


MASSACHUSETTS
RENTAL VOUCHER
PROGRAM (MRVP)

ADMINISTRATIVE
PLAN TRAINING

Module #7:

Redetermination of Tenant Rent Share



June 2023

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Welcome

- Welcome to the MRVP Administrative Plan training.
- Over the course of the next several months, we will conduct training sessions on commonly applied MRVP policies.
- Each session will cover a section/chapter or grouping of sections/chapters from the MRVP Administrative Plan.
- Each session and training module focuses on the application of MRVP program policies for specific program elements.

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Training Curriculum & Schedule

#	Topics	Admin Plan Chapter(s)	Date
✓ 1.	• Training Introduction, MRVP Regulations & Governance • Eligibility, Issuance Briefing & Voucher	Chapters 1, 4, 6	March 2023
✓ 2.	• Verification	Chapters 7-8	March 2023
✓ 3.	• Calculation of Income & Voucher Payments	Chapter 7	April 2023
✓ 4.	• General Leasing Procedures & MRVP Lease Addendum	Chapters 9-10	April 2023
✓ 5.	• Voucher Payment Contract • Rent Reasonableness & Rent Increases	Chapters 11 & 12	May 2023
✓ 6.	• Relocation & Project Based Voucher Transfers	Chapters 13 & 14	June 2023
➔ 7.	• Redetermination of Tenant Rent Share	Chapter 16	June 2023
8.	• Terminations & Grievances	Chapter 17	June 2023
9.	• Program Administration & Program Integrity	Chapters 18-19	July 2023

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Today's Session

- Today's session will cover the following areas:
 - Recertification
 - Interim Reexaminations
 - Changes in Household Composition
 - Change in Head of Household
 - Change in Voucher Size
 - Relocation
 - Rent Share Grievances

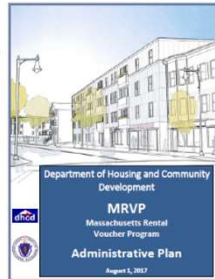
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Resource Materials

- Use EOHLC's MRVP Administrative Plan to ensure consistent application of policies and procedures.
- The policies we are reviewing today are found in Chapter 16 of the Administrative Plan.
- The goal is to know where to find the information you need and to correctly apply policies.



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Overview

- Redeterminations of Tenant Rent Share allow AAs to verify continued program eligibility of a Participant Household.
- A redetermination may be necessary when income or household composition changes.

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Regular Recertification

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Regular Recertification

- Through 12/31/2023, a Household's income and composition must be recertified at least once per year while in MRVP.
- Beginning 1/1/24, a Household's income and composition must be recertificated every other year (biennially).
- AAs must decide which Households will be recertified in 2024 or 2025 (and subsequently every other year).
 - Prior to 1/1/24, EOHLC will provide suggested language to communicate to Participants about switching to biennials.

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Regular Recertification

- During recertifications the Household must provide documentation of the following:
 - Income
 - Assets
 - Deductions
 - Any changes to Household composition.
- Failure to provide requested documentation can be grounds for termination from MRVP.
- The AA must endeavor to verify all information with a third party.

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Regular Recertification

- At the annual or biennial recertification, the AA shall require a government-issued photo ID from any Household member that has turned 18 since the last recertification.
 - If the Household member cannot obtain a government-issued photo ID, they must attest to that fact and also provide either a birth certificate or Social Security card.
- The AA shall also run a CORI and SORI check on any Household member that has turned 18 years old since the last recertification.

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Regular Recertification

- The AA shall adjust the Tenant Rent Share and Voucher Size (if applicable) appropriately based on any changes in Household income, deductions, or composition.
- Updated information must be mailed to the Participant and Owner at least 30 days before the changes become effective.

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Interim Reexaminations

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Interim Reexaminations

- Interim reexaminations are those completed in between regular recertifications based on changes reported by the Household or information obtained from a third party, such as Wage Match.
- The entire Household's income and composition are not considered, **only the change reported by the Household.**

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Interim Reexaminations – Payment Standards

- Payment Standards are only updated at interim reexaminations if the Contract Rent is increased and the Payment Schedule has increase since the Household's last Tenant Rent Share Calculation.

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Decrease in Income (or Increase in Deductions)

- If a Household's net income decreases and the Household informs the AA of the change, the AA shall reexamine the Tenant Rent Share to determine if a change of rent share is needed.
- A decrease in net income could result from either a decrease in gross income or an increase in eligible deductions.
- All net income decreases must be verified before changes to the Voucher Payment can be made.

