

TERMINATION OF ASSISTANCE, HAP CONTRACTS, INFORMAL HEARINGS AND THE TERMINATION PROCESS
 NAHRO Professional Development



Professional Development

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TODAY'S FACULTY MEMBER

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POLL

How long have you been in affordable housing?

- A. Less than 1 year
- B. 2 - 5 years
- C. 6 - 10 years
- D. More than 11 years

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POLL

What size HCV program do you represent?

- A. Small – less than 500 total units
- B. Medium – between 501 and 5,000 total units
- C. Large – more than 5,000 total units
- D. I am not affiliated with a housing authority

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POLL

Why is this training important to you?

- A. It was requested I take this course
- B. In order to become NAHRO Certified
- C. Career growth
- D. I need a “brush up” on this information

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TERMINATIONS OF ASSISTANCE & HAP CONTRACTS

It's essential that:

- Families comply with obligations and lease
- Owners comply with HAP Contracts

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HAP CONTRACT PURPOSE

- Contract between landlord/owner and the PHA providing assistance for the family
- Only applies to the household and contract unit specified in the HAP contract
- PHA will make payments in accordance with the HAP
- Family will reside in the contract unit

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TERMINATION OF TENANCY BY THE FAMILY

- Can terminate after the initial lease term
- Terminate during the lease term with mutual consent of the owner and release from the lease
- Gives notice in accordance with lease
 - Gives the PHA a copy of the notice
- Family notifies PHA of desire to locate into another unit or terminate from the program

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TERMINATION OF TENANCY BY THE OWNER

- Can only terminate in accordance with lease and HUD requirements
- Owner can terminate for the following
 - Serious or repeated violations of the lease
 - Violations of laws that relate to occupancy or use of the unit
 - Criminal activity or alcohol abuse
 - Other good cause

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TERMINATION OF TENANCY BY THE OWNER - CONTINUED

- Owner may not terminate if PHA fails to pay HAP or pays HAP late
 - Not a violation of the lease
- During the initial phase, owner cannot terminate for "other good cause" unless the owner is terminating because of family's action
 - Failure to accept the offer of new lease or revision
 - Owner's desire to use unit for another purpose
 - Business or economic reason for termination

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TERMINATION OF TENANCY BY THE OWNER - CONTINUED

- Terminate for criminal, drug or alcohol abuse
 - Applies to family, guest, or other person under control of family
- Types of activity
 - Criminal activity that threatens health, safety and peaceful enjoyment of residents, property management staff, and people residing in the immediate vicinity
 - Violent criminal activity
 - Drug-related criminal activity
 - Abuse of alcohol
 - Fleeing to avoid prosecution, custody, or confinement
 - Violation of probation

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TERMINATION OF TENANCY BY THE OWNER - CONTINUED

- Owner can terminate, regardless of arrest or conviction
- Owner cannot terminate the lease and PHA cannot terminate the HAP for **victims** of domestic violence (VAWA)

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TERMINATION OF TENANCY BY THE OWNER - CONTINUED

- After the initial term, good cause includes:
 - Family not accepting an offer of new lease or revisions
 - Owner desires to use the unit for personal or other use
 - Business or economic reasons, such as the sale, renovation, or request for a higher rent
- Notification requirements
 - Must notify family in writing
 - Must give reasons

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HAP CONTRACT TERMINATIONS

Automatic terminations

- The family moves out of the unit
- The PHA terminates program assistance for the family
- The owner or family terminates the lease
- The owner evicts the family
- 180 days elapses since the last HAP to the owner
- If HAP terminates for any reason- lease terminates

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HAP CONTRACT TERMINATIONS - CONTINUED

180 calendar days since last payment of HAP

- Family is not eligible if at some other later time they have a loss of income
- Not eligible for a hearing if 180 days have elapsed
 - Should have requested hearing within 180 days if they are disputing the PHA's decision
- Exception to above 180 days may apply to HCV Homeownership family if contained in Policies
- Exception- RAD PBV

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HAP CONTRACT TERMINATIONS - CONTINUED

- PHA must make HAPs to the owner as long as tenant remains a program participant in the unit, even if owner has started the eviction process
- PHA continues to make payment until the family moves or court judgment allows owner to evict

