Public Housing Responses to Legal Services of Northern CA  
Suggestions to 2022 PHA Plan Significant Changes**

<b>LSNC QUESTIONS/SUGGESTIONS CHAPTER AND ITEM</b>	<b>PHA RESPONSE</b>
<p><b>ANNUAL PLAN:</b> They would like to chat about the RAD and other PH conversions anticipated in 2022 and particularly hear about resident notification and participation. Sarah, concern is early panic from residents before each move occurs. Are we doing any conversions that are NOT RAD related?</p>	<p>Cecette Hawkins provided answers to all your questions during the call on 8/19/2021.</p>
<p><b>Chapter 6</b> <b>6-1:</b> Reducing minimum rent down to \$ 0.00.</p>	<p>Agreed and will be effective with the next annual re-certifications.</p>
<p><b>6-16:</b> HUD Handbook does not exclude one-time expenses and includes examples such as wheelchairs, scooters, et. Recommend bringing consistent with Handbook. Sarah: not sure if SHRA agreed or not to this.</p>	<p>We already have the language included in the ACOP, page 6-16, bullets 2 and 6., per HUD handbook and IRS Medical expense write offs.</p>
<p><b>Chapter 9</b> <b>9-2:</b> Bolded language isn't quite right. The resident's lease wouldn't void, the PHA could seek to terminate on these grounds. You could probably say the sublease or the assignment is void – is that that is meant? If yes, recommend changing the wording. If no, recommend deleting. Sarah: Has been in the ACOP for a while.</p>	<p>We can change the language to read: <i>“Any attempt to assign or sublease the dwelling unit shall be void in ab initio and shall constitute good cause for termination of the lease.”</i></p>
<p><b>9-2:</b> Historically, we see families that for a variety of reasons end up with others (often adult children) using their mailing address even when they do not live there. Our view is such residents should not be subject to termination for this alone and should be removed. We know this is sensitive issue for SHRA</p>	<p>Feedback noted, however, PH will not be changing its policy at this time.</p>

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<p>historically, so we would propose providing an exception to adult children, e.g., under 25. Sarah: It is common for young adults to use parent's addresses. Can SHRA consider young adults to be under 25?</p>	
<p><b>9-5:</b> The new addition should be slightly amended to: <i>“The resident acknowledges and agrees that written permission from the PHA to do any of the above does not abrogate the resident’s obligation to abide by all other provisions of the lease or this ACOP.”</i> This is because written permission does change a resident’s obligation but I think what you’re getting at is the rest of their obligations hold.</p>	<p>We can change the language to read: <i>“The resident acknowledges and agrees that written permission from the PHA to do any of the above does not abrogate the resident’s obligation to abide by any and all provisions of the lease, attachments to the lease or this ACOP, except as expressly altered by such written permission.”</i></p>
<p><b>Chapter 23</b> Global Comment: It looks as though the numbers were not updated this year. That would allow for SHRA and the public to see if its language access efforts are having any effects.</p>	<p>We will do our due diligence and if there is a significant change, we will submit a Mid-Year change to address.</p>
<p><b>23-9:</b> <b>Regarding Recertification Appointments:</b> Do the Recert Packets include an advertisement in multiple languages that interpretation services are available and how to access it? If not, recommend adding to plan and to practice. Sarah: Page 3 of Chapter 23: could not tell if the Recert packet Cover Sheet is available in multiple languages. Do we know?</p>	<p>HA will access language data and will create the recertification packages with the appropriate documents based on the results of the language data info.  HA can include Language Flashcards with the Recert packages and provide translation services based on the language selection.</p>
<p><b>23-10:</b> <b>Addit’l Outreach for HCV:</b> Recommend updating and expanding this list and especially searching the</p>	<p>HCV will provide an update on this item.</p>

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<p>Hmong news outlets given that language is in the Top 5. Sarah: There are 4 non-English languages. Can we update?</p>	
<p><b>23-22:</b> <b>Vital Docs:</b> There are several critical documents where there is no translation or summary provided that we think should be moved up on the priority list, including:</p> <ul style="list-style-type: none"> <li>• Notice of Mandatory Resident Conference</li> <li>• Notice of Property Term HCV</li> <li>• Recert Notice</li> <li>• SANs (HCV document)</li> <li>• Termination of HCV Eligibility</li> <li>• PH Application</li> <li>• Leases</li> <li>• 3, 14 and 30-Day Notices</li> <li>• Hearing Notice</li> <li>• Termination Letter – PH</li> </ul> <p>Sarah; Can we work on full translation of the Vital Documents, especially the ones listed here?</p>	<p>If a resident’s primary language is one of the identified languages (per HUD regulations) which requires translation, we will provide translation of the appropriate documents translated in the language.</p> <p>PH will include the Language Identification Flashcard (DB-3309) with all documents sent to the residents.</p> <p>The highlighted items are not PH documents. PH will address the PH forms only.</p>