**Chapter 5**

**OCCUPANCY STANDARDS AND UNIT OFFERS**

**INTRODUCTION**

The PHA must establish policies governing occupancy of dwelling units and offering dwelling units to qualified families.

This chapter contains policies for assigning unit size and making unit offers. The PHA’s waiting list and selection policies are contained in Chapter 4. Together, Chapters 4 and 5 of the ACOP comprise the PHA’s Tenant Selection and Assignment Plan (TSAP).

Policies in this chapter are organized in two parts.

Part I: Occupancy Standards. This part contains the PHA’s standards for determining the appropriate unit size for families of different sizes, compositions, and types.

Part II: Unit Offers. This part contains the PHA’s policies for making unit offers and describes actions to be taken when unit offers are refused.

**PART I: OCCUPANCY STANDARDS**

**5-I.A. OVERVIEW**

This section provides an overview of Part I. **No policy decisions are required**.

**5-I.B. DETERMINING UNIT SIZE**

**☑ Decision Point: Will the PHA establish separate occupancy standards for individual developments? (Model ACOP, p. 5-2)**

Things to Consider

* Many older public housing developments contain small units with small bedrooms, but some newer units are much larger. For PHAs with a mix of smaller and larger units it is sensible to use occupancy standards that reflect the actual size and layout of the units, rather that simply pegging occupancy levels to number of bedrooms [PH Occ GB, p. 62].
* Lower occupancy standards could be used to control density at individual sites, and to reduce the demand on building systems.
* Lower occupancy standards could also be used as an incentive for deconcentration of a development, or to encourage leasing of hard-to-rent units.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

The PHA will use the same occupancy standards for each of its developments.

🞎 *Option 2: Delete the model ACOP language and insert the language below.*

The PHA has established occupancy standards for individual developments as specified below:

***[List developments or groups of developments with corresponding occupancy standards.]***

* *Option3: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**☑ Decision Point: How will the PHA determine the appropriate unit size for families? (Model ACOP, p. 5-2)**

Things to Consider

* The PHA must be careful that its occupancy policies do not violate the prohibition on discrimination on the basis of familial status (Fair Housing Act Amendments, 1988). Under this law, the PHA may limit the number of persons who may occupy a dwelling unit, but may not impose different limits based on the presence of children. For example, if the PHA permits occupancy of a 1-bedroom unit by a married couple, it is unlawful to refuse to rent that unit to a parent with a child.
* HUD regulations do not specify the number of persons who may live in public housing units of various sizes. However, HUD published a Notice of Statement of Policy on December 18, 1998. The notice states in part that, “… an occupancy policy of two persons in a bedroom, as a general rule, is reasonable under the Fair Housing Act” [PH Occ GB, p. 62].
* The Statement also suggests that PHAs are permitted to consider the following issues in establishing their own occupancy standards:
* Applicable state or local housing or occupancy codes (if any)
* Size and configuration of the PHA’s housing units
* Limitations imposed by the capacity of water and sewer systems
* Site density issues
* Characteristics of individual families
* Avoiding both under-utilizing space and overcrowding families
* The ACOP must state the PHA’s policy on the minimum and maximum number of persons who may live in units. The model policy addresses this issue considering each of the elements specified in reference to those outlined in the Public Housing Occupancy Guidebook, including the list of principles for PHA policy on occupancy standards [PH Occ GB, p. 63].
* PHAs must ensure that the maximum number of persons for each size unit does not exceed local housing and occupancy codes. The model policy may need to be edited to comply with local codes in your jurisdiction.
* PHAs may allocate bedrooms based on the ages and relationships of family members. However, the PHA may not determine which family members will actually share a bedroom.
* The equal access final rule prohibits discrimination on the basis of sexual preference, gender identity, and marital status. It also prohibits PHAs from inquiring as to the sexual preference or gender identity of applicants and residents. This creates difficulty in determining the appropriate bedroom size for families that include unrelated adults.
* The default policy states that the PHA will allocate one bedroom for every two persons with certain exceptions. The PHA should ensure that inquiries for the purpose of allocating bedrooms do not violate the civil rights of applicants or residents.
* The Public Housing Occupancy Guidebook states that an unborn child will not be counted as a person in determining unit size, but that a single pregnant woman may be assigned to a 1-bedroom unit. The default policy opts to assign single pregnant women to a 1-bedroom unit to eliminate the need for a transfer after the child is born, which aligns with the “two persons per bedroom” aspect of the policy. However, the PHA will still need to consider the length of time before the family is eligible to transfer to a 2-bedroom unit to avoid two persons of differing generations residing in the same bedroom. As such, the default policy requires the PHA to enter the number of years (e.g., two years) after which the family will be eligible for a transfer, and cannot be adopted as-is.
* Under the same reasoning and to promote consistency, the model ACOP provides that a single parent with one child will also be assigned to a one-bedroom unit, assuming no other changes in family composition, until the child reaches a specified age. Under this policy, the family will be eligible to request a transfer to a 2-bedroom unit after the child reaches that age.
* In addition to the default policies listed in the model ACOP, some PHAs allocate separate bedrooms for children of the same sex with an age difference of a specified number of years (e.g., five years), or for unrelated adults of the same sex (see Option 3).

