



HCV ADMINISTRATIVE PLAN REVISION

RECOMMENDED ACTION:

Consider for adoption a revision to the Housing Choice Voucher (HCV) Administrative Plan with an effective date of February 1, 2027.

BACKGROUND:

A periodic review of the HCV Administrative Plan is undertaken to:

- 1) Stay compliant with applicable federal laws, regulations and HUD notices,
- 2) Implement the Housing Opportunity Through Modernization Act of 2016 (HOTMA),
- 3) Adopt HUD's National Standards for the Physical Inspection of Real Estate (NSPIRE), and
- 4) Update Housing Authority of Savannah (HAS) local policies and procedures.

SUMMARY OF HUD HOTMA:

The Housing Opportunity Through Modernization Act of 2016 (HOTMA) was signed into law on July 29, 2016, and amended the United States Housing Act of 1937. Title I of HOTMA contains 14 sections that affect the public housing and Section 8 programs. Most of the revisions to the Administrative Plan implement HUD's HOTMA rules, which the revised plan describes as follows (Section 1-II.A, page 1-6):

- **Income and assets (Sections 102, 103 and 104):** Final Rule published February 14, 2023. HUD's implementation guidance is Notice PIH 2023-27, issued September 29, 2023, and revised February 2, 2024, and April 16, 2026.
- **HCV and PBV streamlining (Sections 101, 105, 106 and 112):** the "HOTMA Voucher Final Rule" was published May 7, 2024, with technical amendments published December 8, 2025. It also incorporates changes from the NSPIRE final rule.
- **Compliance date:** Notice PIH 2026-15 (May 14, 2026) makes compliance with Sections 102 and 104 mandatory as of January 1, 2027. All HUD-50058 transactions effective on or after that date must be HOTMA-compliant. Chapters 6, 7 and 11 of the Administrative Plan apply upon the HOTMA 102/104 compliance date.

Key HOTMA changes reflected in the plan:

- **Annual income (Chapter 6):** all income is counted unless specifically excluded under 24 CFR 5.609(b). Exclusions are added or revised for non-recurring income, civil rights settlements, state payments for in-home care, student financial assistance and others. The Earned Income Disallowance is eliminated.
- **Calculating income (Chapters 6 and 11):** anticipated income is used at admission and interim reexamination; at annual reexamination the previous 12 months' income is used, adjusted for current income. Income from assets is always anticipated.
- **Deductions (Chapter 6):** the dependent deduction changes from \$480 to \$525 and the elderly/disabled family deduction from \$400 to \$575, both adjusted annually by HUD. The health and medical care/disability expense threshold rises from 3 percent to 10 percent of annual income, with phased-in and general hardship relief and a childcare expense hardship exemption.
- **Assets (Chapters 3, 6, 7 and 12):** a new asset limitation applies (net family assets above the HUD-published limit of \$109,797 for 2027, or ownership of real property suitable for occupancy). Necessary personal property is excluded; non-necessary personal property and imputed asset income are counted only above the HUD-published threshold (\$54,898 for 2027, as cited in the plan).

- **Interim reexaminations (Chapter 11):** new 10 percent thresholds for income decreases and increases, limits on counting earned income increases, new effective-date rules, and new non-interim reexamination transactions.
- **Verification (Chapters 7 and 14):** form HUD-9886-A is signed once rather than annually; “Safe Harbor” income determinations from other means-tested federal programs may be used; HUD’s verification hierarchy is updated; de minimis errors (\$30 or less per month) are not noncompliance.
- **Voucher and PBV rules (Chapters 5, 6, 8–10 and 16–18):** revised timing for payment standard increases and decreases; initial inspection options and HAP withholding/abatement; HUD extension process for the 60-day HAP contract execution deadline; PBV program cap (20 percent plus 10 percent) and project cap; non-competitive project selection; owner-maintained waiting lists; HAP contract extensions up to 40 years; OCAF rent adjustments.