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PHA TERMINATIONS OF HAP

- **Can terminate HAP if**
 - Determines unit does not meet HQS space requirements
 - Family breaks up; unless PHA decides to continue assistance to residuals that remain in this unit
 - Fails to meet HQS
 - Owner has breached the HAP
 - Insufficient funds to continue assistance

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PHA TERMINATIONS OF HAP - CONTINUED

PHA determines that owner has breached HAP

- Drug trafficking
- Violent criminal activity
- Fraud
- Bribery
- Criminal activity in connection with program
- Violations under the HAP
- Failure to comply with mortgage insurance or other program requirements in connection to HUD mortgage/loan program

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HAP CONDITIONS FOR MAINTENANCE, UTILITIES, & OTHER SERVICES

- Owner must maintain in accordance to HQS
- Owner must supply designated utilities
- Owner fails to maintain, PHA exercises remedies
 - Recovery of overpayments
 - Abatement of reduction of assistance
 - Termination of HAP
 - Termination of HAP contract
- PHA cannot exercise HQS penalty on owner as a result of participant's damage to unit

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HAP CONDITIONS FOR MAINTENANCE, UTILITIES, & OTHER SERVICES

- PHA shall not make HAP payments unless owner corrects deficiency within period specified by PHA and PHA verifies correction
 - If life threatening- 24 hours
 - Other defects- set by the PHA
- PHA inspects unit
- PHA must notify owner of deficiencies
- Owner must supply services as specified in lease

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PHA TERMINATIONS OF HAP - CONTINUED

- If PHA terminates, then PHA must give written notice
 - Specify reasons
 - Effective date of termination
- Once HAP is terminated, no other HAP payments made on the unit for the family

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PHA TERMINATION OF ASSISTANCE FOR FAMILY

PHA terminates family assistance if:

- Any member fails to sign and submit consent forms as part of reexamination
- Any family member fails to declare citizenship or provide documentation
- The family was evicted for serious or repeated violation of program
- Is an ineligible student

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PHA TERMINATION OF ASSISTANCE - CONTINUED

Violation of any family obligations

- Any member commits fraud, bribery, or criminal act related to the program
- Family currently owes money to PHA in connection with the program or PH program
- Family has not reimbursed PHA for monies paid under HAP for damages or other amounts owed under the lease
- Family is in breach of repayment agreement

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PHA TERMINATION OF ASSISTANCE - CONTINUED

Family violates the PHA policy on absence from the unit

- Administrative Plan must include a policy limiting the number of consecutive days a family may be absent up to a maximum of 180 days
- Family must provide information relating to absence
- Any family member has been evicted from federally assisted housing in the last 5 years

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PHA TERMINATION OF ASSISTANCE - CONTINUED

- PHA terminated assistance under the program for any family member
- Family has engaged in, threatened abuse, or threatened violent behavior to PHA personnel
- FSS family failed to comply with contract without good cause- provisions contained in the Action Plan
- Welfare to Work family willfully and persistently fails to comply with obligations under the program

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PHA TERMINATION OF ASSISTANCE - CONTINUED

Terminating for criminal activity

- Immediate termination for conviction of manufacturing methamphetamine on the premises of federally assisted housing
- Fleeing to avoid prosecution, custody, or confinement after conviction for a crime or attempt to commit a crime that is a felony
- Violation of parole or probation

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PHA TERMINATION OF ASSISTANCE - CONTINUED

- Abuse of alcohol that threatens the health, safety, or right of peaceful enjoyment
- Criminal acts do not require conviction, but only a preponderance of evidence
- PHA must provide the family an opportunity to review information and dispute the accuracy and relevance before the PHA informal hearing

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DOMESTIC VIOLENCE PROVISIONS

- A victim of domestic violence, dating violence, sexual assault, or stalking shall not be considered just cause for termination of assistance
- PHA can divide the parties and terminate assistance for the person violating the law
- PHA, owner, or manager must comply with court order regarding rights of access or control
- Nothing limits the owner/manager from eviction if they can demonstrate an actual or imminent threat

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NOTIFICATION REQUIREMENTS

- PHA must give both the owner and family a written notice of termination that states:
 - Reason for termination
 - Effective date of termination
 - Family's right to request a hearing
- Additional termination requirements for eligible immigration status
- Tenant's termination automatically terminates HAP
 - However, tenant can remain in the unit and not be assisted

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PARTICIPANT RIGHTS TO INFORMAL REVIEWS & HEARINGS IF DENIED OR TERMINATED