**CAUTION:** **You must insert information here. The model ACOP does not contain language that can be adopted as-is.**

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

The PHA’s occupancy standards are as follows:

The PHA will assign one bedroom for each two persons within the household, except in the following circumstances:

Persons of different generations will not be required to share a bedroom, except:

A single pregnant woman with no other household members and a single parent with one child and no other household members will be assigned a one-bedroom unit. Assuming no other changes in family composition, after the child reaches the age of **[number of]** years, the family will be eligible for a transfer to a 2-bedroom unit.

Otherwise, an unborn child will not be counted as a person in determining unit size.

Live-in aides will be allocated a separate bedroom. No additional bedrooms will be provided for the live-in aide’s family.

Single person families will be allocated a zero or one bedroom.

Children related to a household member by birth, adoption, or court awarded custody will be considered when determining unit size.

Foster children will be considered when determining unit size. The family may add foster children to the household as long as it does not overcrowd the unit based on the PHA’s occupancy standards.

Children away at school, but for whom the unit is considered the primary residence, and children temporarily placed outside the home, will be considered when determining unit size.

Children in the process of being adopted will be considered when determining unit size.

Children who will live in the unit less than 50 percent of the time will not be considered when determining unit size.

The PHA will reference the following standards in determining the appropriate unit bedroom size for a family:

|  |  |  |
| --- | --- | --- |
| **BEDROOM SIZE** | **MINIMUM NUMBER OF PERSONS** | **MAXIMUM NUMBER OF PERSONS** |
| 0 | 1 | 1 |
| 1 | 1 | 2 |
| 2 | 2 | 4 |
| 3 | 3 | 6 |
| 4 | 4 | 8 |
| 5 | 6 | 10 |
| 6 | 8 | 12 |

🞎 *Option 2: Delete the model ACOP language and insert the language as shown below.*

The PHA will assign one bedroom for each two persons within the household.

🞎 *Option 3:* *Select from the additional options below (Note: some options need to be completed by the PHA):*

Children of separate genders regardless of age (i.e., from birth) will be allocated separate bedrooms.

Children of the same gender with an age difference exceeding **[number of]** years will be allocated separate bedrooms.

Unrelated adults of the same gender will be allocated separate bedrooms.

Foster children will be included in determining unit size only if they will be in the unit for more than **[number of]** months.

🞎 *Option 4: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**5-I.C. EXCEPTIONS TO OCCUPANCY STANDARDS**

**Types of Exceptions**

**☑ Decision Point: How will the PHA treat requests for exceptions to the occupancy standards? (Model ACOP, p. 5‑4)**

Things to Consider

* While requests for exceptions to the occupancy standards should be considered on a case-by-case basis, the PHA must ensure that its decisions result in fair and consistent treatment of families.
* The model policy clarifies that the PHA can grant occupancy standard exceptions for larger units as well as smaller units, and gives examples of both types of requests.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

The PHA will consider granting exceptions to the occupancy standards at the family’s request if the PHA determines the exception is justified by the relationship, age, sex, health or disability of family members, or other personal circumstances.

