

Chapter	Section	Title	Page #	Current Policy/Language	Suggested Policy/Language
		HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN			
4	4-I.B	APPLYING FOR ASSISTANCE [HCV GB, PP. 4-11 - 4-14, Notice PIH 2009-36	4.2	Families may apply for the wait list through the ECC/HANH Applicant portal to ecc.myhousing.com. If the applicant needs a reasonable accommodation to complete the pre-application, the applicant may contact the Reasonable Accommodation Manager at 203-498-8800 x1507. Application forms at ECC/HANH website www.elmcitycommunities.com or United Way's 211 Infor line at http://www.cthcvp.org. A family may request to pick up an application form at the agency offices or to have the application mailed to them as a reasonable accommodation.	Families may apply for the wait list through the ECC/HANH Applicant portal to https://ecc.myhousing.com . If the applicant needs a reasonable accommodation to complete the pre-application, the applicant may contact the Reasonable Accommodation Manager at 203-498-8800 x1507. Application forms can also be obtained at the ECC/HANH website www.elmcitycommunities.org or United Way's 211 Infor line at http://www.cthcvp.org. A family may request to pick up an application form at the agency offices or to have the application mailed to them as a reasonable accommodation. All applications received via mail will be date and time stamped. Mailed applications will be added to the waitlist based on the date and time that they are stamped as received.
4	4-II.C	OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206]	4.7		6. ECC/HANH will offer preference to the families who reside in the City of New Haven. 7.ECC/HANH will offer preference to families who reside in the New Haven County.

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4	4-II.B	SELECTION AND HCV FUNDING SOURCES - Regular HCV Funding	4.11		<p>Emergency Housing Vouchers</p> <p>The American Rescue Plan (ARP) of 2021, section 3202 created the Emergency Housing Vouchers for individuals and families who are experiencing homelessness; at risk of experiencing homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; or were recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing stability. ECC was allocated 37 EHV effective July 1, 2021. After September 30, 2023 a PHA may not reissue any previously leased EHV, regardless of when the assistance for the formerly assisted family ends or ended. All referrals must come through the CoC Coordinated Entry system or from a Victims Services Provider. The CoC agrees to fulfill its responsibilities of prioritizing individuals and families for EHV assistance, determining the homelessness eligibility, referring individuals and families through the CoC's coordinated entry system, supporting individuals and families in processing voucher applications, supporting the housing search process, and planning for and coordinating the delivery of supportive services to support the housing stability of EHV participants.</p>
8	8-II.B.	INITIAL HQS INSPECTION [24 CFR 982.401(a)]	8.9		<p>Per the Housing Opportunity Through Modernization Act of 2016 (HOTMA) PIH 2017-20 (HA)</p> <p>(1) ECC/HANH can make HAP payments on a unit up to 30 days if an initial inspection reveal non-life-threatening defects;</p> <p>(2) ECC/HANH can authorize occupancy of a unit before ECC/HANH's HQS inspection if the property has met the requirements of an alternative inspection in the previous 24 months.</p>
8	8-II.C	ANNUAL/BIENNIAL HQS INSPECTIONS [24 CFR 982.405(a)]			<p>HOTMA (PIH 2017-20 (HA)) also includes two major provisions related to HQS enforcement:</p> <p>(1) Makes the timeframe for correcting deficiencies statutory (24 hours for life-threatening and 30 days for other unless ECC/HANH determines otherwise); (2) Provides families 90 days to relocate to a new unit if an owners fails to correct HQS deficiencies and allows ECC/HANH up to 2 months of any withheld or abated HAP for costs directly associated with relocation of these families.</p>

