



Admissions and Continued Occupancy Policy Revision Summary

1. Overview of the Revisions

The ACOP is the Housing Authority of Savannah's (HAS) governing policy for the public housing program. It sets out how HAS takes applications, determines eligibility, calculates income and rent, verifies information, conducts reexaminations, and ends tenancies. HUD requires each housing authority to adopt written admission and occupancy policies, and the Board approves those policies and any changes to them.

The revisions, shown in **red** in the redlined version of the ACOP, fall into four categories:

- **HOTMA income, asset and reexamination rules.** Chapters 6, 7 and 9 now contain the full HOTMA rules for income, assets, deductions, verification and reexaminations, and no longer refer to the earlier pre-HOTMA chapters 7.A and 9.A.
- **2026 HUD guidance.** The ACOP adopts the January 1, 2027 HOTMA compliance date, the April 2026 revision of HUD's HOTMA notice, 2026 dollar thresholds, and the Savannah over-income limits.
- **Other HUD program updates.** New or updated sections cover the Deceased Tenants Report, Enterprise Income Verification (EIV) searches, NSPIRE inspections, de minimis errors, and the asset limitation.
- **Fair housing and administrative updates.** Chapter 2 reflects current federal fair housing and language access guidance; other changes update unit offers, pets, family absence, citations and the Glossary.

In all, 67 sections contain revisions across 11 chapters, including the Introduction and the Glossary. The summary below lists every revised section with its page number in the redlined ACOP.

Section-by-Section Revision Summary

The summary below lists, by the each chapter of the ACOP, the section that contains red-marked text and states the revision made. Where a revision relates to a 2026 HUD update under HOTMA, the update is noted. Page numbers refer to the redlined ACOP chapter/section and use the chapter-page format shown in its footers.

Introduction Chapter

- **HOTMA Changes in the ACOP (Introduction, page Intro-i):**
 - Entire subsection deleted, including the HOTMA 102/104 background, the statement that HAS could not fully comply because HUD's IMS/PIC system could not accept HOTMA-compliant Form HUD-50058s, and the July 1, 2025 implementation date for policies not dependent on HUD systems.
 - **HOTMA 2026 update:** Notice PIH 2026-15 replaces HUD's open-ended compliance delay with a fixed January 1, 2027 compliance date for HOTMA Sections 102 and 104.
- **Section -About the ACOP – References Cited (Introduction, page Intro-ii):**
 - Following HUD guidance remains optional as long as HAS policies comply with law and

- mandatory policy, “and such HUD guidance has not been rescinded” (added).
- Sentence on “Content contained on the HUD website” replaced with a broader list of clarifying sources: HUD website material, HUD memos, HUD emails sent to executive directors, and HUD responses to email inquiries.
- Adds examples of how federal, state, and local law apply (landlord-tenant rules, building and safety codes, zoning, fair housing) and states that landlords and HASs “must follow whichever law is more restrictive.”
- **Resources Cited in the ACOP; Resources and Where to Find Them (Introduction, pages Intro-iii to Intro-iv):**
 - Notice PIH 2023-27 entry: “On September 29, 2023” deleted; adds “A revised version of the notice was issued April 16, 2026.”
 - “HUD-50058 Instruction Booklet” renamed “**Form HUD-50058 Instruction Booklet.**”
 - HOTMA Implementation Notice link replaced with the current HUD PIH address (PIH 2023-27 – HOTMA Notice).
 - The same revision date and link are added in the first copy of the Introduction.
 - **HOTMA 2026 update:** Revision 3 of Notice PIH 2023-27, issued April 16, 2026, is now the cited version of HUD’s HOTMA implementation guidance.

Chapter 1 – Overview of the Program and Plan

- **Overview and History of the Program (Section 1-II.A, page 1-5):**
 - Adds the further revised Notice PIH 2023-27 (Revision 3) issued April 16, 2026.
 - Adds Notice PIH 2026-15 (May 14, 2026): HOTMA Sections 102 and 104 mandatory as of January 1, 2027 for all HASs except Moving to Work agencies and HASs that use only HUD’s Family Reporting Software; all Form HUD-50058 transactions effective January 1, 2027 and later must be HOTMA-compliant.
 - **HOTMA 2026 update:** Notice PIH 2026-15 makes HOTMA Sections 102 and 104 mandatory on January 1, 2027, so agencies that start annual reexaminations 120 days early apply HOTMA rules beginning September 2026.