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Decrease in Income (or Increase in Deductions)

- If the Participant requests a redetermination and it would lower the Tenant Rent Share then an interim reexamination must be completed, regardless of the amount of the change to the Tenant Rent Share.
- All changes to the Voucher Payment shall be effective the first of the month following the **date the change was reported to the AA**.

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Increases in Income / Decrease in Voucher Payment

- An MRVP Participant is required to inform the AA of **all increases in the Household's monthly income within 30 days of the change**.
- Generally, increases in unearned income of 10% or more shall cause the AA to perform an interim recertification (earned income is noted on next slide).
- The decrease in Voucher Payment will take effect the first day of the second month following submission of the new income information (to allow for 30 days' notice of an increase in Tenant Rent Share).

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Decrease in Voucher Payment Due to Increase in Earned Income

- If the household has an increase in or has obtained **earned income**:
 - This shall **not** be counted until the date of the Household's next recertification or relocation, **unless**:
 - The household's rent share was previously reduced within the past three calendar months through an interim reexamination;
 - The household is zero income; or
 - Participants in the MassLEAP program may decide to have an interim reexamination preformed to count increases in earned income if they wish.

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Failure to Report Increase

- Failing to report an increase in income or provide documentation of an income increase are cause for termination from MRVP.
- If the AA determines that the failure was a good faith error and the Participant is not terminated, then the Voucher Payment must be adjusted retroactively to the date that such change would have taken effect had the increase been properly reported.
- The AA may enter into a repayment agreement with the Participant for the difference rather than requiring the Participant to immediately reimburse the AA for any excess Voucher Payments.

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Brain Teaser #1

- Robert reaches out to the AA on March 28th to report that his hours were reduced at work from 40 hours a week to 25 hours a week as of March 21st. He gets paid bi-weekly and has not received his most current pay-stub yet.
- Robert provides verification to the AA once he receives his pay-stub on April 4th. He provides a second paystub to the AA on April 18th, which verifies that his hours have been reduced.
- When should the interim be made effective?
 - A. March 1
 - B. April 1
 - C. May 1

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Brain Teaser #2a

- The Martinez household consists of two members, Daniel and Carmen. At the household's last recertification effective for November 1st, 2021 Carmen reported to be zero income and Daniel was receiving an annual salary of \$20,000 per year.
- Carmen begins receiving SSI benefits on April 1st, 2022 in the amount of \$824 per month. She provides the benefit letter to the AA on April 15th.
- Are they required to report this income to the AA?
 - A. Yes
 - B. No

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Brain Teaser #2b

- The Martinez household consists of two members, Daniel and Carmen. At the household's last recertification effective for November 1st, 2021 Carmen reported to be zero income and Daniel was receiving an annual salary of \$20,000 per year.
- Carmen begins receiving SSI benefits on April 1st, 2022 in the amount of \$824 per month. She provides the benefit letter to the AA on April 15th.
- Should the income be counted?
 - Yes
 - No

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Brain Teaser #2c

- The Martinez household consists of two members, Daniel and Carmen. At the household's last recertification effective for November 1st, 2021 Carmen reported to be zero income and Daniel was receiving an annual salary of \$20,000 per year.
- Carmen begins receiving SSI benefits on April 1st, 2022 in the amount of \$824 per month. She provides the benefit letter to the AA on April 15th.
- When should the interim be effective?
 - November 1
 - April 1
 - June 1

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Brain Teaser #2c

- The Martinez household consists of two members, Daniel and Carmen. At the household's last recertification effective for November 1st, 2021 Carmen reported to be zero income and Daniel was receiving an annual salary of \$20,000 per year.
- Carmen begins receiving SSI benefits on April 1st, 2022 in the amount of \$824 per month. She provides the benefit letter to the AA on April 15th.
- Bonus question: What percentage did the household's income increase by?

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Changes in Household Composition

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Changes in Household Composition

- The Participant must notify the AA whenever there is a change in Household composition.

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Removal of Household Member

- Removal of a Household member does not require prior approval by the RAA
- However, verification is needed before the member and their income can officially be removed.

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Addition of Household Member

- Most additions to a Household require prior approval from the AA.
- New household members must be found eligible for MRVP in order to be added to the household's voucher.
- The addition of household members under the age of 18 through birth, adoption, or court ordered custody do not require prior permission, and those new Household members do not need to be found eligible for MRVP to be added to the Household's Voucher, but the AA must be alerted within 30 days.