For example, an exception may be granted if a larger bedroom size is needed for medical equipment due to its size and/or function, or as a reasonable accommodation for a person with disabilities. An exception may also be granted for a smaller bedroom size in cases where the number of household members exceeds the maximum number of persons allowed for the unit size in which the family resides (according to the chart in Section 5-I.B) and the family does not want to transfer to a larger size unit.

When evaluating exception requests the PHA will consider the size and configuration of the unit. In no case will the PHA grant an exception that is in violation of local housing or occupancy codes, regulations, or laws.

Requests from applicants to be placed on the waiting list for a unit size smaller than designated by the occupancy standards will be approved as long as the unit is not overcrowded according to local code, and the family agrees not to request a transfer for a period of two years from the date of admission, unless they have a subsequent change in family size or composition.

To prevent vacancies, the PHA may provide an applicant family with a larger unit than the occupancy standards permit. However, in these cases the family must agree to move to a suitable, smaller unit when another family qualifies for the larger unit and there is an appropriate size unit available for the family to transfer to.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**Processing of Exceptions**

**☑ Decision Point: How will the PHA process exception requests? (Model ACOP, p. 5‑4)**

Things to Consider

* Although it is a good practice for residents to submit written requests, it is important to remember that, regarding requests as a reasonable accommodation, the Joint Statement of the Departments of HUD and Justice: Reasonable Accommodation under the Fair Housing Act, issued May 17, 2004, clarified that, while it is usually helpful to both the requester and the PHA to have the request for a reasonable accommodation made in writing, the PHA must give appropriate consideration to reasonable accommodation requests even if the requester makes the request orally or does not use the PHA’s preferred forms or procedures for making such requests.
* If a person’s disability is obvious or otherwise known to the PHA, and if the need for the requested accommodation is also readily apparent or known, no further verification is required [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act]. The model policy reflects this guidance.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

All requests for exceptions to the occupancy standards must be submitted in writing, which may include email.

In the case of a request for exception as a reasonable accommodation, the PHA will encourage the resident to make the request in writing using a reasonable accommodation request form. However, the PHA will consider the exception request any time the resident indicates that an accommodation is needed whether or not a formal written request is submitted.

Requests for a larger size unit must explain the need or justification for the larger size unit and must include appropriate documentation. Requests based on health-related reasons must be verified by a knowledgeable professional source, unless the disability and the disability-related request for accommodation is readily apparent or otherwise known.

The PHA will notify the family of its decision within 10 business days of receiving the family’s request.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**PART II: UNIT OFFERS**

24 CFR 1.4(b)(2)(ii)

**5-II.A. OVERVIEW**

The PHA’s system of unit offers is part of its tenant selection and assignment plan (TSAP). The TSAP must assure equal opportunity and nondiscrimination for all protected classes.

**☑ Decision Point: What records will the PHA maintain relative to unit offers? (Model ACOP, p. 5‑5)**

Things to Consider

* While the need for maintaining a record of unit offers is not specifically addressed in the regulations, such a record is necessary for audit purposes [PH Occ GB, p. 105] and to demonstrate compliance with fair housing requirements.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

The PHA will maintain a record of units offered, including location, date and circumstances of each offer, each acceptance or rejection, including the reason for the rejection.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**5-II.B. NUMBER OF OFFERS**

**☑ Decision Point: What system will the PHA establish for offering units to applicants? (Model ACOP, p. 5‑5)**

Things to Consider

* HUD’s Public Housing Occupancy Guidebook describes two acceptable plans for unit offers: a one-offer plan (“Plan A”) and a two- to three- offer plan (“Plan B”).
* A PHA with site-based waiting lists would generally select Plan A, since applicants would only be offered units in developments which they have selected.
* **Comparison of Plans**

The following information is excerpted from the Public Housing Occupancy Guidebook, p. 103:

* Under Plan A:
* Each applicant gets one offer.
* Applicants have an incentive to accept the unit offered.
* Unless the applicant has good cause for refusing the offer, the applicant should accept it or be dropped to the bottom of or off the waiting list.
* The amount of time spent making offers to any applicant is limited to the time it takes to make one offer.
* The PHA’s record-keeping is limited to the offer made, whether it is accepted or refused, and whether the applicant has good cause for refusal (and is entitled to another offer).
* If PHAs have short waiting lists and allow applicants refusing an offer to be dropped to the bottom of the list, applicants may refuse offers and simply wait until they arrive back at the top of the list in hopes of receiving an offer they prefer.
* Under Plan B:
* Applicants have greater choice of units.
* Occupancy staff should keep track of vacancies by location at all times to ensure the proper order of offers.
* This plan is less effective at very small housing authorities with few locations.
* It is very difficult to lease units at locations with high vacancies, since applicants can refuse offers of these units with impunity.
* Plan B can take three times as long as Plan A to actually lease units, since each applicant receives up to three offers, the offers should be in sequence and subsequent offers cannot be made until an applicant refuses the first and second offers.
* Plan B can permit applicant to self segregate.
* Use of Plan B can increase a PHA’s leasing time and turnaround time.
* **Site-based Waiting Lists**
* As noted above, PHAs with site-based waiting lists would generally choose Plan A. If the PHA allows applicants to be listed at more than one site, the PHA should ensure that each applicant receives only one offer (not one offer per site).

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

The PHA has adopted a “two-to-three offer plan” for offering units to applicants. Under this plan, the PHA will determine how many locations within its jurisdiction have available units of suitable size and type in the appropriate type of project. The number of unit offers will be based on the distribution of vacancies. If a suitable unit is available in:

Three (3) or more locations: The applicant will be offered a unit in the location with the highest number of vacancies. If the offer is rejected, the applicant will be offered a suitable unit in the location with the second highest number of vacancies. If that unit is rejected, a final offer will be made in the location with the third highest number of vacancies. The offers will be made in sequence and the applicant must refuse an offer before another is made.

Two (2) locations: The applicant will be offered a suitable unit in the location with the higher number of vacancies. If the offer is rejected, a final offer will be made at the other location. The offers will be made in sequence and the applicant must refuse the first offer before a second offer is made.

One (1) location: The applicant will be offered a suitable unit in that location. If the offer is rejected, the applicant will be offered the next suitable unit that becomes available, whether it is at the same location as the first offer or at another location. The second unit offer will be the final offer, unless there is good cause for refusing the offer.

If more than one unit of the appropriate type and size is available, the first unit to be offered will be the first unit that is ready for occupancy.

🞎 *Option 2: Establish a unit offer system based on “Plan A”. Delete the model ACOP language and insert the language below.*

The PHA has adopted a “one offer plan” for offering units to applicants. Under this plan the first qualified applicant in sequence on the waiting list will be made one offer of a unit of the appropriate size.

🞎 *Option 3: Select this option if the PHA has established site-based waiting lists. Establish a unit offer system based on “Plan A”. Delete the model ACOP language and insert the language below.*

The PHA has adopted a “one offer plan” for offering units to applicants. Under this plan the first qualified applicant in sequence on the waiting list will be made one offer of a unit of the appropriate size, at a site in which the applicant has applied to reside.

🞎 *Option 4: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**5-II.C. TIME LIMIT FOR UNIT OFFER ACCEPTANCE OR REFUSAL**

**☑ Decision Point: After a unit is offered to an applicant, how much time will the family have to decide whether to accept or reject the unit? (Model ACOP, p. 5‑6)**

Things to Consider

* Although 10 business days in which to respond is the standard used throughout much of the ACOP, filling vacant units is an utmost priority for any well-run public housing program. Therefore the model policy abbreviates response time for a family to accept or reject a unit.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

Applicants must accept or refuse a unit offer within 3 business days of the date of the unit offer.