Chapter 2 – Fair Housing and Equal Opportunity

- **Overview (Section 2-I.A, page 2-3):**
 - “HUD regulations provide” replaced with “24 CFR 5.105(a)(2) currently provides” for protections regarding sexual orientation, gender identity, and marital status.
 - “The HAS will” replaced with “All HASs must” comply fully with nondiscrimination laws.
- **Nondiscrimination (Section 2-I.B, page 2-4):**
 - Equal Access Rule paragraph rewritten: the HAS will not discriminate on marital status, gender identity, or sexual orientation “as currently required under 24 CFR 5.105(a)(2).”
 - Adds HUD’s April 28, 2026 proposed rule to replace references to “gender” and “gender identity” with “sex” as defined by Executive Order 14168 (not yet final), and notes that state protections vary.
 - Deleted the statement that elimination of the regulation was under OMB review as of Spring 2026.

- ***Discrimination Complaints (Section 2-I.C, page 2-6):***
 - Families are advised they may file a fair housing complaint “with HUD” (added).
 - Adds ways to file an FHEO complaint: online, by phone, or by mailing a housing discrimination complaint form to the regional FHEO office.
- ***Overview – Serving Limited English Proficiency Persons (Section 2-III.A, page 2-18):***
 - Adds FHEO Memo 9/19/25 to the section citations.
 - Adds that HUD FHEO will prioritize enforcement involving intentional discrimination where language is used as a proxy for national origin.
 - “memo” changed to “OAG Memo.”
- ***Definition of a Person with a Disability Under Federal Civil Rights Laws (Exhibit 2-1, page 2-21):***
 - “\$400” deleted before “elderly/disabled household deduction.”
 - **HOTMA 2026 update:** HOTMA replaced the fixed \$400 elderly/disabled family deduction with an amount that HUD adjusts annually for inflation.

Chapter 3 – Eligibility

- ***Introduction (Chapter 3, page 3-1):***
 - Adds two eligibility requirements: not currently receiving a duplicative subsidy, and, upon full implementation of HOTMA, meeting the net asset and real property ownership restrictions.
 - **HOTMA 2026 update:** The net asset and real property restrictions at 24 CFR 5.618 take effect with the January 1, 2027 compliance date in Notice PIH 2026-15.
- ***Family and Household (Section 3-I.B, page 3-3):***
 - Adds the citation [24 CFR 5.100] to the definitions of gender identity and sexual orientation.
- ***Citizenship or Eligible Immigration Status (Section 3-II.C, page 3-16):***
 - Notification requirement expanded to cover eligible immigration status or electing not to contend status, citing 24 CFR 5.508(f)(1)(i).
 - Declaration now required of each family member “regardless of age”; “personally” deleted; minors’ declarations signed by “an adult residing in the assisted unit who is responsible for the child” (replacing “a parent or guardian”).
- ***Family Consent to Release of Information (Section 3-II.E, page 3-21):***
 - New section: the head, spouse, or cohead (regardless of age) and each adult must sign Forms HUD-9886-A and HUD-52675; consent remains effective until denial, termination, or written revocation; admission is denied if required consent forms are not signed.
 - HAS policy: revoking consent to access financial institution records will result in denial of admission.
 - **HOTMA 2026 update:** The one-time consent form and the financial-records revocation option at 24 CFR 5.230 and 5.232 are HOTMA Section 102/104 provisions.
- ***EIV System Searches (Section 3-II.F, pages 3-22 to 3-23):***
 - New section covering the EIV Existing Tenant Search before admission (no duplicative

assistance), the Debts Owed to HASs and Terminations module (dispute process; three-year dispute period), and review of the EIV Income Report within 120 days after move-in data is sent to HUD.

- HAS policy: confirm move-out with the other HAS or owner and approve assistance only contingent on move-out; Form HUD-52675 signed once at eligibility and by members added later; Debts Owed module searched at eligibility and for added members.
- **HOTMA 2026 update:** The section cites Notice PIH 2023-27, HUD's HOTMA guidance as revised April 16, 2026.
- **Overview – Denial of Admission (Section 3-III.A, page 3-24):**
 - Deleted "HUD does not require the adoption of 'One Strike' policies."
 - Adds "The asset limitation in public housing" to the list of topics in Part III.