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Changes in Household Composition

- When there is a change in household composition between regular recertifications an interim reexamination must be completed.
- AAs must also send written verification of the change in Household composition as well as any changes to the tenant rent to both the Participant and Owner. Such verification is sufficient to alter the Voucher and a new Lease is not needed.

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Decrease in Tenant Rent Share

- Decrease in Tenant Rent Share may only be made retroactively to the first of the month following the date the AA was notified of the change in household composition (except in cases of death).
 - For example, if the AA was notified on June 30th that a member had left the household, but the information wasn't processed in the software system until mid-July, the AA would make the change effective retroactive to July 1st.

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Increase in Tenant Rent Share

- Increase in Tenant Rent Share (and corresponding decrease in voucher payment) require 30 days' notice to the Participant and Owner (unless the change in Household composition was not reported within 30 days), although the change in Household may be effective immediately.

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Changes in Household Composition

- If an AA was not properly notified of a change of Household composition then the Household may be terminated from MRVP.
- If the Household is not terminated, the AA shall pursue a repayment agreement for any overpaid voucher payments, resulting from the delay in reporting the change.

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Death of Head of Household – Sole Household Member

- If the Head of Household is the only Household member and passes away, the Household is automatically terminated from the program.
- The termination is effective for the end of the month that the Participant passed away, regardless of when the Owner and/or AA was informed of the death.
- Family members of the Participant nor anyone else may make claim to the Voucher and be awarded it.
- No notification is required prior to termination, except for the termination notice, and Grievances may not be filed.

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Death of a Household Member

- In cases where a Household member who is not the Head of Household passes away, the AA should be informed immediately.
- Verification of death is required, such as an obituary, newspaper article, or funeral announcement.
- Once the death has been verified, the AA shall:
 - Remove the Household member from the Household
 - Make any necessary changes to the Tenant Rent Share (retroactively, if necessary)
 - Send written verification to the Participant and Owner.

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Removal of an Adult

- AAs must require two pieces of information before the Household member—and their income—can officially be removed from the Household:
 - Written request by the Household member to be removed from the Household, including actual move-out date and new contact information
 - Verification of the new address, such as a change of address confirmation, new lease, or utility bills at new unit.

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Removal of an Adult

- If the Head of Household is no longer in contact with the removed Household member or that Household member is not able to be contacted, such as in cases of incarceration or domestic violence, the Head of Household may provide written verification of the Household member's departure.
- Included shall be the reason for removal, reason why the Household member cannot provide documentation, and any contact information, if known.

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Removal of a Minor

- If a Household member under the age of 18 is removed from a Household, regardless of the circumstance, the AA must collect written verification from the Head of Household that the minor is being removed from the Household and the reason for removal.
- Third party verification of the child's removal is also required.

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Removal of a Minor

- Third party verification can include:
 - Court order granting primary custody to a non-Household member
 - Verification of enrollment in a new school
 - Legal agreement granting guardianship or custody of the minor to a non-Household member, which does not need to be a court order
 - Verification from the Department of Children and Families (DCF) that the child has been removed from the Household and the removal is expected to be permanent.

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Removal of a Minor

- In cases where DCF confirms that the removal is temporary or that family unification is still a goal, the minor shall not be removed from the Household for MRVP purposes.
- To be considered a member of the Household, a minor has to reside in the Household over 50% of the time.

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Addition of an Adult

- All additions of any person age 18 or older to the Household must be approved by the AA and the Owner.
- All potential adult Household members must complete or provide the following:
 - General release of information
 - CORI release
 - Vital information and documents
 - Social security number, to be used to verify income and eligibility
 - Verification of all income, expenses, deductions, and assets
 - Written permission from the Owner (if applicable)

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Addition of an Adult

- All new adult Household members must meet all eligibility criteria, except for income and asset eligibility.
- Even if the new Household member's income makes the Household over-income, the member may still be added. Once added, the Household shall be sent a termination notice for being over income.

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Addition of an Adult

- Based on the Household's size, unit size, and Owner response, adults may be approved to be immediately added to the Household or to be added once the Household relocates to another unit.
- If the addition of the adult will cause the Household to be overcrowded, the adult shall only be added to the Household upon relocation.