HAS discretionary policy elections under HOTMA:

- Total nonenforcement of the asset limitation for current participants; the limitation applies only at admission (Section 12-I.E).
- No permissive deductions will be used (Section 6-III.H).
- Safe Harbor income determinations will be accepted at annual reexamination when available (Section 7-I.B).
- Self-certification of net family assets will not be accepted – third-party verification is required every year; self-certification that the family owns no real property will be accepted (Section 7-III.F).
- Revocation of consent to access financial records will result in denial of admission or termination of assistance (Sections 3-II.D, 7-I.A and 12-I.D).
- Interim reexaminations will be processed for a decrease in adjusted income of any amount, will not be processed for increases in earned income, and will be processed for unearned income increases of 10 percent or more; families must report all changes within 10 business days (Section 11-II.C).
- Hardship exemption requests will be decided within 30 calendar days, with 90-day extensions available (Section 6-III.G).

ANALYSIS:

The Housing Authority of Savannah’s (HAS) HCV Administrative Plan has been revised with an effective date of January 1, 2027. The following summarizes, by chapter and section, the changes shown in red in the red line copy of the plan (inserted and deleted text). New Chapter 8.B (NSPIRE) is summarized in full. Page references are to the red line copy.

Changes made throughout the plan (not listed section by section):

- “PHA” is replaced with “housing authority,” “housing agency” or “Housing Authority of Savannah” in HAS policy language, and “model” plan references are removed.
- “Human trafficking” is added wherever the list of VAWA-protected victims appears.
- “HQS” is replaced with “housing quality standards” outside the HQS chapter, and regulatory and HUD notice citations are updated.

Chapter 1 – Overview of the Program and Plan

- **The PHA’s Commitment to Ethics and Service (Section 1-I.E, page 1-3):**
 - “Decent, safe, and sanitary housing” replaced with “safe, habitable housing.”

- **Overview and History of the Program (Section 1-II.A, page 1-6):**
 - Adds HOTMA history: law signed 7/29/2016; income/asset Final Rule (Sections 102/103/104) published 2/14/2023; Notice PIH 2023-27 (revised 2/2/2024 and 4/16/2026); HOTMA Voucher Final Rule 5/7/2024 (technical amendments 12/8/2025); Notice PIH 2026-15 making Sections 102 and 104 mandatory as of January 1, 2027.
- **The HCV Partnerships (Section 1-II.C, page 1-8):**
 - Owner responsibility restated as maintaining the unit under HUD minimum quality standards per 24 CFR 5.703 (replacing “Housing Quality Standards (HQS)”).
- **Contents of the Plan (Section 1-III.B, page 1-14):**
 - List of required plan contents expanded per 24 CFR 982.54: foster child/foster adult/live-in aide residency policies; SAFMR adoption; payment standard increases/decreases; designated-area payment standards; frequency of income determinations and acceptance of family declaration of assets; PHA-adopted life-threatening deficiencies; initial-inspection NLT option; alternative inspections; reinspection fees; HAP withholding; relocation assistance; multiple RFTAs; insufficient-funding termination priorities; special purpose vouchers.

Chapter 2 – Fair Housing and Equal Opportunity

- **Chapter 2 Introduction (page 2-1):**
 - Part III description retitled “Serving Limited English Proficient (LEP) Persons”; reference to the 2007 LEP Final Guidance removed.
- **Overview (Section 2-I.A, page 2-3):**
 - Cites 24 CFR 5.105(a)(2) for protections on sexual orientation, gender identity and marital status; removes citation to the 2012 Equal Access Final Rule/Notice PIH 2014-20.
- **Nondiscrimination (Section 2-I.B, page 2-4):**
 - Adds note that HUD has halted enforcement of the Equal Access Rule, rescinded Notice PIH 2014-20, and published a proposed rule (4/28/2026) not yet final.
- **Discrimination Complaints (Section 2-I.C, page 2-6):**
 - Section numbered 2-I.C. HAS will investigate and attempt to remedy complaints within 10 business days and advise families of their right to file with HUD FHEO; fair housing poster will reference how to file; prior written-notice/findings steps removed. New VAWA Complaint Processing subsection (Notice FHEO 2023-01): VAWA complaints may be filed with FHEO within one year; HAS policy to advise families of this right.
- **Definition of Reasonable Accommodation (Section 2-II.B, page 2-10):**
 - Adds two examples: exceptions to subsidy standards, and changing the rent due date to align with SSI/SSDI receipt.
- **Physical Accessibility (Section 2-II.G, page 2-16):**
 - Briefing packet will include notice that HAS will provide a current list of known accessible units and assist families that include a person with disabilities [24 CFR 982.301(b)(12)].
- **Part III: Serving Limited English Proficient (LEP) Persons – Overview (Section 2-III.A, page 2-18):**
 - Part retitled and rewritten to reflect EO 14224 (revoking EO 13166), OAG Memo 7/14/25 and FHEO Memo 9/19/25. Four-factor analysis removed. New HAS policy: communications generally in English; families encouraged to bring an advocate/adult representative; HAS will use bilingual staff, community volunteers, and responsible AI/machine translation.
- **Oral Interpretation; Written Translation; Implementation Plan (Former Sections 2-III.B, 2-III.C and 2-III.D, page 2-20):**
 - Sections 2-III.B, 2-III.C and 2-III.D deleted in their entirety.