HOTMA 2026 update: The asset limitation added to the list becomes enforceable on the January 1, 2027 compliance date in Notice PIH 2026-15.

- **Restriction on Assistance Based on Assets (Section 3-III.C, pages 3-26 to 3-27):**
 - Deleted the note that the asset limitation section applies only upon the HAS's HOTMA 102/104 compliance date.
 - New section: a family is ineligible if net assets exceed the HUD-published asset limitation, or if it owns real property suitable for occupancy with a present ownership interest, a legal right to reside, and authority to sell; lists exceptions (manufactured home assistance, jointly owned property occupied by a co-owner, property offered for sale, VAWA victims) and suitability criteria.
 - HAS policy: "not sufficient for the size of the family" means overcrowded under Chapter 5 occupancy standards; geographic hardship includes unreasonable distance to work, school, health care, or other services, or a lack of adequate transportation.
 - **HOTMA 2026 update:** The asset limitation at 24 CFR 5.618 applies at admission from the January 1, 2027 compliance date, using HUD's annually adjusted limit.
- **Screening (Section 3-III.E, page 3-31):**
 - Adds that the HAS will request a fingerprint card and NCIC information when criminal background results are inconclusive.
 - Adds that applicants must list every state where any household member has resided; inaccurate answers are cause for denial [Notice PIH 2012-28].
- **Prohibition Against Denial of Assistance to Victims of Domestic Violence, Dating Violence, Sexual Assault, Stalking, and Human Trafficking (Section 3-III.G, page 3-39):**
 - Adds that, absent a final VAWA 2022 rule and to mirror HUD's usage, the policy includes human trafficking wherever domestic violence, dating violence, sexual assault, and stalking are listed.

Chapter 4– Applications, Waiting List And Tenant Selection

- Deconcentration of Poverty and Income-Mixing (4-III.B. Selection Method)
 - Changed deconcentration policy

Chapter 5 – Occupancy Standards and Unit Offers

- **Number of Offers (Section 5-II.B, page 5-6):**
 - Two-unit offer paragraph rewritten: the HAS assesses all locations “within its jurisdiction and portfolio” for units of the appropriate bedroom size and type, and the number of offers corresponds to the current distribution of vacancies.
- **Time Limit for Unit Offer Acceptance or Refusal (Section 5-II.C, page 5-7):**
 - Telephone offers confirmed by “notification through the online application portal” or email (replacing “letter”).

Chapter 6 – Income and Rent Determinations

- **Chapter Introduction (Chapter 6, page 6-1):**
 - Adds the compliance date: “which HUD has set as January 1, 2027 [Notice PIH 2026-15].”
 - **HOTMA 2026 update:** Notice PIH 2026-15 sets January 1, 2027 as the compliance date, with exceptions for MTW agencies and agencies that use only HUD’s Family Reporting Software.
- **Earned Income (Section 6-I.D, page 6-11):**
 - New section: earned income of members 18 or older and of the head, spouse, or cohead is included; day laborer and seasonal worker income is included and not treated as nonrecurring; defines earned income, day laborer, and seasonal worker.
 - HAS policy: count gross wages including overtime, commissions, fees, tips, and bonuses; average bonuses or commissions over the prior two years (one year if that is all that is available).
 - **HOTMA 2026 update:** The earned income, day laborer, and seasonal worker definitions at 24 CFR 5.100 and 5.603 are HOTMA definitions, mandatory January 1, 2027.
- **Business and Self-Employment Income (Section 6-I.E, pages 6-14 to 6-15):**
 - New section: defines net business income; no deduction for business expansion or amortization of capital indebtedness; straight-line depreciation allowed; independent contractor and “gig worker” income included and not treated as nonrecurring.
 - HAS policy: defines business expansion, with examples.
 - **HOTMA 2026 update:** The independent contractor definition at 24 CFR 5.603(b) is a HOTMA definition, mandatory January 1, 2027.
- **Periodic Payments (Section 6-I.G, page 6-24):**
 - Adds Alimony and Child Support subsection: count amounts actually received, not amounts ordered by a court or agency.
 - HAS policy: no payments in the past three months means none counted; regular payments counted at the amount received in the last 12 months, excluding lump sums; lump sums counted only if a similar payment is likely in the next 12 months.