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17	17-II.B	OWNER PROPOSAL SELECTION PROCEDURES [24 CFR 983.51(b)] - ECC/HANH-Owned Units [24 CFR 983.51(e) and 983.59 and Notice PIH 2015-05]	17.8	ECC/HANH Policy -ECC/HANH may submit a proposal for project-based housing that is owned or controlled by ECC/HANH. If the proposal for ECC/HANH-owned housing is selected, ECC/HANH will use an authorized approved entity to review the ECC/HANH selection and to administer the PBV program. ECC/HANH will obtain HUD approval of the authorized approved entity prior to selecting the proposal for ECC/HANH-owned housing.	ECC/HANH Policy - ECC/HANH may submit a proposal for project-based housing that is owned or controlled by ECC/HANH. If the proposal for ECC/HANH-owned housing is selected, ECC/HANH will use an authorized approved entity to review the ECC/HANH selection and to administer the PBV program. ECC/HANH will obtain HUD approval of the authorized approved entity prior to selecting the proposal for ECC/HANH-owned housing. Per the Housing Opportunity Through Modernization Act of 2016 (HOTMA) PIH 2017-20 (HA), ECC/HANH may attach assistance to structures that it has ownership or control without using the competitive process.
17	17-II.D	17-III.D. INSPECTING UNITS - Pre HAP Contract Inspections	17.20		Per the Housing Opportunity Through Modernization Act of 2016 (HOTMA) PIH 2017-20 (HA) (1) ECC/HANH can make HAP payments on a unit up to 30 days if an initial inspection reveal non-life-threatening defects; (2) ECC/HANH can authorize occupancy of a unit before ECC/HANH's HQS inspection if the property has met the requirements of an alternative inspection in the previous 24 months.
17	17-II.D	INSPECTING UNITS Annual/Biennial Inspections	17.20		HOTMA (PIH 2017-20 (HA)) also includes two major provisions related to HQS enforcement: (1) Makes the timeframe for correcting deficiencies statutory (24 hours for life-threatening and 30 days for other unless ECC/HANH determines otherwise); (2) Provides families 90 days to relocate to a new unit if an owners fails to correct HQS deficiencies and allows ECC/HANH up to 2 months of any withheld or abated HAP for costs directly associated with relocation of these families.

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17	17-V.B	HAP CONTRACT REQUIREMENTS - Term of HAP Contract [24 CFR 983.205]	17.26		Per the Housing Opportunity Through Modernization Act of 2016 (HOTMA) PIH 2017-20 (HA). ECC/HANH may enter into a HAP contract with an owner for an initial term of no less than one year and no more than 20 years for each contract unit. The length of the term of the HAP contract for any contract unit may not be less than one year, nor more than 20 years. In the case of ECC/HANH-owned units, the term of the HAP contract must be agreed upon by ECC/HANH and the independent entity approved by HUD [24 CFR 983.59(b)(2)]. At the time of the initial HAP contract term or any time before expiration of the HAP contract, ECC/HANH may extend the term of the contract for an additional term of up to 20 years if ECC/HANH determines an extension is appropriate to continue providing affordable housing for low-income families. A HAP contract extension may not exceed 20 years. ECC/HANH may provide for multiple extensions; however, in no circumstances may such extensions exceed 20 years, cumulatively. Extensions after the initial extension are allowed at the end of any extension term, provided that not more than 24 months prior to the expiration of the previous extension contract ECC/HANH agrees to extend the term, and that such extension is appropriate to continue providing affordable housing for low-income families or to expand housing
18	4-I.B	APPLYING FOR ASSISTANCE [HCV GB, PP. 4-11 - 4-14, Notice PIH 2009-36]	18.28		ECC/HANH Policy When opening the waiting list, ECC/HANH or the 3rd Party entity will publicly announce the accepting of applications (see Section 4-II-C). Families may apply for the wait list through the ECC/HANH Applicant portal at https://ecc.myhousing.com or the 3rd Party website. If the applicant needs a reasonable accommodation to complete the pre-application, the applicant may contact the 203-498-8800 x1507. Application forms can also be obtained at the ECC/HANH website at www.elmcitycommunities.org or United Way's 211 Info line at http://www.cthevp.org . A family may request to pick up an application form at the agency offices or to have the application mailed to them as a reasonable accommodation.
18	4-I.B	APPLYING FOR ASSISTANCE [HCV GB, PP. 4-11 - 4-14, Notice PIH 2009-36]	18.28		All applications received via mail will be date and time stamped. Mailed applications will be added to the waitlist based on the date and time that they are stamped as received. Only one application will be accepted per family; duplicate applications will be discarded. Applications received after the published deadline date will be rejected. Completed applications must be submitted via the Wait List portal. Applications must be complete in order to be accepted by the ECC/HANH for processing. If a pre-application is incomplete, the ECC/HANH will not accept the application but will instead notify the applicant by mail or email, if applicable, that the application is incomplete and has been denied. An applicant whose application has been denied for being incomplete or for not meeting the published application criteria will be provided with the opportunity to appeal ECC/HANH's decision that the application was incomplete or for not meeting the published application criteria within 10 business days of the notice of application denial.