Chapter 3 – Eligibility

- **Chapter 3 Introduction (page 3-1):**
 - Adds two eligibility requirements: family must not be receiving a duplicative subsidy and must meet the net asset and real property ownership restrictions; Part III now also covers the HCV asset limitation.
- **Family and Household (Section 3-I.B, page 3-3):**
 - Citations updated (24 CFR 5.403, 5.100; FR Notice 2/14/23). Definition of family adds “displaced person” and eligible youth ages 18-24 who have left or are leaving foster care and are homeless or at risk of homelessness.
- **Family Breakup and Remaining Member of Tenant Family (Section 3-I.C, page 3-5):**
 - “Human trafficking” added to the list of VAWA-protected circumstances.
- **Spouse, Cohead, and Other Adult (Section 3-I.E, page 3-6):**
 - HAS policy clarifies a marriage partner includes a partner in a “common law” marriage as defined by state law.
- **Dependent (Section 3-I.F, page 3-7):**
 - Adds definition of a minor (family member other than head or spouse under age 18).
- **Foster Children and Foster Adults (Section 3-I.K, page 3-9):**
 - Adds HOTMA definitions of foster adult and foster child [24 CFR 5.603]; states they may live in the unit with housing authority permission and that refusing a foster child may violate the Fair Housing Act; space standard reference changed to Section 8-I.F.
- **Live-In Aide (Section 3-I.M, page 3-12):**
 - Request may be made orally or in writing; verification from a knowledgeable professional not required when the disability-related need is apparent or known; new written request at annual reexamination “may be required” rather than “must.”
- **Income Eligibility and Targeting (Section 3-II.A, page 3-13):**
 - Income and net family assets of household members (non-family) are excluded for income eligibility; adds VASH low-income eligibility [FR Notice 8/13/24] with reference to Chapter 19.
- **Citizenship or Eligible Immigration Status (Section 3-II.B, page 3-16):**
 - Each family member regardless of age must declare status; declarations for minors signed by a responsible adult residing in the unit; declarations made under penalty of perjury; members who do not sign or document status are ineligible; LEP notice language removed; adds HUD Secretary Letter 12/16/25 provisions encouraging proof of citizenship and requiring quarterly reporting to DHS of individuals formally found not lawfully present.
- **Social Security Numbers (Section 3-II.C, page 3-20):**
 - Paragraph on participants who had not previously disclosed an SSN removed.
- **Family Consent to Release of Information (Section 3-II.D, page 3-21):**
 - Form HUD-9886-A and form HUD-52675 (Debts Owed) required; consent remains effective until denial, termination, or written revocation; HAS policy: revocation of consent to access financial records will result in denial of admission.
- **EIV System Searches (new section) (Section 3-II.F, page 3-27):**
 - New section requiring the EIV Existing Tenant Search and Debts Owed to PHAs and Terminations search before admission, and EIV Income Report review within 120 days of admission. HAS policy: confirm move-out with the other PHA/owner before approving assistance; each adult signs form HUD-52675 at eligibility and before being added to the household.