- **HOTMA 2026 update:** Counting only amounts actually received follows the HOTMA income definition and Notice PIH 2023-27.
- ***Nonrecurring Income (Section 6-I.H, pages 6-25 to 6-26):***
 - New section: income that will not be repeated beyond the coming year is excluded and may be self-certified; independent contractor, day laborer, and seasonal income is not excluded.
 - Lists examples (utility assistance, eviction prevention, security deposits, research payments, one-time payments) and the exclusions at 24 CFR 5.609(b)(24)(i)–(vii): Census employment, stimulus payments, tax refunds and credits, gifts, food bank donations, and lump-sum additions to assets.
 - **HOTMA 2026 update:** The nonrecurring income exclusion at 24 CFR 5.609(b)(24) is among the HOTMA provisions agencies were required to apply by July 1, 2025.
- ***Civil Rights Settlements (Section 6-I.K, page 6-28):***
 - Adds “(\$52,787 for 2026)” to the HUD-published threshold amount.
 - **HOTMA 2026 update:** \$52,787 is HUD’s 2026 inflation-adjusted net family asset threshold under HOTMA.
- ***Assets Disposed of for Less than Fair Market Value (Section 6-II.B, page 6-39):***
 - Adds the two-year look-back rule; an asset moved to a family member’s retirement account is not disposed of for less than fair market value; the family must certify any such dispositions.
 - HAS policy: value counted only when the cumulative fair market value exceeds the amount received by more than \$1,000.
 - **HOTMA 2026 update:** The two-year look-back for assets disposed of below fair market value is part of the HOTMA net family assets definition at 24 CFR 5.603(b).
- ***Asset Inclusions and Exclusions (Section 6-II.C, pages 6-41 to 6-44, 6-46 to 6-49):***
 - New section on necessary and non-necessary personal property (with HUD’s example table), non-necessary property counted only above the threshold (\$52,787 for 2026), checking and savings accounts, lump-sum additions, jointly owned assets, life insurance cash value, and the 12-month exclusion of federal tax refunds.
 - HAS policy: use the family’s estimate of non-necessary property value, with an appraisal if the estimate may be off by \$50 or more; lump sums counted only if retained as an asset.
 - Adds “(\$52,787 for 2026)” to the revocable trust paragraph.
 - **HOTMA 2026 update:** Excluding necessary personal property, and non-necessary property valued at or below \$52,787 for 2026, is a HOTMA change to net family assets.
- ***Determining Income from Assets (Section 6-II.D, pages 6-51 to 6-52):***
 - New section: net family assets defined as net cash value after reasonable costs of disposal; threshold of \$52,787 for 2026.
 - HAS policy: reasonable disposal costs include early withdrawal penalties, broker and legal fees, and real estate settlement costs and transfer taxes.
 - **HOTMA 2026 update:** Notice PIH 2026-15 confirms the \$52,787 threshold and a 0.4 percent passbook rate for imputing asset income in 2026.
- ***Introduction – Adjusted Income (Section 6-III.A, page 6-54):***