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INFORMAL REVIEWS & HEARINGS

The purpose of the informal review or hearing is to resolve disputes with applicants or participants

- Without legal action
- Correct PHA errors that have occurred in the decision process



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INFORMAL REVIEWS & HEARINGS - CONTINUED

Informal Review

- Program Applicants
- Exception is for non-citizen applicant,
 - Entitled to an informal hearing

Both processes have restrictions on items that will be reviewed or heard

Informal Hearing

- Program participants

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NOTICE OF RIGHTS

- Certain actions require offer of informal review or hearing
- PHA must give applicant or participant prompt written notice of right to request review or hearing
- Notice must contain
 - Brief statement of the reason
 - Statement that if family does not agree, they may request a hearing
 - The deadline for the family to submit a request

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NOTICE OF RIGHTS - CONTINUED

- Upon receiving request for hearing, PHA must proceed in reasonable expeditious manner
- PHA has latitude in establishing reasonable
 - Most PHAs use between 7-30 days to request a hearing and use 15 to 30 days to proceed with the action

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CIRCUMSTANCES THAT DO NOT REQUIRE AN OFFER FOR REVIEW

- Determination of unit size or compliance with HQS inspection or occupancy standards
- Denial of request to extend or suspend voucher term
- General policies & discretionary administrative determinations
- Class grievances
- Refusal to grant approval of tenancy or to extend or suspend a voucher term
- How PHA established the utility allowance schedule
- A PHA action or remedy against the owner
 - HAP has a third-party exclusionary clause

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REQUIRE HEARING FOR PARTICIPANT

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    graph LR
      A[Determination of annual income or adjusted income] --> B[Calculation of TTP]
      B --> C[Determination of appropriate utility allowance schedule]
      C --> D[Termination of assistance]
      D --> E[Termination of ineligible students]
  
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REQUIRE HEARING FOR PARTICIPANT

- Determination of unit size for subsidy standard
- Denial of hardship exemption for minimum rent
- Determination for ineligible immigration status
 - Applies both to applicant and participant
- Denial of victim of VAWA
- VASH- failure to comply with case-managers requirements

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TIMING OF INFORMAL HEARINGS

PHA can implement the following changes prior to an informal hearing:

- Change in TTP
- Change in family share
- Denial of new voucher so family can move
- Unit size determination for family that wants to move

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INFORMAL REVIEW PROCESS

- Stated in the Administrative Plan
- Contained in the briefing packet & provided to the applicant
- Person designated by PHA can conduct the hearing
 - Cannot be subordinate to the one making decision
- Applicant given opportunity to present
 - Verbally
 - Written
- PHA notifies of decision including a brief written statement of final decision

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INFORMAL HEARING PROCESS - CONTINUED

- Hearing and conduct is regulated by officer in accordance with Administrative Plan
 - Can stop/deny the process if parties cannot conduct themselves in orderly fashion

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APPROACHES FOR SELECTING & APPOINTING OFFICERS

- Appoint staff
 - Senior staff
- Civic minded individuals outside the PHA
 - Wider community
 - Must know the rules
- Hearing Panel

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HEARING PROCESS

- Family must be given opportunity to examine documents directly relevant to hearing
- Family allowed to copy at own expense
- **If family requests document and PHA does not produce, PHA cannot use the document**
 - **VAWA documents may be used during the hearing process**

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HEARING PROCESS - CONTINUED

PHA can include policy in Administrative Plan

- PHA has opportunity to review family documents prior to the hearing
- PHA can copy documents at its own cost
- If family fails to provide, family cannot use the document at the hearing

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HEARING REPRESENTATION

- **Family entitled to**
 - Spokesperson or Lawyer
 - Family must cover expense of representative

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HEARING EVIDENCE

1. PHA and family present evidence
2. PHA and family question witnesses
3. Evidence considered without regard to rules of evidence applicable to judicial proceeding
4. Person/panel reviews the evidence
 - a) Renders decision in writing
 - b) Factual determination based on "preponderance of evidence"
 - c) Copy of decision sent to the family

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PREPONDERANCE OF EVIDENCE

- **Preponderance of the evidence** is defined as greater weight of the evidence; that is, evidence that you believe because it outweighs or overbalances in your mind the evidence opposed to it.
 - A preponderance means evidence that is more probable, more persuasive, or of greater probative value. It is the quality of the evidence that must be weighed.
 - Quality may, or may not, be identical with quantity (the greater number of witnesses).