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18	4-III.C	SELECTION METHOD - Local Preferences [24 CFR 982.207; HCV p 4-16	18.30	The ECC/HANH offers preferences to the below families in the stated order.	The ECC/HANH offers preferences to the below families in the stated order. These preferences apply to the LIHTC/PBV and LIPH units only. For the RAD units, please refer to the applicable Resident Selection Plans.
18	4-III.C	SELECTION METHOD - Waiting Lists for Converted Units	18.37		First priority: Subject to preference for families residing in the existing developments (right to return families) at the time of issuance of the RAD Conversion Commitment (the “RCC”). Second priority: Interested applicants on the site-based waiting lists for the properties at the time of approval of the RCC, over all other applicants based on their position on the existing site-based waiting lists. Third priority: At the time of the issuance of the RCC, applicants on the ECC Housing Choice Voucher Wait List shall also be contacted to determine if they are interested in being placed on the Development Waiting List. Applicants on the existing HCV Waitlist will be given third priority over all other applicants based on their position on this list. Fourth priority: Applicants on the RAD site based waiting.
18	PART IV. 4-IV.A	VAWA APPLICANT WAITLIST & TRANSFER WAITLIST PREFERENCE	18.39	Resident transfer is allowable from one LIHTC/RAD/PBV development to another subject to applicable LIHTC income guidelines	Resident transfer is allowable from one LIHTC/RAD/PBV development to another subject to applicable LIHTC income guidelines. This includes the LIPH units.
18	PART IV. 4-IV.A	RESIDENT TRANSFER POLICY	18.39	Preferences for transfers are as follows: Transfers from one LIHTC/RAD/PBV development are allowable for Reasonable Accommodation and VAWA subject to applicable LIHTC income guidelines	Preferences for transfers are as follows: (Applies to LIHTC ACC and PBV only). 1) Emergency (applies to LIHTC ACC, PBV and PBV/RAD)
18	PART IV. 4-IV.A	RESIDENT TRANSFER POLICY	18.40	Transfers from one LIHTC/RAD/PBV development are allowable for Reasonable Accommodation and VAWA subject to applicable LIHTC income guidelines	Transfers from one LIHTC/RAD/PBV development are allowable for Reasonable Accommodation and VAWA subject to applicable LIHTC income guidelines. This includes LIPH units.

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18	4.IV.C	EMERGENCY TRANSFER PROCEDURES	18.41	If the transfer is necessary because of maintenance or other life-threatening conditions defined above, and an appropriate unit is not immediately available, Owner will provide temporary accommodations to the tenant by arranging for temporary lodging at a hotel or similar location. If the conditions that required the transfer cannot be repaired, or the condition cannot be repaired in a reasonable amount of time, Owner will transfer the resident to the first available and appropriate unit after the temporary relocation. Emergency transfers are mandatory for the tenant. Refusal of a resident to accept an emergency transfer is grounds for termination of assistance or lease termination and eviction.	If the transfer is necessary because of maintenance or other life-threatening conditions defined above, and an appropriate unit is not immediately available, Owner will provide temporary accommodations to the tenant by arranging for temporary lodging at a hotel or similar location. If the conditions that required the transfer cannot be repaired, or the condition cannot be repaired in a reasonable amount of time, Owner will transfer the resident to the first available and appropriate unit after the temporary relocation. Emergency transfers are mandatory for the tenant. Refusal of a resident to accept an emergency transfer is grounds for termination of assistance or lease termination and eviction. “In cases where ECC/HANH does not have a unit available for an emergency transfer ECC/HANH can transfer the resident to one of its affiliated entities.”
18	17-II.B	OWNER PROPOSAL SELECTION PROCEDURES [24 CFR 983.51(b)] - Ownership and Control	18.119		Per the Housing Opportunity Through Modernization Act of 2016 (HOTMA) PIH 2017-20 (HA). ECC/HANH may attach assistance to structures that it has ownership or control without using the competitive process.
		ECC/HANH HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN (ADMIN PLAN) ADDENDUM 3 HUD COVID WAIVERS			Addendum 3
		ECC/HANH ADMISSION AND OCCUPANCY PLAN (ACOP) ADDENDUM 2 HUD COVID-19 WAIVERS			Addendum 3
		ADMISSIONS AND CONTINUED OCCUPANCY POLICY			

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1	Part II	THE PUBLIC HOUSING PROGRAM: OVERVIEW AND HISTORY OF THE PROGRAM		This ACOP is set forth to define ECC/HANH's local policies for operation of the housing programs in accordance with federal laws and regulations. All issues related to the LIPH program not addressed in this document are governed by such federal regulations, HUD handbooks and guidebooks, notices, and other applicable law. The policies in this ACOP have been designed to ensure compliance with the consolidated ACC and all HUD-approved applications for program funding.	This ACOP is set forth to define ECC/HANH's local policies for operation of the housing programs in accordance with federal laws and regulations. All issues related to the LIPH program not addressed in this document are governed by such federal regulations, HUD handbooks and guidebooks, notices, and other applicable law. The policies in this ACOP have been designed to ensure compliance with the consolidated ACC and all HUD-approved applications for program funding. The policies in the ACOP apply to all ACC units and LIPH residents, including those in third party LIHTC properties.