- Deduction amounts marked in red: \$500 per dependent and \$550 for any elderly or disabled family.
- **HOTMA 2026 update:** Notice PIH 2026-15 sets the dependent deduction at \$500 for 2026 income examinations; both deductions are adjusted annually under HOTMA.
- **Dependent Deduction (Section 6-III.B, page 6-56):**
 - Dependent deduction amount marked in red: \$500.
 - **HOTMA 2026 update:** Notice PIH 2026-15 sets the dependent deduction at \$500 for 2026 income examinations.
- **Elderly or Disabled Family Deduction (Section 6-III.C, page 6-56):**
 - New section: single \$550 deduction for any elderly or disabled family, adjusted annually by HUD; defines elderly family and disabled family [24 CFR 5.403].
 - **HOTMA 2026 update:** HOTMA replaced the fixed \$400 deduction with an inflation-adjusted amount reported on Form HUD-50058.
- **Disability Assistance Expenses Deduction (Section 6-III.E, pages 6-61 to 6-63):**
 - Adds Eligible Auxiliary Apparatus and Eligible Attendant Care subsections with examples.
 - HAS policy: maintenance and repair of an apparatus and of special adaptations are eligible; service animal costs included; attendant care counted for work hours plus reasonable transportation time and prorated when the attendant also serves others.
 - **HOTMA 2026 update:** Under HOTMA these expenses are deductible only above 10 percent of annual income, subject to the hardship relief in 6-III.G.
- **Hardship Exemptions (Section 6-III.G, pages 6-68 to 6-71, 6-74 to 6-77):**
 - New section on hardship relief for health and medical care and disability assistance expenses: phased-in relief (5 percent for 12 months, 7.5 percent for the next 12 months, then 10 percent) and general relief.
 - Phased-in eligibility date changed from “January 1, 2024” to the date the PHA begins implementing the relief or the applicable HOTMA compliance deadline, whichever occurs first.
 - HAS policy: phased-in relief not continued for families moving from HCV to public housing; defines change in circumstances and examples of financial hardship; third-party verification required.
 - Deleted HAS policy paragraphs that granted general relief and 12-month extensions to families who first qualified on or after January 1, 2024.
 - Adds the childcare expense hardship exemption, notice requirements, and 90-day exemption periods with extensions; HAS policy: decision within 30 calendar days and written notice within 10 business days.
 - **HOTMA 2026 update:** Notice PIH 2026-15 starts phased-in relief (5 percent, then 7.5 percent) at the first reexamination after an agency begins full HOTMA compliance.

Chapter 7 – Verification

- **Chapter Title and Introduction (Chapter 7, page 7-1):**
 - Title changed from “Chapter 7.B. Verification under HOTMA 102/104” to “Chapter 7 Verification.”

- Adds the compliance date of January 1, 2027 [Notice PIH 2026-15]; deleted the reference to following Chapter 7.A before that date.
 - **HOTMA 2026 update:** With the January 1, 2027 compliance date set by Notice PIH 2026-15, the pre-HOTMA Chapter 7.A is no longer referenced.
- **Family Consent to Release of Information (Section 7-I.A, page 7-3):**
 - Heading adds “Authorization for Release of Information”; deleted the duplicate opening sentence on signing Form HUD-9886-A; wording edits state the form “is only signed once.”
- **Verification Hierarchy (Section 7-I.D, page 7-10):**
 - Net asset threshold now cites HUD’s Inflation-Adjusted Values tables; “(\$52,787 for 2026)” deleted.
 - **HOTMA 2026 update:** The threshold is HUD’s annually adjusted HOTMA amount, \$52,787 for 2026.
- **Up-Front Income Verification (UIV) (Section 7-I.E, pages 7-12, 7-14):**
 - Adds New Hires Report subsection: review at annual reexamination unless Safe Harbor verification is used, and quarterly after an interim decrease if the HAS requires interims for earned income increases.
 - Deceased Tenants Reports: citation changed from Notice PIH 2012-4 to Notice PIH 2026-11; review changed from “quarterly” to “monthly”; adds confirmation request within 24 hours, a 30-day response period, a home visit, and new head of household procedures.
 - HAS policy: if only minors remain, follow the Caretakers for a Child policy (Section 6-I.B); deleted the prior monthly review policy and move-out date language.
 - Adds Other EIV Reports subsection: Multiple Subsidy Report reviewed quarterly; Failed EIV Pre-Screening and Failed Verification reports reviewed monthly.
 - **HOTMA 2026 update:** The Deceased Tenants Report changes follow Notice PIH 2026-11, not HOTMA; the other EIV report requirements follow Notice PIH 2023-27.
- **Level 4 Verification (Section 7-I.F, page 7-17):**
 - Hyphen corrected in “third-party”; no change in substance.
- **Self-Certification (Section 7-I.I, page 7-21):**
 - Adds “(\$52,787 for 2026)” to the net asset threshold.
 - **HOTMA 2026 update:** \$52,787 is HUD’s 2026 inflation-adjusted net family asset threshold under HOTMA.
- **Social Security Numbers (Section 7-II.B, page 7-23):**
 - Adds the option to accept a self-certification plus a third-party document showing the applicant’s name when all other attempts to obtain SSN documentation are exhausted; an SSN verified in EIV needs no further verification; a failed SSA identity match requires valid documentation or assistance is terminated.
 - HAS policy: method used only as a last resort; SSN documents rejected only if not original, altered, mutilated, illegible, or appearing forged.
 - **HOTMA 2026 update:** The SSN self-certification option comes from Notice PIH 2023-27, HUD’s HOTMA implementation guidance.
- **Business and Self-Employment Income (Section 7-III.B, page 7-33):**
 - Hyphen added to the heading (“Self-Employment”); no change in substance.