- **Overview (Denial of Assistance) (Section 3-III.A, page 3-29):**
 - Cites 24 CFR 982.552/982.553; adds that PHAs should safeguard due process rights; removes prior HUD/OGC guidance language on use of arrest records and criminal history.
- **Mandatory Denial of Assistance (Section 3-III.B, page 3-31):**
 - Adds two mandatory denial grounds: failure to sign and submit consent forms, and failure to meet the net asset and real property restrictions (24 CFR 5.618).
- **Restriction on Assistance Based on Assets (new section) (Section 3-III.C, page 3-32):**
 - New HOTMA section: assistance may not be provided if net family assets exceed the HUD-published asset limit or the family owns real property suitable for occupancy, with listed exceptions (jointly owned property, property offered for sale, VAWA victims, etc.). HAS policies define “not sufficient for the size of the family” (overcrowded under Chapter 8 space standards) and “geographic hardship.”
- **Other Permitted Reasons for Denial of Assistance (renumbered from 3-III.C) (Section 3-III.D, page 3-34):**
 - When denying for debts shown in EIV, HAS will give the family the EIV Debts Owed report and consider any dispute documentation before issuing the denial notice.
- **Screening (renumbered from 3-III.D) (Section 3-III.E, page 3-38):**
 - Criminal background checks through a third-party vendor for every adult household member (vendor name removed); applicants must list all states of residence; inaccurate application responses are cause for denial [Notice PIH 2021-28].
- **Criteria for Deciding to Deny Assistance (renumbered from 3-III.E) (Section 3-III.F, page 3-40):**
 - Arrest record language revised: HAS may obtain the police report and consider the circumstances of the arrest; “human trafficking” added.
- **Notice of Eligibility or Denial (renumbered from 3-III.F) (Section 3-III.G, page 3-43):**
 - Cross-references updated; “human trafficking” added.
- **Prohibition Against Denial of Assistance to Victims of Domestic Violence, Dating Violence, Sexual Assault, Human Trafficking, and Stalking (renumbered from 3-III.G) (Section 3-III.H, page 3-44):**
 - “Human trafficking” added to title and throughout, with explanation of HUD’s usage since 2022; reference to “VAWA 2013” generalized to VAWA.

Chapter 4 – Applications, Waiting List and Tenant Selection

- **Applying for Assistance (Section 4-I.B, page 4-3):**
 - HAS policy: waiting list opening/closing posted on www.savannahpha.com; applications submitted online; applicants use the online applicant portal.
- **Accessibility of the Application Process (Section 4-I.C, page 4-5):**
 - Limited English Proficiency subsection and LEP references removed.
- **Placement on the Waiting List (Section 4-I.D, page 4-6):**
 - Applicants placed by claimed preference(s) and date/time of application; adds lottery option (random number assignment, ordered by number and preferences).
- **Organization of the Waiting List (Section 4-II.B, page 4-8):**
 - PBV waiting list project list updated: Sustainable Fellwood Phases 1 and 2 and Ashley Midtown (RAD) removed.

- **Opening and Closing the Waiting List (Section 4-II.C, page 4-10):**
 - Public notice outlets to be determined at each opening and will include newspapers of general circulation, minority media and other outlets; Savannah Morning News added, Savannah Tribune removed.
- **Updating the Waiting List (Section 4-II.F, page 4-12):**
 - Reinstatement after non-response extended to circumstances resulting from a family member's disability or status as a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking.
- **The Application Interview (Section 4-III.E, page 4-18):**
 - All-adults attendance requirement replaced: head of household or spouse/cohead may attend for the family; verification for absent adults starts when signed releases are returned; SSN waiting-list retention language removed; LEP translation language replaced with the new language-assistance policy.