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Addition of a Personal Care Attendant (PCA)

- All additions of a PCA must be approved by the AA and Owner. All new PCAs must meet all eligibility criteria, except for income and asset eligibility.
- The Household must also provide verification that a Household member requires assistance of a PCA due to a disability.
- All potential PCAs must complete or provide the following:
 - General release of information
 - CORI release
 - Vital information and documents
 - Social security number, to be used to verify eligibility
 - Written permission from the Owner (if applicable)

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Addition of a Personal Care Attendant (PCA)

- Only one bedroom may be added to the voucher size to accommodate a PCA, even if PCA duties are shared by more than one part-time PCA or the PCA has additional family members that live with them.
- Based on the household's size, unit size, and Owner response, PCAs may be approved to be immediately added to the Household or to be added once the Household relocates to another unit.
- If the addition of the PCA will cause the household to be overcrowded, the PCA shall only be added to the household upon relocation.

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Addition of a Minor

- A minor can be added to a Household through birth, adoption, or court ordered custody at any time.
- Neither the AA nor the Owner may refuse the addition. This includes the addition of children through foster care.
- The minor's vital documents and any changes in income must be sent to the AA within 30 days of the addition.
- If the minor is under age of six, the AA must verify that the Contract Unit is lead safe.

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Addition of a Minor

- If the addition of the minor causes the Household to be **under-housed**, the AA shall not view that as cause for the Participant to terminate the Lease.
- If the addition of the minor causes the Household to be overcrowded, then the AA will:
 - **Mobile Voucher**: terminate the Voucher Payment Contract for breach of the State Sanitary Code and issue the household a Mobile Voucher.
 - **Project Based Voucher**: add the Household to the Administrative Transfer Waiting List with an emergency preference.

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Voluntary Addition of a Minor

- If a minor is being added to the Household for reasons other than birth, adoption, or court awarded custody, the Owner and AA must approve the addition.
- The Participant must also supply the AA with verification that a Household member has custody of the minor, unless the minor is added to the Household at the same time as the minor's guardian.

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Situation	Acceptable Third-Party Verification Documents	Requires Owner Approval?
Death of HOH	Obituary, newspaper article, or funeral announcement	
Death of HH member	Obituary, newspaper article, or funeral announcement	
Removal of Adult	Verification of new address (change of address confirmation from PO, new lease, or utility bills) Written verification from HOH (if not in contact with member)	
Removal of Minor	Court order, school enrollment, legal agreement, verification from DCF regarding timeline for expected reunification	
Addition of an Adult	New household member screening documents	
Addition of a PCA	New household member screening documents (except income) Verification of need for PCA due to disability	
Addition of a Minor	Vital docs (i.e., birth cert. and SS card) Verification of adoption, court awarded custody, or guardianship (as applicable)	

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Change in Head of Household

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Change in Head of Household

- To change the Head of Household, both the current Head of Household and the proposed Head of Household must request the change in writing.
- The AA shall meet with both parties in person to verify that they would like to change the Head of Household.
- If the current or proposed Head of Household cannot meet with the AA in person or virtually, the request to change the Head of Household must be notarized.
- If both parties agree to the change in Head of Household, the AA shall complete an entire recertification of the Household's income and composition.

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Change in Head of Household

- To be eligible to be the Head of Household, a Household member must:
 - Be at least 18 years old
 - Have been an approved Household member for at least the previous **12** consecutive months
 - Be willing to abide by all Voucher and Lease terms and take over any repayments already in place
 - Pass a CORI and SORI
 - Provide government-issued photo ID.

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Change in Head of Household

- If the Head of Household changes, the previous Head of Household will no longer be considered the Head of Household and will lose all privileges afforded to Heads of Households.
- This includes the ability to add and remove Household members and change the Head of Household.
- The change in Head of Household cannot be reversed, unless both parties agree.

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Change in Head of Household

- Confirmation of the changes shall be sent to the Owner and both the previous and new Head of Household.
- The Owner may not contest the change in Head of Household.
- The previous Head of Household does not need to remain a Household member in order for the Household to remain an MRVP Participant and may be removed from the Household without adversely affecting the Household's MRVP participation.

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Change of Head of Household to Caregiver

- If the Head of Household passes away or is otherwise removed from the household, and there are minor children in the household:
 - If the adult who takes permanent custody of the children is eligible for MRVP (must be verified), then that adult may become the Head of Household and an MRVP Participant.
 - The Owner must accept the new Head of Household under the existing Lease.
 - If the adult who takes custody of the children is not MRVP eligible, then the Voucher must be terminated.