- ***Alimony or Child Support (Section 7-III.D, page 7-35):***
 - Adds Notice PIH 2023-27 citation and states that income is based on amounts received; a court order or payment agreement alone may not be sufficient verification.
 - **HOTMA 2026 update:** Counting only amounts actually received follows the HOTMA income definition and Notice PIH 2023-27.
- ***Nonrecurring Income (Section 7-III.E, page 7-35):***
 - New section: self-certification that income will not be repeated is accepted; HAS policy allows third-party verification case by case.
 - **HOTMA 2026 update:** Nonrecurring income is a HOTMA exclusion at 24 CFR 5.609(b)(24).
- ***Assets and Income from Assets (Section 7-III.F, pages 7-36 to 7-37):***
 - “(\$52,787 for 2026)” deleted from the asset self-certification paragraph.
 - Adds real property self-certification: the HAS may accept a certification of no present ownership; third-party verification required if ownership is declared.
 - HAS policy: certification signed by all members 18 or older; third-party verification of right to reside, authority to sell, and suitability; self-certification accepted for VAWA victims.
 - **HOTMA 2026 update:** Real property self-certification supports the HOTMA asset limitation at 24 CFR 5.618.
- ***Federal Tax Refunds or Refundable Tax Credits (Section 7-III.H, page 7-38):***
 - New section: no verification of refunds or credits required when net assets are at or below the threshold (\$52,787 for 2026); verification required above it.
 - **HOTMA 2026 update:** HOTMA excludes federal tax refunds and refundable tax credits from net family assets for 12 months after receipt.
- ***Retirement Accounts (Section 7-III.I, page 7-38):***
 - New section; HAS policy accepts an original document dated within 12 months showing distributions, lump sums taken, and regular payments.
 - **HOTMA 2026 update:** Supports the HOTMA treatment of retirement accounts at 24 CFR 5.603 and 5.609(b)(26).
- ***Income from Excluded Sources (Section 7-III.J, page 7-39):***
 - New section distinguishing fully excluded income (self-certification accepted; no third-party verification or Form HUD-50058 reporting) from partially excluded income (verification hierarchy and Form HUD-50058 reporting required).
 - HAS policy: self-certification accepted for fully excluded income; partially excluded income verified under Part I.
 - **HOTMA 2026 update:** The HOTMA income exclusions are among the provisions agencies were required to apply by July 1, 2025.
- ***Zero Income Families (Section 7-III.K, page 7-40):***
 - New section: zero income may be self-certified without notarization; no monetary value assigned to food bank donations; HASs that perform zero income reviews must update policies and forms.

- HAS policy: check UIV and third-party sources; each member claiming zero income completes a zero-income form; interims only under Chapter 9 policy.
- **HOTMA 2026 update:** Follows Notice PIH 2023-27, HUD's HOTMA implementation guidance.
- ***Student Financial Assistance (Section 7-III.L, page 7-41):***
 - Adds that assistance under Section 479B of the Higher Education Act is excluded.
 - Adds that the HAS will not request verification of actual covered costs when the student's only assistance is under Title IV of the HEA.
 - **HOTMA 2026 update:** HOTMA's two-category treatment of student financial assistance is at 24 CFR 5.609(b)(9).
- ***Childcare Expenses (Section 7-IV.D, page 7-48):***
 - Child eligibility changed from "12 or younger" to "under the age of 13."