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CONSIDERATION OF EVIDENCE

- Example policy
- Oral
- Documentary
- Demonstrative
- Real
- Hearsay- generally admissible in Informal Reviews
 - Not bound by the court of law standards

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HEARING DECISION

- **PHA not bound by decisions that are:**
 - Concerning matters for which the PHA is not required to grant a hearing or matters that exceeds the authority of the person conducting the hearing
 - Contrary to HUD regulation or requirements, other federal, state or local law
 - If PHA determines they are not bound, must notify the family and inform family of the reason

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HEARING OFFICERS

- Must understand the program & the limits of their authority
- Must keep personal opinions that have no bearing on the decision, out of the decision
- Example:
 - Cannot decide to exclude income that is regulatory
 - Cannot decide that a PHA optional policy is to harsh and unfair, therefore not enforceable

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TERMINATION AND HEARING PROCESS

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PROCESS OBJECTIVES...

- The importance and focus on the Federal Requirements.
- Overview of the Housing Choice Voucher program requirements in 24 CFR 982.551-555. The family obligations & criminal activity that lead to when/why assistance should be terminated.
- Discussion regarding the usage and implementation of warnings and timelines for cure.

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PROCESS OBJECTIVES...

- Discussion and overview of how to prepare to begin termination proceedings.
- Review of the critical components needed to effectively prepare the termination letter.
- Evaluate and preparation for the Informal Hearing; and best practices for a successful outcome.

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PROCESS OBJECTIVES...

- Discussion of effective protocol and procedures for Informal Hearings.
- Preparation for the possibility of a court trial and the impact on stakeholders.
- Review the protocol necessary when Reasonable Accommodation, Fair Housing violation allegations and other unusual circumstances arise.

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FEDERAL REGULATIONS...

- There are references to responsibilities, requirements and obligations throughout the Code of Federal Regulations, 24 CFR Part 982.
- Most importantly, the regulations focus intently on denial and termination of assistance in 24 CFR 982.551 through 24 CFR 982.555.
- There are critical components in the regulations that must be adhered to.
- 24 CFR 982.552 outlines areas where the agency **MUST** terminate assistance.

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FEDERAL REGULATIONS...

- It is important to note in 24 CFR 982.552 that there is a requirement that the housing agency must give the family written description of:
 - Family obligations under the program.
 - The grounds on which the PHA may deny or terminate assistance because of family action or failure to act
 - The PHA informal hearing procedures.

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FEDERAL REGULATIONS...

- Reviewing the provisions outlined in 24 CFR 982.553 reveals that the federal regulations stipulate that the housing agency must establish standards that allow the agency to terminate assistance.
- Terminating assistance for drug criminals:
 - Any household member is currently engaged in any illegal use of a drug; or
 - A pattern of illegal use of a drug by any household member interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.

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FEDERAL REGULATIONS...

- The PHA must immediately terminate assistance for a family under the program if the PHA determines that any member of the household has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.
- The PHA must establish standards that allow the PHA to terminate assistance under the program for a family if the PHA determines that any family member has violated the family's obligations under §982.551; such as not supplying information, causing HQS breaches, blocking inspections, fraud, subletting units, etc. (There are many listed in that section).

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FEDERAL REGULATIONS...

- **Terminating assistance for other criminals.** The PHA must establish standards that allow the PHA to terminate assistance under the program for a family if the PHA determines that any household member has violated the family's obligation under §982.551 not to engage in violent criminal activity.
- **Terminating assistance for alcohol abusers.** The PHA must establish standards that allow termination of assistance for a family if the PHA determines that a household member's abuse or pattern of abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

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FEDERAL REGULATIONS...

- **Evidence of criminal activity.** The PHA may terminate assistance for criminal activity by a household member as authorized in this section if the PHA determines, based on a preponderance of the evidence, that the household member has engaged in the activity, regardless of whether the household member has been arrested or convicted for such activity.
- **Termination of assistance.** If a PHA proposes to terminate assistance for criminal activity as shown by a criminal record, the PHA must notify the household of the proposed action to be based on the information and must provide the subject of the record and the tenant with a copy of the criminal record. The PHA must give the family an opportunity to dispute the accuracy and relevance of that record in accordance with §982.555.