Offers made by telephone will be confirmed by letter or email.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**5-II.D. REFUSALS OF UNIT OFFERS**

**Good Cause for Unit Refusal**

**☑ Decision Point: What circumstances are considered good cause for refusal of a unit offer? (Model ACOP, p. 5‑6)**

Things to Consider

* Regulations at 24 CFR 945.303(d) prohibit the PHA from penalizing an elderly or disabled family that refuses an offer of designated housing. This rule applies only to designated elderly and designated disabled developments. The rule does NOT apply to refusals for mixed population (elderly and disabled) developments.
* The definition of good cause contained in the model policy is based on guidance in the Public Housing Occupancy Guidebook and is considered safe harbor [PH Occ GB, p. 104].
* The model policy uses the same definition for good cause refusal for waiting list applicants as it does for transfers. If the definition of *good cause* is revised in this section, you may also want to revise the definition in section 12-IV.D.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

Applicants may refuse to accept a unit offer for “good cause.” *Good cause* includes situations in which an applicant is willing to move but is unable to do so at the time of the unit offer, or the applicant demonstrates that acceptance of the offer would cause undue hardship not related to considerations of the applicant’s race, color, national origin, etc. [PH Occ GB, p. 104]. Examples of good cause for refusal of a unit offer include, but are not limited to, the following:

The family demonstrates to the PHA’s satisfaction that accepting the unit offer will require an adult household member to quit a job, drop out of an educational institution or job training program, or take a child out of day care or an educational program for children with disabilities.

The family demonstrates to the PHA’s satisfaction that accepting the offer will place a family member’s life, health, or safety in jeopardy. The family should offer specific and compelling documentation such as restraining orders; other court orders; risk assessments related to witness protection from a law enforcement agency; or documentation of domestic violence, dating violence, sexual assault, stalking, or human trafficking in accordance with section 16-VII.D of this ACOP. Reasons offered must be specific to the family. Refusals due to location alone do not qualify for this good cause exemption.

A health professional verifies temporary hospitalization or recovery from illness of the principal household member, other household members (as listed on final application) or live-in aide necessary to the care of the principal household member.

The unit is inappropriate for the applicant’s disabilities, or the family does not need the accessible features in the unit offered and does not want to be subject to a 30-day notice to move.

The unit has lead-based paint and the family includes children under the age of six.

In the case of a unit refusal for good cause the applicant will not be removed from the waiting list as described later in this section. The applicant will remain at the top of the waiting list until the family receives an offer for which they do not have good cause to refuse.

The PHA will require documentation of good cause for unit refusals.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**Unit Refusal without Good Cause**

**☑ Decision Point: What actions will the PHA take when an applicant refuses the final unit offer without good cause? (Model ACOP, p. 5‑7)**

Things to Consider

* HUD regulations do not specify actions to be taken after refusal of the final unit offer. HUD’s PH Occupancy Guidebook lists refusal of a unit offer as cause for removal from the waiting list [PH Occ GB, p. 104].
* Applicants removed from the waiting list have the right to an informal hearing.
* Some PHAs remove applicants from the waiting list and require reapplication; this is the default in the model policy. If the waiting list is closed at the time of the applicant’s removal, the applicant must wait indefinitely to reapply for assistance.
* Other PHAs “drop” the family to the bottom of the list by changing the application date and time to the current date. Under this policy the applicant is not removed from the list and reapplication is not required (see Option 2).
* Some PHAs penalize applicants by changing their application date and time and removing any local preferences for a specified period. While there is no regulation or guidance forbidding this approach, it is not recommended due to the added administrative burden of tracking disqualification periods.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

When an applicant rejects the final unit offer without good cause, the PHA will remove the applicant’s name from the waiting list and send notice to the family of such removal. The notice will inform the family of their right to request an informal hearing and the process for doing so (see Chapter 14).

The applicant may reapply for assistance if the waiting list is open. If the waiting list is not open, the applicant must wait to reapply until the PHA opens the waiting list.

🞎 *Option 2:* *Delete the model ACOP language and insert the language below.*

When an applicant rejects the final unit offer without good cause, the PHA will place the applicant’s name at the bottom of the waiting list.