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Change of Head of Household to Caregiver

- If the adult taking permanent custody of the child(ren) has other Household members, those individuals also may be added to the Voucher, if otherwise eligible for MRVP.
- However, the Owner is not required to approve these additions to the Household under the MRVP Lease Addendum.
- All procedures outlined for Change of Head of Household apply, except that the former Head of Household does not need to request the change.

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Change of Head of Household to Caregiver

- When the minor children turn 18, they may remain in the Household, but they do not automatically have rights to the current Voucher as the Head of Household and are not entitled to issuance of a separate Voucher.

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Change of Head of Household Due to Family Break-Up

- If a Household breaks up into two otherwise eligible Households while receiving assistance, only one of the new Households will continue to be assisted.
- All decisions regarding the disposition of an MRVP Voucher in the event of a Household break-up will be made by the AA on a case-by-case basis after considering the circumstances of each individual case.
 - If a court decision exists, the AA shall abide by it.
 - Otherwise, AA's shall make the best reasoned decision following the procedures on the next slide.

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Change of Head of Household Due to Family Break-Up

- In the absence of a judicial decision, or an agreement among the original Household members, the AA shall determine which Household retains the voucher, taking into consideration the following factors:
 - The interest of any minor children, including custody arrangements
 - The interest of any ill, elderly, or disabled Household members
 - The interest of any Household member who is the victim of domestic violence, dating violence, sexual assault, or stalking including a Household member who was forced to leave an assisted unit as a result of such actual or threatened abuse
 - Any possible risks to Household members as a result of criminal activity
 - The recommendations of social service professionals

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Change of Head of Household Due to Family Break-Up

- Generally, the interests of minor children will take precedence over all other claims and the Voucher will remain with the Household member who has primary custody of the minor children.
- AAs must recognize that verification of legal custody may not always be possible, particularly in domestic violence situations. Custody or guardianship does not necessarily have to be court ordered, but it is subject to verification by the AA.
- Decisions made by the AA are final and a Grievance may not be filed. The AA cannot create two Vouchers from one (cannot "split the household").

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Change of Head of Household Due to Family Break-Up

- In situations where one parent of minor children in an assisted Household is the Head of Household, and custody is given to the parent who is not a member of the assisted Household, then the Voucher will remain with the children, as members of the assisted Household, provided the custodial parent Household is program eligible.
- The AA shall terminate the Voucher as soon as possible after notification of the new custody arrangement and issue a Voucher to the new Head of Household.

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Change of Head of Household Due to Family Break-Up

- In situations of split custody, where each parent or guardian receives custody of at least one child and only one of the separating parents or guardians was a member of the originally assisted Household, then the Voucher will remain with the original assisted Household.
- If both parents were members of the assisted Household or neither parent continues to live in an MRVP assisted unit, then the AA has discretion to determine who retains the Voucher considering the circumstances of the individual case.

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Change of Head of Household Due to Family Break-Up

- If there are no minor children, then the current Head of Household of record will retain the Voucher except when one of the following is a factor:
 - The interest of any ill, elderly, or disabled Household members;
 - The interest of any Household member who is or has been the victim of domestic violence, dating violence, sexual assault, or stalking and provides documentation in accordance with Chapter 18.5 of this Admin Plan; or
 - Any possible risks to Household members as a result of criminal activity.

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Change of Head of Household Due to Family Break-Up

- When the Household break-up is voluntary, the Voucher will not be transferred to a remaining Household member if that individual was not listed as a member of the Household with the AA for 12 months immediately prior to the transfer.

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Change in Voucher Size

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Change in Voucher Size

- Any changes in Voucher Size due to changes in Household composition will be effective at the Household's next regular recertification, or at relocation, whichever occurs first.

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Increase in Voucher Size

- If the Voucher Size increases, the Household may elect to move or request a transfer.
- If the household is overcrowded (as defined in the State Sanitary Code) relocation or transfer shall happen as soon as possible

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Decrease in Voucher Size

- If the Voucher Size decreases, the Household's Tenant Rent Share will likely increase when the Applicable Payment Standard is used to match the Voucher Size.
- The Household may choose to continue to reside in the unit and be over-housed or may relocate to a more appropriately sized unit.

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Decrease in Voucher Size

- If the Voucher Size of a Household with a Project Based Voucher decreases, the Household will be placed on the Administrative Transfer Waiting List.
 - Any Household that refuses an offer of housing assistance without good cause must be terminated from MRVP.
- Please refer to Training Module #6 for more detail on Project Based Transfer policies.