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INFORMAL HEARING REQUIREMENT...

When a hearing is required.

- The PHA must give a participant family an opportunity for an informal hearing to consider whether the following PHA decisions relating to the individual circumstances of a participant family are in accordance with the law, HUD regulations and PHA policies.
- A determination to terminate assistance for a participant family because of the family's action or failure to act (see §982.552) – Discussed in previous slides (Family Obligations & Criminal activity).
- A determination to terminate assistance because the participant family has been absent from the assisted unit for longer than the maximum period permitted under PHA policy and HUD rules.

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INFORMAL HEARING REQUIREMENT ...

- **Expeditious hearing process.** Where a hearing for a participant family is required under this section, the PHA must proceed with the hearing in a reasonably expeditious manner upon the request of the family.
- **Hearing procedures— Administrative plan.** The administrative plan must state the PHA procedures for conducting informal hearings for participants.

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INFORMAL HEARING REQUIREMENT ...

- **Discovery by family.** The family must be given the opportunity to examine before the PHA hearing any PHA documents that are directly relevant to the hearing. The family must be allowed to copy any such document at the family's expense. If the PHA does not make the document available for examination on request of the family, the PHA may not rely on the document at the hearing.

Note: Never allow original documents to be removed from the file by anyone other than PHA staff and for very limited reasons.

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INFORMAL HEARING REQUIREMENT ...

- **Discovery by PHA.** The PHA hearing procedures may provide that the PHA must be given the opportunity to examine at PHA offices before the PHA hearing any family documents that are directly relevant to the hearing. The PHA must be allowed to copy any such document at the PHA's expense. If the family does not make the document available for examination on request of the PHA, the family may not rely on the document at the hearing.

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INFORMAL HEARING REQUIREMENT ...

- **Representation of family** - At its own expense, the family may be represented by a lawyer or other representative.
- **Hearing officer: Appointment and authority** - The hearing may be conducted by any person or persons designated by the PHA, other than a person who made or approved the decision under review or a subordinate of this person.
- The person who conducts the hearing may regulate the conduct of the hearing in accordance with the PHA hearing procedures.

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INFORMAL HEARING REQUIREMENT ...

Note: The Informal Hearing is required to be offered to the program recipient prior to terminating the housing assistance payments.

- There are other reasons that Informal Hearings are required, but not related to termination of housing assistance.
- Please note in §982.555 when hearings are NOT required.

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NOTICE REQUIREMENTS

- **Notice to family** - The PHA must notify the family that the family may ask for an explanation of the basis of the PHA determination, and that if the family does not agree with the determination, the family may request an informal hearing on the decision.
- The PHA must give the family prompt written notice that the family may request a hearing. The notice must:
 - Contain a brief statement of reasons for the decision,
 - State that if the family does not agree with the decision, the family may request an informal hearing on the decision, and
 - State the deadline for the family to request an informal hearing.

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WARNING!

- A policy that allows for families to be advised of potential violations that exist with family obligations, the home, behavior, lease issues and/or reexamination issues as a warning?
- Verbiage and language used in warning or violation letters should be carefully considered.
- Be careful to understand the fine line between advising of possible violations and harassment.
- A threatening letter could produce the reverse outcome.

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ALLOWANCE OF CURE PERIODS

- As a best practice, your agency might consider a policy that allows for:
 - Notice of a possible violation or problem that has been identified.
 - Notice that this should be corrected and possible methods, services, agencies or resources that could assist.
 - Notice that failure to correct this issue may lead to a more severe program violation and possible termination of benefits.
 - A cure period of when the PHA will review the issue or problem in the future to ascertain correction.

Note: This policy should be clear, concise and used consistently.

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PREPARING THE TERMINATION LETTER...

- It is important not to rush through this process and ensure that the letter is correct and follows the federal regulation requirements.
- The PHA should have an approved letter template that has been reviewed and approved by legal counsel.
- The template should be reviewed periodically to insure it remains compliant with changing regulations.
- The most critical section of the termination letter should be the section that explains the Informal Hearing process.

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PREPARING THE TERMINATION LETTER...

- The regulations state there must be a description of the violation(s) that have occurred. **Please make certain that these violations are supported by documents or clear testimony.**
- The regulations state that the PHA must supply an explanation for the basis for their decision. This has much importance:
 - What is the violation/issue/problem?
 - What does it violate? Cite the regulations violated.
 - If multiple regulations are violated, cite all of them.
 - Attach copies of any document you are citing, i.e. Police reports, letters, etc.

Note: The family must be able to refute your evidence during their hearing.

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PREPARING FOR THE INFORMAL HEARING...

- First and foremost, is this case viable? Are there any issues, items, documents, or situations that might be overlooked or overanalyzed that could alter the outcome of this case?
- Are there issues with Reasonable Accommodation, physical or mental health issues that have caused this situation and the agency can remedy the problem?
- Are you or the agency overreacting to a minor infraction?

Example: Recipient who is behind on utility payments.

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PREPARING FOR THE INFORMAL HEARING...

- Does your policy support the action you are taking? Make certain you can quote from the Administrative Plan or Standard Operating Procedures.
- **Remember – the Federal Regulations have very few MUSTS, the PHA must establish standards in its policies.**
- Would you consider “testing the water” on this termination before making a final decision? Ask a co-worker to play devils advocate?
- Remember, you are dramatically impacting the livelihood of a family.

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PREPARING FOR THE INFORMAL HEARING...

- Always ensure that all documentation is in order and ready to be presented! It may be prudent to create a new file that is organized ONLY for the Informal Hearing.
- Do you have everything required? For example, police reports, letters from owners, correct lease, most updated forms, etc.
- Are you well prepared for this hearing? Are there any areas you are not clear on the information?
- Have your Administrative Plan and Operating Procedures with you during the hearing.

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PREPARING FOR THE INFORMAL HEARING...

- Remember that the Hearing Officer has to render a decision based upon what is presented, and is an impartial stakeholder in this process.
- A Hearing Officer may or may not be as educated or knowledgeable as you regarding the regulations and policies. You should be prepared to educate them and not leave the hearing officer to "figure it out".
- The Hearing Officer's duty is to render a decision based upon the arguments and facts presented.

Note: Hearing Officer's are human, and you must be prepared for a decision you do not agree with. However, you must honor the process.

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WHAT IF THERE IS A TRIAL?

- Please note that a program family has the option to file against the agency in court if they so choose.
- You should prepare each termination case as if this possibility exists.
- It will be critical that you review all documents and be prepared to defend the case with a judge; which is different than a Hearing Officer.
- Legal Counsel should be consulted immediately when you are made aware of a court filing.

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WHAT IF THERE IS A TRIAL?

- You may need to notify your insurance carrier, please check on this possibility or requirement.
- Be prepared to be a witness in court – you should meet with Legal Counsel to be best prepared for this situation.
- Go to trial with documents well prepared, have several copies of all documents available.
- If you are nervous about a trial, that is normal. The better prepared you are, the more confident you will be.

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REASONABLE ACCOMMODATION

- Always be certain that a client is not asking for a reasonable accommodation (in cases where there exists a disability).
- Reasonable Accommodation can be more than just physical modifications; it may be an accommodation of a policy, procedure, payment standard, unit size, etc.
- Many agencies believe it is a best practice to ask directly if a reasonable accommodation is needed for any reason.
- This issue can often arise far along in the process and can become a very problematic issue for all parties.

Note: Do not assume that you always know when a client has a disability!

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FAIR HOUSING ISSUES

- You (and your agency staff) should be well versed on Fair Housing requirements and related issues.
- It is imperative that staff follow policies strictly and consistently, especially in during termination of benefits.
- It is very important that staff realize that problems such as bias, stereotyping, discrimination and personal opinion can lead to claims of violation of fair housing requirements.

Note: It is quite common for staff to become very emotionally connected to a case or have a strong opinion. You should be cautioned against this!

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SUMMARY...

- The voucher termination process is quite prescriptive, but the regulations do require the agency to establish standards.
- Staff should be clear on the termination reasons and protocol, most importantly regarding the termination letter and the informal hearing.
- Preparation of the letter should not be rushed.
- Preparation for the informal hearing requires review of policies, regulations and the reasons/incidents leading to the termination.
- Be extremely organized and confident for the hearing.

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SUMMARY...

- Understand the Hearing Officer needs to understand your argument and the supporting rules/regulations/policies.
- Understand that a program family can render this to court.
- Arguing this termination in court is very different than a hearing.
- Be prepared to work with a reasonable accommodation.
- Be cautious about Fair Housing rules and possible violations.

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THANK YOU!

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