Chapter 8 – Leasing and Inspections

- ***NSPIRE Inspections (Section 8-II.C, pages 8-16 to 8-17):***
 - New section on NSPIRE inspections: resident notice; Life-Threatening and Severe deficiencies corrected within 24 hours with certification to HUD within two business days; Moderate deficiencies within 30 days and Low within 60 days.
 - HAS policy: at least seven days' notice by door posting and email in accessible formats; interim repairs when a permanent repair is not possible within 24 hours; HUD approval for delayed repairs; pet owner present for non-emergency repairs.

Chapter 9 – Reexaminations

- ***Chapter Title and Introduction (Chapter 9, page 9-1):***
 - Title changed from "Chapter 9.B. Reexaminations under HOTMA 102/104" to "Chapter 9 Reexaminations."
 - Adds the compliance date of January 1, 2027 [Notice PIH 2026-15]; deleted the reference to following Chapter 9.A before that date.
 - **HOTMA 2026 update:** With the January 1, 2027 compliance date set by Notice PIH 2026-15, the pre-HOTMA Chapter 9.A is no longer referenced.
- ***Calculating Annual Income at Annual Reexamination (Section 9-I.D, pages 9-5 to 9-6):***
 - New section: annual reexaminations use income for the previous 12 months unless a streamlined or Safe Harbor determination is used; all changes since the last annual reexamination are considered; COLA is always a change; adds the three-step method from Notice PIH 2023-27.
 - HAS policy: the steps do not apply when Safe Harbor is used unless the family disagrees or the HAS reason to use third-party verification.
 - **HOTMA 2026 update:** Using prior-year income at annual reexamination (24 CFR 5.609(c)(2)) is a HOTMA rule that agencies starting reexaminations 120 days early apply from September 2026.

- **Overview – Interim Reexaminations (Section 9-III.A, page 9-14):**
 - Adds that Notice PIH 2023-27 changes interim reexamination conditions; at an interim the family must report all changes in adjusted income and household composition; HUD recommends documenting all reported changes.
 - **HOTMA 2026 update:** Revision 3 of Notice PIH 2023-27 (April 2026) revised the interim reexamination requirements described in this part.
- **Changes in Family and Household Composition (Section 9-III.B, pages 9-15 to 9-16, 9-18):**
 - Adds Conducting Interims subsection: an interim is required whenever household members are added or removed, regardless of the effect on adjusted income, except within the last three months under a written policy; new members' earned income increases are not counted unless there was a prior interim decrease; unearned income is processed regardless of amount.
 - HAS policy: no interim for composition changes within three months of the annual effective date; a new member's earned income is not added until the next annual reexamination.
 - Removal of a member: interim now processed "regardless of whether adjusted income decreases, increases, or does not change" (replacing "for all decreases in adjusted income"); HAS policy updated to match.
 - **HOTMA 2026 update:** Revision 3 of Notice PIH 2023-27 (April 2026) requires an interim reexamination whenever a household member is added or removed.
- **Changes Affecting Income or Expenses (Section 9-III.C, pages 9-19 to 9-22):**
 - Adds the household member exception to the 10 percent decrease threshold and a mandatory interim for decreases of 10 percent or more.
 - Deleted the requirement for interims for any decrease due to a death or move-out and the related non-interim transaction language.
 - Adds Interim Increases subsection: no interim for increases under 10 percent; interim required at 10 percent or more, except for earned income (unless there was a prior interim decrease) and during the last three months.
 - HAS policy: no interim for earned income increases; interim for unearned income increases of 10 percent or more; no interim within three months of the annual effective date, with retroactive increases possible for late reporting.
 - Adds subsections on concurrent and cumulative increases and interims for public housing over-income families.
 - **HOTMA 2026 update:** Revision 3 of Notice PIH 2023-27 (April 2026) requires interims for household composition changes and limits interims for earned income increases.
- **Effective Dates (Section 9-III.D, pages 9-23 to 9-24):**
 - New section: late-reported increases are retroactive to the first of the month after the change; decreases take effect no later than the first rent period after the interim, with an optional retroactive policy.
 - HAS policy: decreases applied the first of the month after the interim; retroactive decreases case by case for extenuating circumstances; repayment agreements for retroactive increases.

- **HOTMA 2026 update:** The interim effective-date rules at 24 CFR 960.257(b)(6) are HOTMA provisions, mandatory January 1, 2027.
- ***Non-Interim Reexamination Transactions (Part IV, page 9-25):***
 - New Part IV listing non-interim transactions (hardship exemption changes, minimum rent hardship, SSN updates, citizenship status changes).
 - Deleted list items for adding or removing non-family members and family members; adds that household member changes are processed under Section 9-III.B, not as non-interim transactions.
 - **HOTMA 2026 update:** Revision 3 of Notice PIH 2023-27 (April 2026) moves household member changes from non-interim transactions to interim reexaminations.

Chapter 10 – Assistance Animals and Pets

- ***Standards for Pets (Section 10-II.C, page 10-10):***
 - Adds to the animals not permitted: any animal considered non-domestic, or not permitted, under state or local law, ordinance, or code.

Chapter 13 – Lease Terminations

- ***Death of a Sole Family Member (Section 13-II.I, page 13-7):***
 - Citation changed from Notice PIH 2012-4 to Notice PIH 2026-11.
 - “The HAS must immediately terminate the lease” replaced with processing an EOP action after confirming the death, with the date of death as the EOP date.
 - Adds judicial removal of unauthorized occupants and warns that changing the locks may result in liability for wrongful eviction.
- ***Family Absence from Unit (moved from 13-III.C) (Section 13-II.I, pages 13-8 to 13-9):***
 - Subsection moved from Section 13-III.C and expanded with HUD absence requirements and verification techniques.
 - HAS policy: written notice at the start of any absence over 30 calendar days (replacing notice within 10 business days); actions to verify absence; lease terminated after 180 consecutive days without verification; reinstatement for HAS error; families may reapply.
 - Deleted the abandonment paragraph.
- ***Over-Income Families (Section 13-II.J, pages 13-10 to 13-11, 13-13 to 13-16):***
 - New section: an over-income family exceeds the over-income limit for 24 consecutive months; the HAS must terminate tenancy or charge the alternative rent under a new lease.
 - HAS policy: charge the alternative non-public housing rent and require a new non-public housing lease rather than terminate.
 - Adds the over-income limit table: \$90,240 (1 person) through \$170,040 (8 persons).
 - Adds the three required notices with HAS policy to notify within 10 business days, and NPHOI lease terms (one-year initial term, no utility allowance, no grievance rights).
 - **HOTMA 2026 update:** The over-income rule implements HOTMA Section 103 and is separate from the January 1, 2027 Section 102/104 deadline.

- **Other Authorized Reasons for Termination (Section 13-III.C, pages 13-26 to 13-27):**
 - Family Absence from Unit subsection deleted (moved to Section 13-II.I).
 - Deleted the compliance-date note and adds the Asset Limitation subsection.
 - HAS policy: total nonenforcement of the asset limitation for participants; it applies only at admission.
 - **HOTMA 2026 update:** HOTMA lets agencies choose not to enforce the asset limitation for current participants; it still applies at admission from January 1, 2027.

Chapter 15 – Program Integrity

- **HAS-Caused Errors – De Minimis Errors (Section 15-II.C, page 15-9):**
 - Adds De Minimis Errors subsection: errors of no more than \$30 per month (\$360 per year) in adjusted income; families credited or repaid for overcharges and not required to repay undercharges.
 - **HOTMA 2026 update:** De minimis error treatment at 24 CFR 5.609(c)(4) is among the HOTMA provisions agencies were required to apply by July 1, 2025.

Glossary

- **Acronyms Used in Public Housing (Glossary, Part A, pages GL-1 to GL-3):**
 - Adds CoC, CPD, EHV, HEA, IMS/PIC, SAFMR, and SAVE; deletes HIP and JTPA.
 - **HOTMA 2026 update:** Notice PIH 2026-15 provides for HOTMA-compliant Form HUD-50058 reporting through IMS/PIC.
- **Glossary of Public Housing Terms (Glossary, Part B, pages GL-4, GL-11 to GL-13, GL-15, GL-17):**
 - Deleted the pre-HOTMA definitions of annual income and net family assets and the “Upon HAS implementation of HOTMA 102/104” labels.
 - Punctuation corrected in the unearned income definition.
 - Adds the Upfront income verification (UIV) definition.
 - **HOTMA 2026 update:** A single set of HOTMA definitions applies from the January 1, 2027 compliance date.