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Relocation

- A Household's income and composition must also be completely recertified whenever a new Lease is signed upon relocation, unless it was recertified within 60 days prior.
- Increases in Tenant Rent Share due to relocation do not require 30 days' notice.

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Relocation

- It is recommended that AAs collect updated income information every 90 days throughout the relocation process to correctly estimate and approve a maximum Contract Rent at initial occupancy of a new unit.
- As part of the recertification process, Voucher Size must be updated, if necessary.
- At relocation, the Applicable Payment Standard shall be used, and a Household previously held harmless shall not be anymore.

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Rent Share Grievances

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Rent Share Grievances

- If a Participant disagrees with their rent share then they may file a Grievance to have their Tenant Rent Share redetermined.
- The Grievance request must be submitted to the AA within 14 days of the notification of the new rent share from the AA.
- During the Grievance process, the Participant shall continue to pay the redetermined Tenant Rent Share.

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Rent Share Grievances

- If the Grievance results in a determination that the tenant rent share should have been lower than what was initially determined then the AA shall immediately pay the Owner any additional amount owed.
- In turn the Owner shall credit or reimburse the Participant the amount that was overpaid by the tenant. If the Owner fails to credit or reimburse the Participant, the AA may suspend the Owner's future Voucher Payments until the Owner credits or reimburses the Participant.

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Brain Teaser #4

- Fill in the blank with either "increase" or "decrease".

	Statement	Increase or Decrease?
1.	Generally, _____ in income of 10% or more shall cause the AA to perform an interim recertification, unless it is due to a change in earned income.	
2.	Failing to report a(n) _____ in income or provide documentation of an income _____ are cause for termination from MRVP.	
3.	When completing an interim due to a decrease in income, the _____ in the Voucher Payment will take effect the first day of the second month following submission of the new income information (to allow for 30 days' notice of an increase in Tenant Rent Share).	

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Questions?

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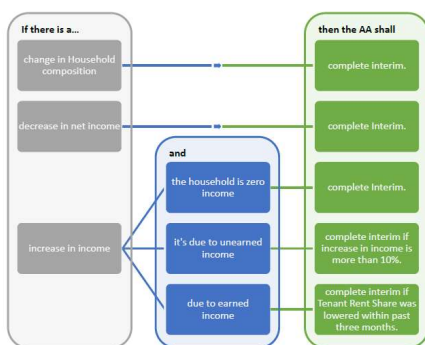
Key Takeaways

- An MRVP household's income and family composition is currently required to be recertified at least once per year, but will change to once every other year (biennial) starting in 2024
 - AAs must decide who will be recertified in 2024 or 2025
- Changes that occur during between annual reexaminations may require the participant to report and the AA to complete an interim reexamination, depending on the circumstances.

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Key Takeaways

- Participants are required to report changes in their household composition to the AA timely.
 - AA and Owner approval is required when the household requests to add an additional member to the voucher and lease, except if the addition is due to birth, adoption, or court-awarded custody.
 - AA's must verify removal of members before they can be officially be removed from the household.

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Key Takeaways

- Generally, updated information regarding tenant rent share and any other household changes should be mailed to the Participant and Owner at least 30 days before the changes become effective. However, this is not always possible or required in all cases.
- Any changes in Voucher Size due to changes in Household composition will be effective at the Household's next regular recertification, or at relocation, whichever occurs first.

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Key Takeaways

- If a Participant disagrees with their rent share, then they may file a Grievance to have their Tenant Rent Share redetermined. The request must be submitted to the AA within 14 days of the notification of the new rent share from the AA.

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Upcoming Sessions

#	Topics	Admin Plan Chapter(s)	Date
✓ 1.	• Training Introduction, MRVP Regulations & Governance • Eligibility, Issuance Briefing & Voucher	Chapters 1, 4, 6	March 2023
✓ 2.	• Verification	Chapters 7-8	March 2023
✓ 3.	• Calculation of Income & Voucher Payments	Chapter 7	April 2023
✓ 4.	• General Leasing Procedures & MRVP Lease Addendum	Chapters 9-10	April 2023
✓ 5.	• Voucher Payment Contract • Rent Reasonableness & Rent Increases	Chapters 11 & 12	May 2023
✓ 6.	• Relocation & Project Based Voucher Transfers	Chapters 12 & 14	May 2023
✓ 7.	• Redetermination of Tenant Rent Share	Chapter 16	June 2023
➔ 8.	• Terminations & Grievances	Chapter 17	June 2023
9.	• Program Administration & Program Integrity	Chapters 18-19	July 2023

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