To place the applicant’s name at the bottom of the waiting list, the PHA will change the date and time of application to the date and time of the final unit offer rejection. The applicant will retain any local preferences for which they qualify.

🞎 *Option 3: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**5-II.E. ACCESSIBLE UNITS**

**☑ Decision Point: What policies will the PHA adopt for offering units with accessibility features for persons with mobility, sight or hearing impairments (accessible units)? (Model ACOP, p. 5‑8)**

Things to Consider

* The PHA may not skip over applicants requiring an accessible unit until such a unit is available. The PHA must offer units in the appropriate order regardless of the applicant’s disabilities. However, the applicant may refuse the offer of a non-accessible unit and the refusal will be considered to be for “good cause.”
* An accessible unit would only be offered to a family that does not need the accessible features if such an offer were necessary to avoid vacancy loss.
* A non-disabled family occupying an accessible unit may be required to move with 30 days notice when a resident or applicant needs the accessible features and a non-accessible unit is available. The model policy includes this requirement.
* The transfer policy in Section 12-II.B. identifies the transfer of a non-disabled family from an accessible unit to a non-accessible unit (when a family needs the accessible unit) as a PHA-required transfer. The policy in Chapter 12 is based on the policy in this section which requires the family to agree to move when the accessible unit is needed.

🞎 *Option 1: Use the model ACOP language shown below. No changes to the model ACOP are needed.*

Families requiring an accessible unit may be over-housed in such a unit if there are no resident or applicant families of the appropriate size who also require the accessible features of the unit.

When there are no resident or applicant families requiring the accessible features of the unit, including families who would be over-housed, the PHA will offer the unit to a non-disabled applicant.

When offering an accessible unit to a non-disabled applicant, the PHA will require the applicant to agree to move to an available non-accessible unit within 30 days when either a current resident or an applicant needs the features of the unit and there is another unit available for the non-disabled family. This requirement will be a provision of the lease agreement.

🞎 *Option 2: Use PHA-established policy. Edit the model ACOP language or delete it and insert the PHA’s policy.*

**5-II.F. DESIGNATED HOUSING**

“Designated housing” refers to developments or portions of developments designated for occupancy by elderly families only or by disabled families only. “Designated housing” does **not** include mixed population developments for elderly **and** disabled families.

HUD requires PHAs operating designated housing to submit a Designated Housing Plan. The Designated Housing Plan must be approved by HUD and must include any occupancy policies established by the PHA.

**☑ Decision Point: If the PHA has not designated developments or portions of developments for occupancy by elderly families only or by disabled families only, delete this section (5-II.F.) from the model ACOP. (Model ACOP, p. 5‑8)**

Things to Consider

* If the PHA **has** designated developments or portions of developments for occupancy by elderly families only or by disabled families only, retain the model ACOP’s cross-reference to the Designated Housing Plan, or copy applicable portions of the Designated Housing Plan into this section of the Model ACOP. If you choose to do this you will need to ensure that any revisions to the Designated Housing Plan are also reflected in the Model ACOP.

**FINALIZING THE DOCUMENT**

Take a final look at the changes you have made in this chapter of the ACOP.  
Have you:

(1) Added or subtracted any exhibits at the end of the chapter?  Yes  No.

(2) Added, subtracted or reordered any major sections (at the A, B, or C level?)  Yes  No

If you answered yes to either of these questions, you must adjust the chapter to match your changes.

**☑ Decision Point: Are any changes required to this chapter?**

No. No changes to the model policy are needed.

Yes. Edits only. Edit and insert PHA language as appropriate.

Yes. PHA changed the organization of the chapter. Adjust the chapter to reflect your changes **and** review the rest of the document to make sure that any references to section numbers are correct.

**☑ Decision Point: Are changes required in other chapters as a result of changes to this chapter?**

Check the “Things to Consider” under each decision point to identify if changes to the model policy will require changes to policies in other chapters of the ACOP.

No. Changes to other chapters are not necessary.

Yes. Changes to the following chapters are also required: