

Streamlined Annual PHA Plan <i>(HCV Only PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
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Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families

Applicability. The Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS and SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A.	PHA Information.															
A.1	<p> PHA Name: <u>City of Santa Rosa Housing Authority</u> PHA Code: <u>CA088</u> PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>07/2025</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Housing Choice Vouchers (HCVs) <u>1925</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. </p> <p> The 2025-2026 Annual PHA Plan will be available for review and comment at the City of Santa Rosa Housing Authority (SRHA) offices located at 90 Santa Rosa Avenue, Santa Rosa, CA from 9:00am to 4:00pm Monday – Thursday and 9:00am to 3:00pm beginning Friday, February 14, 2025, through March 31, 2025, during the Public Comment period. The Annual PHA Plan will also be available on the Housing Authority’s website at www.srcity.org/section8 and electronic comments may be submitted to section8@srcity.org. </p> <p> A Public Hearing to present and review the 2025-2026 Annual PHA Plan will be held on Monday, March 24 at the regular meeting of the City of Santa Rosa Housing Authority Board of Commissioners. The meeting will be held at City Council chambers at 100 Santa Rosa Avenue, Santa Rosa, California beginning at 1:30 P.M. </p> <p> <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below) </p> <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th style="width: 25%;">Participating PHAs</th> <th style="width: 10%;">PHA Code</th> <th style="width: 25%;">Program(s) in the Consortia</th> <th style="width: 25%;">Program(s) not in the Consortia</th> <th style="width: 15%;">No. of Units in Each Program</th> </tr> </thead> <tbody> <tr> <td>Lead HA:</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td> </td> <td> </td> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program	Lead HA:									
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B.	Plan Elements.
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Informal Review and Hearing Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Significant Amendment/Modification.</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element(s):</p> <p>During the Annual Plan process for FY 2024-2025, SRHA published its HOTMA-compliant policies within the Administrative Plan in anticipation of adopting HOTMA during FY 2024-2025. Adoption of HOTMA requires the concurrent transition to the Department of Housing and Urban Development (HUD) Housing Information Portal (HIP) data system for reporting Family Records on the HUD-50058 form; this system is not yet in operation, therefore, the full HOTMA transition has not occurred, and the revised HOTMA-compliant Administrative Plan presented in the FY 2024-2025 Annual PHA Plan has not been adopted. In PIH Notice 2024-38, HUD summarized the HOTMA compliance requirements that are already in effect and those changes that are required by July 1, 2025. These changes are not considered revisions of the PHA Plan Elements, however, SRHA has provided a summary of its compliance with the PIH Notice 2024-38 requirements in this Annual PHA Plan labeled as Attachment 1.</p> <p>SRHA adopted the National Standards for the Physical Inspection of Real Estate (NSPIRE) standards effective July 1, 2024.</p>
B.2	New Activities. – Not Applicable – This section refers to new capital activities which is not applicable to HCV-Only PHAs.

<p>B.3</p>	<p>Progress Report.</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in its 5-Year PHA Plan.</p> <p>Goal: Increase supply of affordable rental housing for the City of Santa Rosa's lowest-income households.</p> <ul style="list-style-type: none"> • SRHA applied for 10 additional HUD-VASH Vouchers made available in 2024. • SRHA requested a review of HUD’s Fair Market Rent determination for the Santa Rosa Metropolitan Statistical Area with the intention of making more rental units affordable to voucher holders with higher Payment Standards in future Fiscal Years, provided the appropriate HUD budget to support them. <p>Goal: Provide housing and services to special needs populations.</p> <ul style="list-style-type: none"> • SRHA extended the PBV contract for the Rosenberg building, a 76-unit building for seniors and people with disabilities, through the year 2044. • SRHA brought 13 PBV units dedicated for seniors into service in February 2024 in the Laurel at Perennial Park Phase II project. <p>Goal: Increase readiness for homeownership for City of Santa Rosa residents.</p> <ul style="list-style-type: none"> • SRHA has 40 active participants in its Family Self-Sufficiency (FSS) program with a combined total of over \$286,400.00 in FSS escrow funds which can be used upon graduation from the FSS program for downpayment on home purchases. <p>Goal: Preserve existing affordable housing stock.</p> <ul style="list-style-type: none"> • SRHA is maintaining three PBV contracts at Bethlehem Tower, Rosenberg and Parkwood Apartments which were executed on existing housing to preserve the affordability of those buildings. • Since the beginning of the current Fiscal Year, 174 rental units with habitability issues were brought back into compliance with housing quality standards through routine housing inspections. <p>Goal: Support City of Santa Rosa efforts to reduce homelessness</p> <ul style="list-style-type: none"> • SRHA maximized its utilization of the Emergency Housing Voucher (EHV) program for people experiencing homelessness before the initial program sunset date of September 30, 2023, and is currently maintaining 117 vouchers using EHVs. • SRHA has a Limited Preference on its HCV waiting list for households referred to the program Sonoma County Coordinated Entry under policies established through the Sonoma County Continuum of Care for homeless services. These vouchers are currently fully utilized. • Since the publication of the last Annual PHA Plan, SRHA has entered a PBV HAP Contract for an additional 30 PBV units at South Park Commons dedicated to people experiencing homelessness and will add another 33 units in the current Fiscal Year at the Cannery at Railroad Square. There will be a total of 101 homeless-dedicated PBV units in service by the end of FY 2024-2025. <p>Goal: Utilize the resources of the Housing Choice Voucher program strategically and in cooperation with other local funding sources to maximize efficiency and produce additional affordable housing</p> <ul style="list-style-type: none"> • SRHA continues to utilize its PBV resources to leverage the development of additional affordable units. Across 15 project sites, SRHA has 330 PBV units that helped bring a total of 581 new units to the affordable housing market. In addition, an Agreement to Enter into a Housing Assistance Payments (AHAP) Contract has been executed for 8 units at Del Nido Apartments which will help leverage the rehabilitation of the entire property.
<p>B.4</p>	<p>Capital Improvements. – This section refers to PHAs that receive funding from the Capital Fund Program (CFP) which is not applicable for HCV-Only PHAs.</p>
<p>B.5</p>	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N N/A <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p> <p>Three exceptions were noted during testing of 40 HQS inspection reports randomly selected from the total number of HQS inspections completed in the Fiscal Year ending June 30, 2023. The exceptions were related to lack of documentation of repairs on paper inspection memo reports that are written in the field and used to track inspection outcomes. To address the findings, SRHA implemented an electronic inspection reporting and tracking system including electronic signatures, automatic transmittal of failed inspection reports to supervisors for review, and a comprehensive real-time report of all pending repairs.</p>

C.	Other Document and/or Certification Requirements.
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>Any RAB Comments will be added to this section after the RAB convenes for the FY 2025-2026 Annual PHA Plan review.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.</p>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>The certification will be submitted with the final report. The City of Santa Rosa Consolidated Plan is available for review at https://www.srcity.org/767/Reports-and-Resources.</p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p> <p>The certification will be submitted with the final report.</p>
C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>Any Challenged Elements discussion will be added to this section after the public comment period has ended on March 31, 2025.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N <input type="checkbox"/> <input type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
D.	Affirmatively Furthering Fair Housing (AFFH).
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015.</p> <p>SRHA is providing an excerpt from the Regional Fair Housing Plan as reference for this section.</p>

Fair Housing Goal:

Describe fair housing strategies and actions to achieve the goal

The City of Santa Rosa, as an entitlement jurisdiction, participated in a regional planning process and has released the 2024 Fair Housing Plan draft. The Regional Fair Housing Plan follows the template for the Assessment of Fair Housing that was created by the U.S. Department of Housing and Urban Development's 2015 Affirmatively Furthering Fair Housing rule. The following is a summary excerpt from the Draft 2024 Fair Housing Plan for the City of Santa Rosa. The full document is available on the City of Santa Rosa's website at <https://www.srcity.org/767/Reports-and-Resources>.

"The Napa/Sonoma Regional Fair Housing Plan was a planning process for local governments and Public Housing Agencies to help jurisdictions meet their fair housing requirements in a meaningful way and take actions necessary to overcome historic and current patterns of segregation, promote fair housing choice, and foster more inclusive communities. The regional approach undertaken helps to ensure that the goals are applied consistently and collaboratively across the region and fosters a more inclusive community for everyone that calls the area home.

The City of Santa Rosa's 2015-2019 American Community Survey data shows that approximately 54.6% of residents are White, non-Hispanic, 32.8% are Hispanic or Latino, 5.9% of residents are Asian Americans or Pacific Islanders, 2.4% of residents were non-Hispanic Black, and 0.7% of residents were non-Hispanic Native Americans, and 3.5% are multiple races. Over time, Santa Rosa has become more diverse, regarding the white and Hispanic populations. Additionally, the percentage of seniors has grown to 19% of the population and seniors are likely to become a larger part of the City's population in coming years due to the aging of the baby boomer generation.

In consultation with stakeholders, research, and data analysis, the City of Santa Rosa (City) has identified the following contributing factors as to segregation, lack of access to opportunities, and lack of fair housing: Access to proficient schools by students with disabilities; Access to financial services; Access to publicly supporting housing by persons with disabilities; Access to transportation systems for persons with disabilities; Admissions and occupancy policies and procedures, including preferences in publicly supported housing; Availability of affordable, accessible housing units in a range of sizes; Availability, type, frequency, and reliability of public transportation; Community opposition to housing projects for lower income households; Deteriorated and abandoned properties; Displacement of and or lack of housing support for victims of domestic violence, dating violence, stalking, and sexual assault; Displacement of residents due to economic factors; Impediments to housing mobility; Inaccessible government facilities or services; Inaccessible public or private infrastructure; Lack of access to opportunity due to high housing costs; Lack of affordable in-home or community-based supportive services; Lack of affordable, integrated housing for people who need supportive services; Lack of assistance for housing accessibility modifications; Lack of assistance for transitioning from institutional settings to integrated housing; Lack of community revitalization strategies; Lack of local private fair housing outreach and enforcement; Lack of local public fair housing outreach and enforcement; Lack of meaningful language access for individuals with limited English proficiency; Lack of private investment in specific neighborhoods; Lack of public investment in specific neighborhoods; Lack of regional and local cooperation; Lack of resources for fair housing agencies and organizations; Lack of state or local fair housing laws; Land use and zoning laws; Lending discrimination; Location and type of affordable housing; Location of accessible housing; Location of employers; Location of environmental hazards; Location of proficient schools and school assignment policies; Loss of affordable housing; Occupancy codes and restrictions; Private discrimination; Quality of affordable housing information programs; Regulatory barriers to providing housing and supportive services for persons with disabilities; Siting, selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs; Source of income discrimination; State or local laws, policies or practices that discourage individuals with disabilities from living in apartments, family homes, supportive housing, and other integrated settings; and, Unresolved violations of fair housing or civil rights laws in apartments, family homes, supportive housing, and other integrated settings.

To address the contributing factors described above, this assessment proposes the following goals and strategies, which are detailed in the 2024 Fair Housing Plan Draft, Section V:

1. Increase the supply of affordable housing in higher opportunity areas and areas with ongoing or threatened displacement.

- a. Promote affordable housing bond issues at multiple levels of government.
- b. Adopt or modernize inclusionary housing and commercial linkage fee ordinances.
- c. Provide low-interest loans to single-family homeowners and grants to homeowners with household incomes of up to 100% AMI to develop accessory dwelling units (ADUs) with affordability restrictions on their property.
- d. Prioritize publicly owned land and reduce permit fees for affordable housing.

2. Meet the housing and services needs of migrant and year-round farmworkers.

- a. Reform zoning and land use laws to permit safe farmworker housing in areas where agricultural uses predominate.
- b. Target through affirmative marketing farmworkers for affordable housing opportunities in towns and cities and provide local support for developments seeking funding for farmworker housing.

3. Reduce zoning and land use barriers to the development of housing that is affordable to low-income households, including low-income people of color and low-income persons with disabilities.

- a. Create affordable housing overlay districts to enable multifamily housing with a significant affordable component in higher opportunity areas.
- b. For qualifying jurisdictions, as per California Senate Bill 10, adopt an ordinance to allow up to ten dwelling units on any parcel that is within a transit-rich area or urban infill site.
- c. Update the zoning codes across the region to reflect recent changes to California laws that are designed to increase affordable housing.

4. Increase access to opportunity for Housing Choice Voucher households.

- a. Advocate for housing authorities to adopt small area fair market rents or exception payment standards for regional sub-markets.
- b. Engage municipal attorneys in enforcing prohibitions against source of income discrimination.

- 5. Prevent displacement by preserving affordable housing and protecting tenants' rights.
 - a. Expand funding for tenants in landlord-tenant proceedings.
 - b. Track the viability of rent stabilization for mobile home parks.
 - c. Track and collaborate to preserve affordable housing developments with expiring subsidy contracts countywide.
 - d. Evaluate a right of first refusal for manufactured home park residents to purchase their communities when owners seek to sell or redevelop their properties.

6. Reduce homelessness by expanding the supply of Permanent Supportive Housing

- a. Prioritize HOME and CDBG Funds for developments that include Permanent Supportive Housing units.
- b. Advocate for Public Housing Authorities to Adopt Preferences in their Housing Choice Voucher Program for Individuals with Disabilities Who Are Institutionalized or at Risk of Institutionalization.

7. Increase Support for Fair Housing Enforcement, Education, and Outreach.

- a. Revise the definition of "family" in the Santa Rosa City Code to avoid violating the Fair Housing Act.
- b. Prioritize funding for the creation of affordable, multi-family housing for low-income households.

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Mandatory HOTMA Provisions Implemented by SRHA	
Implementation Date	HOTMA Requirement
December 31, 2023	Stop enrollments into the Earned Income Disallowance which is being eliminated under HOTMA.
January 1, 2025	Begin using the new HUD-9886 Form for families. This is the authorization form that families sign to allow Housing Authorities to verify their income information.
July 1, 2025	<p>New and revised income exclusions to be implemented. These will be further described in the SRHA Administrative Plan, but will include:</p> <ul style="list-style-type: none"> • Nonrecurring Income (24 CFR 5.609(b)(24)) • Lump-Sum Additions to Net Family Assets (24 CFR 5.609(b)(24)(vii)) • Income Earned on Amounts Placed in a Family's Family Self Sufficiency (FSS) Account (24 CFR 5.609(b)(27)) • Income of Live-in Aides, Foster Children, and Foster Adults (24 CFR 5.609(b)(8)) • Payments Received for the Care of Foster Children or Foster Adults or State or Tribal Kinship or Guardianship Care Payments (24 CFR 5.609(b)(4)) • Insurance Payments or Settlements (24 CFR 5.609(b)(5)) • Civil Action Recoveries or Settlements (24 CFR 5.609(b)(7)) • Earned Income of Dependent Full-Time Students (24 CFR 5.609(b)(14)) • Adoption Assistance Payments (24 CFR 5.609(b)(15)) • Veterans Regular Aid and Attendance (24 CFR 5.609(b)(17)) • Home-Based Care Payments for a Family Member(s) with one or more Disabilities (24 CFR 5.609(b)(19)) • Loan Proceeds (24 CFR 5.609(b)(20)) • Certain Payments Received by Tribal Members (24 CFR 5.609(b)(21)) • Exclusions from Other Federal Statutes (24 CFR 5.609(b)(22)) • Replacement Housing Gap Payments (24 CFR 5.609(b)(23)) • Student Financial Assistance (24 CFR 5.609(b)(9)) • Achieving a Better Life Experience (ABLE) Accounts (24 CFR 5.609(b)(22)) • Income and Distributions from Coverdell Education Savings Accounts, 529 Accounts, and "Baby Bond" Accounts (24 CFR 5.609(b)(10)) • Gross Income from Self-Employment or Operation of a Business (24 CFR 5.609(b)(24) and 5.609(b)(28)) • Civil Rights Settlements or Judgments (24 CFR 5.609(b)(25)) • Certain distributions of irrevocable trusts or revocable trusts outside the control of the family or household (including most Special Needs Trusts) (24 CFR 5.609(b)(2))

<p>July 1, 2025</p>	<p>New and revised definitions used in the Housing Choice Voucher and related programs. These will be further defined in the SRHA Administrative Plan and include:</p> <ul style="list-style-type: none"> • “Earned income” and “unearned income” (24 CFR 5.100). Please refer to Notice PIH 2023-27, Attachment F, Sections F.2 and F.3 for guidance on these definitions. • “Family” (24 CFR 5.403). Please refer to Notice PIH 2023-27, Attachment E, Section E.1 for guidance on the definition of family. • “Day laborer,” “independent contractor,” and “seasonal worker” (24 CFR 5.603). Please refer to Notice PIH 2023-27, Attachment F, Sections F.2.a, F.2.b, and F.2.c for guidance on these definitions. • “Dependent” (24 CFR 5.603). Please refer to Notice PIH 2023-27, Attachment E, Section E.2 for guidance on the revision to this definition. • “Foster child” and “foster adult” (24 CFR 5.603). Please refer to Notice PIH 2023-27, Attachment E, Section E.2 for guidance on these definitions. Note: The definitions of “foster child” and “foster adult” were added to 24 CFR 982.4 as part of a final rule published on May 7, 2024 (“Housing Opportunity Through Modernization Act of 2016-Housing Choice Voucher (HCV) and Project-Based Voucher Implementation; Additional Streamlining Changes,” 89 FR 38224), and this rule did not have a delayed compliance date.⁷ For the Housing Choice Voucher program [including Project-Based Vouchers], PHAs must already be implementing the definition of “foster child” and “foster adult”. • “Health and medical care expenses” (24 CFR 5.603). Please refer to Notice PIH 2023-27, Attachment C, Section C.3.b for guidance on this definition. • “Minor” (24 CFR 5.603).
<p>July 1, 2025</p>	<p>De Minimis Errors: Beginning July 1, 2025, an error in calculating family income by no more than \$30 per month in monthly adjusted income is considered a “de minimis error” and Housing Authorities will not be considered out of compliance as a result of de minimis errors under this new threshold. Housing Authorities must still correct errors and credit families if the error resulted in an overpayment by the family.</p>