



A COMMUNITY OF POSSIBILITIES

Summary of Revisions to FY 2025 - 2026 Admissions & Continued Occupancy Plan

Indicates policy has been added

~~Indicates policy has been removed~~

Reasonable Accommodations Responses

Reason for Change to 2.2.E Approval/Denial of a Requested Accommodation [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations Under the Fair Housing Act, Notice PIH 2010-26]

This section update may impact current residents and applicants. The language in section 2.2.E(3) has been revised to allow the 504 Coordinator to respond to participants within 30 calendar days after they submit a Reasonable Accommodation request instead of the previous 10 business days. This policy update puts residents first by allowing additional time to provide missing or incomplete documentation to fulfill reasonable accommodation requirements.

2.2.E Approval/Denial of a Requested Accommodation [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations Under the Fair Housing Act, Notice PIH 2010-26]

- (1) Opportunity Home must approve a request for an accommodation if the following three conditions are met:
 - (a) The request was made by or on behalf of a person with a disability.
 - (b) There is a disability-related need for the accommodation.
 - (c) The requested accommodation is reasonable, meaning it would not impose:

- (3) After a request for an accommodation is presented, Opportunity Home will respond in writing within ~~10 business days~~ 30 calendar days.

Informal Hearing Responses

Reason for the Addition of 14.3.H(b) Informal Hearings for Participants [24 CFR 982.555]

The change to section 14.3.H(b) may affect current residents. The updated language allows the Informal Hearing Officer to provide a written decision to the family no later than 15 business days after the informal hearing takes place. This is an extension of 5 business days beyond the previous policy, which required a decision within 10 business days. The 15 business-day policy would align with other public housing agencies and is the recommended standard by housing organizations.

14.3.H Decision of the Hearing Officer [24 CFR 966.57]

- (1) The hearing officer must issue a written decision, stating the reasons for the decision, within a reasonable time after the hearing. Factual determinations relating to the individual circumstances of the family must be based on a preponderance of evidence presented at the hearing. A copy of the decision must be sent to the complainant and Opportunity Home. Opportunity Home must retain a copy of the decision in the tenant's folder. A log of all hearing officer decisions must also be maintained by Opportunity Home and made available for inspection by a prospective complainant, their representative, or the hearing officer [24 CFR 966.57(a)].

- (b) The hearing officer will issue a written decision to the family and Opportunity Home no later than 15 business days ~~10 business days~~ after the hearing. The report will contain the following information:

Local Residency Preference

Reason for the Change to 4.3.B Selection Method

This change may affect applicants. Section 4.3.B(2)(g) now includes language to establish a local residency preference for the San Antonio area. The local residency preference would allow Opportunity Home to prioritize the housing needs of local San Antonio residents.

4.3.B Selection Method

(2) Local Preferences [24 CFR 960.206]

- (a) Opportunity Home is permitted to establish local preferences, and to give priority to serving families that meet those criteria.
- (b) HUD specifically authorizes and places restrictions on certain types of local preferences.
- (c) HUD also permits Opportunity Home to establish other local preferences, at its discretion.
- (d) Any local preferences established must be consistent with Opportunity Home's plan and the consolidated plan, and must be based on local housing needs and priorities that can be documented by generally accepted data sources [24 CFR 960.206(a)].

(e) Opportunity Home's selection method will be based on local preference with assigned points and date and time of the submitted application.

(g) Waiting List Preferences

Applicants will retain the assigned points throughout the waiting list, eligibility and offer process.

- (vi) **San Antonio Residency Preference (25 Points) – Families must reside in, work in, or be hired to work in San Antonio and/or surrounding municipalities.**

Early Engagement Program

Reason for the Addition of Section 4.3.E Early Engagement Program

The new section 4.3.E may impact program applicants. The new section includes the policy for the Early Engagement Program, which will require applicants selected from the waitlist to attend an Opportunity Home-sponsored briefing before or after determining eligibility for participation.

4.3.E Early Engagement Program

All applicants selected from the waiting list, with the exception of elderly and disabled applicants must attend an Opportunity Home-sponsored Early Engagement Program (EEP) briefing before or after they are determined eligible for participation. Generally, applicants are required to attend the EEP briefing prior to leasing. However, Opportunity Home may waive this requirement and permit leasing to an applicant before they have attended the EEP briefing, if doing so would remove a barrier for the family in quickly securing and/or leasing a suitable unit. Failure to attend a required EEP briefing may be cause for denial.

Removal From the Waitlist - EEP

Reason for the Change to 4.2.F(3) Removal from the Waiting List

This change may affect applicants. Section 4.2.F(3)(e) has been updated to state that applicants who fail to attend a required EEP briefing may be removed from the waitlist.

(3) Removal from the Waiting List

(e) Under any of the following conditions, applicants will be removed from the waiting list for all preferred developments:

(ix) The applicant failed to respond and attend an Early Engagement session as required for admittance into the Public Housing program;

Determining Bedroom Size

Reason for the Change to 5.1.B Determining Unit Size

This change may affect applicants and residents. Section 5.1.B(2)(a) has been updated to clarify that Opportunity Home may allow a living room to be used as a sleeping (bedroom) space, but no more than two persons may occupy the space.

5.1.B Determining Unit Size

- (1) In selecting a family to occupy a particular unit, Opportunity Home may match characteristics of the family with the type of unit available, for example, number of bedrooms [24 CFR 960.206(c)].
- (2) HUD does not specify the number of persons who may live in public housing units of various sizes. Opportunity Home is permitted to develop appropriate occupancy standards as long as the standards do not have the effect of discriminating against families with children [PH Occ GB, p. 62].

- (a) Opportunity Home will use the same occupancy standards for each of its developments.

- (ii) Persons of different generations will not be required to share a bedroom.
- (iii) Live-in aides will be allocated a separate bedroom. No additional bedrooms will be provided for the live-in aide's family.
- (iv) Single person families will be allocated a zero or one bedroom.
- (v) A living room may be used as a sleeping (bedroom) space, but no more than two persons may occupy the space.

Number of Unit Offers for Applicants

Reason for the Change to 5.2.B Number of Offers



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This change may affect applicants. Section 5.2.B(1) has been updated to allow Opportunity Home to extend up to two unit offers to applicants rather than only one.

5.2.B Number of Offers

(1) Opportunity Home has adopted the following unit offer plan:

~~One (1)~~ Up to Two Unit Offers:

- (a) The applicant will be offered a suitable unit at their preferred development.
- (b) The applicant will be given a maximum of two unit offers. Exceptions may be made only in cases where the applicant has demonstrated good cause for unit refusal, as outlined in section 5.2.D.