Chapter 5 – Briefings and Voucher Issuance

- **Briefing (Section 5-I.B, page 5-2):**
 - LEP interpretation requirements replaced with the new language-assistance policy; welfare-to-work voucher items removed; briefing packet contents updated per 24 CFR 982.301(b) (subsidy standard exceptions, Section 504 coordinator contact, reasonable accommodation information including exception payment standards, accessible unit listing, lead-based paint pamphlet, advantages of low-poverty areas); HAS additional packet materials now include grounds for termination and requirements for reporting income/family composition changes.
- **Family Obligations (Section 5-I.C, page 5-9):**
 - Family “may be held” responsible for a breach of housing quality standards caused by the family; damages standard tied to state law/court practice; VAWA incidents (including human trafficking) not construed as serious or repeated lease violations.
- **Determining Family Unit (Voucher) Size (Section 5-II.B, page 5-14):**
 - Space reference changed to 24 CFR 5.703; HAS policy on foster children/adults added (one additional bedroom when required by the placement agency); 6-bedroom row removed from the subsidy standard chart.
- **Voucher Issuance (Section 5-II.D, page 5-17):**
 - Voucher must be issued within 60 days of the eligibility determination; income documentation must be dated within 120 days of receipt (fixed-income sources within the benefit year).
- **Voucher Term and Extensions (Section 5-II.E, page 5-18):**
 - Expired-voucher families may reapply when the waiting list is open to be placed on the list (“without penalty” removed).

Chapter 6 – Income and Subsidy Determinations

- **Chapter 6 Introduction (page 6-1):**
 - States the chapter applies upon the HOTMA 102/104 compliance date; chapter reorganized from three parts to four (new Part II: Assets; Adjusted Income becomes Part III; Calculating Family Share and Subsidy becomes Part IV); permissive deductions referenced.
- **Overview (Section 6-I.A, page 6-2):**
 - Definition of annual income rewritten to the HOTMA definition at 24 CFR 5.609: all income is included unless specifically excluded; imputed asset income applies only above the HUD-

published threshold; income is based on amounts actually received; gross amounts used when income is garnished. Exhibits renumbered.

- **Household Composition and Income (Section 6-I.B, page 6-4):**
 - Regulatory citations updated to 24 CFR 5.609(b); full-time student earned income excluded in excess of the dependent deduction (replacing \$480); temporarily absent family member language revised; other credible documentation accepted for joint-custody determinations.
- **Calculating Annual Income (formerly Anticipating Annual Income) (Section 6-I.C, page 6-8):**
 - Retitled and rewritten: anticipated (current) income used at admission and interim reexamination; at annual reexamination the prior 12 months' income is used with adjustments for current income; income from assets is always anticipated; prior EIV/pay stub projection policy language removed.
- **Earned Income (Section 6-I.D, page 6-11):**
 - Rewritten for HOTMA: adds definitions of earned income, day laborer and seasonal worker (income included); minors' earned income excluded; dependent full-time student earnings above the dependent deduction excluded; lists of temporary/sporadic income, live-in aide income and federal program earnings removed (relocated to exclusions).
- **Earned Income Disallowance for Persons with Disabilities (Former Section 6-I.E, page 6-16):**
 - Section deleted in its entirety (EID eliminated under HOTMA).
- **Business and Self-Employment Income (renumbered from 6-I.F) (Section 6-I.E, page 6-19):**
 - Adds definitions of net and gross income; new language on independent contractors/"gig workers" (income included) and on assets owned by a business entity.
- **Student Financial Assistance (renumbered from 6-I.L) (Section 6-I.F, page 6-21):**
 - Rewritten for HOTMA: Title IV HEA assistance excluded; other assistance counted only to the extent it exceeds actual covered costs; prior 2005-law/Notice PIH 2015-21 text removed.
- **Periodic Payments (renumbered from 6-I.H) (Section 6-I.G, page 6-29):**
 - Rewritten: nonrecurring income and workers' compensation excluded; deferred SSI/Social Security/VA lump sums excluded; retirement account distributions counted when received; Social Security gross benefit and COLA rules; alimony/child support based on amounts received. HAS policies added on delayed-start lump sums, SSA overpayment withholding, and a three-month/12-month look-back for child support.
- **Nonrecurring Income (new section) (Section 6-I.H, page 6-34):**
 - New section defining nonrecurring income excluded from annual income (e.g., one-time payments, prevention, Census employment, stimulus payments, tax refunds); independent contractor, day laborer and seasonal income are not nonrecurring.
- **Welfare Assistance (renumbered from 6-I.J) (Section 6-I.I, page 6-35):**
 - Renumbered; exhibit reference updated to Exhibit 6-3.
- **State Payments to Allow Individuals with Disabilities to Live at Home (new section) (Section 6-I.J, page 6-36):**
 - New section excluding state Medicaid/agency payments for caregiving that enables a disabled family member to remain in the assisted unit.
- **Civil Rights Settlements (new section) (Section 6-I.K, page 6-36):**
 - New section excluding civil rights settlements and judgments (including back pay) from annual income; amounts retained count toward net family assets.
- **Additional Exclusions from Annual Income (renumbered from 6-I.M) (Section 6-I.L, page 6-37):**
 - List of exclusions replaced with the HOTMA list at 24 CFR 5.609(b) and the federally mandated exclusions published in FR Notice 1/31/2024 (foster/kinship care payments, insurance

settlements, Coverdell/529 and “baby bond” accounts, ABLE accounts, tribal trust settlements, etc.).

- **Part II: Assets (new Part) – Overview (formerly 6-I.G. Assets) (Section 6-II.A, page 6-48):**
 - New Part II created for assets. Overview rewritten income from assets is always anticipated and counted even when the asset is excluded from net family assets; statement that there is no asset limitation in the HCV program removed, with references to the asset limitation policies in Chapters 3 and 12.
- **Assets Disposed of for Less Than Fair Market Value (new section number) (Section 6-II.B, page 6-49):**
 - Restated under 24 CFR 5.603(b)(2): assets disposed of for less than fair market value in the prior two years are counted; transfers to retirement accounts are not; family must certify; negative equity does not justify excluding an asset. Prior “Valuing Assets” discussion removed.
- **Asset Inclusions and Exclusions (new section) (Section 6-II.C, page 6-52):**
 - New HOTMA section: necessary vs. non-necessary personal property; non-necessary personal property (bank accounts, investments) counted only when combined value exceeds the HUD-published threshold; ABLE accounts; lump-sum additions; revocable and irrevocable trusts; life insurance; federal tax refunds excluded for 12 months. HAS policies: family’s estimate used to value non-financial personal property (appraisal if believed off by \$50 or more); reinvested interest/dividends counted as actual income. Prior asset-type discussion (equity in real property, nonrevocable trusts, etc.) removed.
- **Determining Income from Assets (new section) (Section 6-II.D, page 6-63):**
 - New section defining net family assets and how actual and imputed asset income are calculated under Notice PIH 2023-27, with HAS policy on reasonable costs of disposing of an asset.
- **Payments in Lieu of Earnings; Welfare Assistance; Periodic and Determinable Allowances; Additional Exclusions (Former Sections 6-I.I, 6-I.J, 6-I.K and 6-I.M, page 6-65):**
 - Former sections deleted; content replaced by the reorganized HOTMA sections in Part I.
- **Part III: Adjusted Income – Introduction (renumbered from Part II) (Section 6-III.A, page 6-73):**
 - Dependent deduction changed from \$480 to \$525 and elderly/disabled family deduction from \$400 to \$575 (both adjusted annually by HUD); medical/disability expense threshold raised from 3 percent to 10 percent of annual income; permissive deductions referenced; guidance on anticipating health and medical care expenses added.
- **Dependent Deduction (Section 6-III.B, page 6-74):**
 - Deduction increased from \$480 to \$525, adjusted annually by HUD for inflation.
- **Elderly or Disabled Family Deduction (Section 6-III.C, page 6-74):**
 - Deduction increased from \$400 to \$575, adjusted annually by HUD for inflation.
- **Health and Medical Care Expenses Deduction (retitled) (Section 6-III.D, page 6-75):**
 - Retitled; threshold raised from 3 percent to 10 percent of annual income; HUD’s new definition of health and medical care expenses adopted; HAS will use IRS Publication 502 as a standard only where consistent with HUD’s definition; service animal costs clarified; HAS will redact PII and immediately dispose of diagnosis/treatment information.
- **Disability Assistance Expenses Deduction (Section 6-III.E, page 6-77):**
 - Threshold raised from 3 percent to 10 percent; examples of eligible auxiliary apparatus and attendant care added per Notice PIH 2023-27.
- **Child Care Expense Deduction (Section 6-III.F, page 6-79):**
 - Reference to the earned income disallowance (EID) removed.

- **Hardship Exemptions (new section) (Section 6-III.G, page 6-83):**
 - New HOTMA section: phased-in relief (5 percent, then 7.5 percent, then 10 percent threshold over 24 months) and general hardship relief for health/medical and disability expenses, and a child care expense hardship exemption. HAS policies: written request required; determination within 30 calendar days and written notice within 10 business days; 90-day extensions; hearing rights on denial.
- **Permissive Deductions (new section) (Section 6-III.H, page 6-89):**
 - New section describing optional permissive deductions; HAS policy: the housing authority has opted not to use permissive deductions.
- **Part IV: Calculating Family Share and PHA Subsidy – Overview (renumbered from Part III) (Section 6-IV.A, page 6-91):**
 - Part renumbered; requirement that income be verified no earlier than 60 days before voucher issuance removed.
- **Financial Hardships Affecting Minimum Rent (Section 6-IV.B, page 6-93):**
 - Housing Authority of Savannah policy statement inserted at the start of the section regarding the housing authority's \$50 minimum rent and the applicability of the financial hardship rules.
- **Applying Payment Standards (Section 6-IV.C, page 6-96):**
 - Updated for 24 CFR 982.505(c) and Notice PIH 2024-34: decreases may not be applied earlier than two years after the effective date and require 12 months' written notice; increases applied no later than the earliest of a rent increase, the first regular or interim reexamination, or one year. HAS policies: no early adoption of increases; new unit size applied at first regular reexamination; current payment standard used on moves/new HAP contracts; reasonable accommodation payment standards up to 120 percent of FMR without HUD approval.
- **Applying Utility Allowances (Section 6-IV.D, page 6-100):**
 - Adds flat-fee utility option (HAS policy: will not base utility allowances on owner flat fees) and PBV site-specific utility allowance provisions; "Individual Relief" added to reasonable accommodation heading.
- **Annual Income Full Definition; Treatment of Family Assets; Effect of Welfare Benefit Reduction (Exhibits 6-1 to 6-3, page 6-102):**
 - Exhibits replaced with current regulatory text (24 CFR 5.609, 5.603(b), 5.615). Former Exhibits 6-1 through 6-5 (Income Inclusions, Income Exclusions, Family Assets, Earned Income Disallowance, Welfare Benefit Reduction) deleted.

Chapter 7 – Verification

- **Chapter 7 Introduction (page 7-1):**
 - States the chapter applies upon the HOTMA 102/104 compliance date; verification guidance now follows Notice PIH 2023-27 (replacing Notice PIH 2018-18).
- **Family Consent to Release of Information (Section 7-I.A, page 7-1):**
 - Rewritten for form HUD-9886-A, which is signed once at admission (no longer at each annual reexamination) and again only when a member turns 18 or an adult join. HAS policies: adult members asked to consent to sharing EIV income information with the head of household; members turning 18 must sign within 10 business days; revocation of consent to access financial records will result in denial of admission or termination of assistance.
- **Use of Other Programs' Income Determinations (new section; replaces Overview of Verification Requirements) (Section 7-I.B, page 7-6):**
 - New "Safe Harbor" section allowing use of income determinations made within the prior 12 months by means-tested federal programs (TANF, Medicaid, SNAP, etc.). HAS policy: will accept

Safe Harbor determinations at annual reexamination when available, while still requiring third-party verification of deductions.

- **Streamlined Income Determinations (new section; replaces Up-Front Income Verification) (Section 7-I.C, page 7-10):**
 - New section on streamlined determinations for fixed-income sources. HAS policy: when a Safe Harbor determination is not used, third-party verification will be obtained per Notice PIH 2023-27.
- **Verification Hierarchy (new section; replaces Third-Party Written and Oral Verification) (Section 7-I.D, page 7-14):**
 - New section adopting HUD's six-level verification hierarchy under Notice PIH 2023-27.
- **Level 5 and 6 Verifications: Up-Front Income Verification (new section; replaces Self-Certification) (Section 7-I.E, page 7-18):**
 - New section on UIV/EIV use. HAS policies: EIV Income Report pulled within 120 days of each annual reexamination; New Hires Report reviewed at annual reexamination; No Income Reported and Identity Verification reports monitored; Deceased Tenants Report reviewed monthly with end of participation set as the last day of the month of death; applicants and participants informed of UIV sources (EIV, Work Number).
- **Level 4 Verification (new section) (Section 7-I.F, page 7-24):**
 - New section on EIV + self-certification and written third-party verification from the source (documents generally dated within 120 days). HAS policy identifies when each method is used (annual reexamination, new admissions, interim reexaminations).
- **Level 3 Verification: Written, Third-Party Form (new section) (Section 7-I.G, page 7-28):**
 - New section on PHA-generated third-party forms. HAS policies: if forms are not returned within 10 business days, self-certification accepted without oral verification; HAS pays verification service charges; self-certification accepted for assets disposed of for less than fair market value.
- **Level 2: Oral Third-Party Verification (new section) (Section 7-I.H, page 7-28):**
 - New section describing oral third-party verification under Notice PIH 2023-27.
- **Level 1: Non-Third-Party Verification: Self-Certification (new section) (Section 7-I.I, page 7-30):**
 - New section listing when self-certification is acceptable (fully excluded income, net assets at or below the HUD threshold, no real property ownership, zero income, nonrecurring income); HAS policy on format of self-certifications.
- **Social Security Numbers (Section 7-II.B, page 7-35):**
 - Citation updated to Notice PIH 2023-27; adds option to accept self-certification plus a third-party document showing the applicant's name; HAS policy: used only as a last resort.
- **Family Relationships (Section 7-II.D, page 7-38):**
 - Minor wording addition regarding documentation that a person is no longer a family member.
- **Citizenship or Eligible Immigration Status (Section 7-II.G, page 7-43):**
 - Adds HUD Secretary Letter 12/16/25: family members under 62 claiming eligible immigration status must provide USCIS-accepted documentation and sign a consent form; status verified through the SAVE system, with reference to new Exhibit 7-2.
- **Verifying Income and Assets (Part III Introduction, page 7-46):**
 - HAS policy added: because HAS uses Safe Harbor verifications, the Part III verification policies apply only when Safe Harbor documentation is not accepted, unavailable, or disputed, or when employment income must be verified to cap childcare/disability expenses.

- **Earned Income (Section 7-III.A, page 7-46):**
 - Family must provide originals of the two most current, consecutive pay stubs (previously a minimum of two and maximum of four).
- **Business and Self-Employment Income (Section 7-III.B, page 7-46):**
 - Requires income tax returns with schedules and proof of transmission (audited financial statement requirement removed); IRS Form 4506-T for those who do not file; new verification for “gig employment” income.
- **Periodic Payments and Payments in Lieu of Earnings (Section 7-III.C, page 7-48):**
 - Social Security/SSI verification rewritten per Notice PIH 2023-27 (benefit letter for applicants; EIV for participants); prior 60-day benefit letter policy removed.
- **Alimony or Child Support (Section 7-III.D, page 7-50):**
 - Income based on amounts received; verification look-back changed from 60 days to 12 months; prior requirements for irregular/no payments removed.
- **Nonrecurring Income (new section) (Section 7-III.E, page 7-50):**
 - New section; HAS will accept the family’s self-certification that income will not be repeated, with third-party verification case by case.
- **Assets and Income from Assets (replaces former 7-III.E) (Section 7-III.F, page 7-51):**
 - Rewritten for HOTMA. HAS policies: will not accept self-certification of asset value/asset income – third-party verification of net family assets required every year; will accept self-certification that the family has no present ownership in real property, signed by all adult members.
- **Net Income from Rental Property (renumbered from 7-III.F) (Section 7-III.G, page 7-53):**
 - Renumbered only.
- **Federal Tax Refunds or Refundable Tax Credits (new section) (Section 7-III.H, page 7-53):**
 - New section: refund amounts need not be verified when net assets are at or below the HUD threshold.
- **Retirement Accounts (replaces former 7-III.G) (Section 7-III.I, page 7-54):**
 - HAS policy simplified: accept an original document from the account holder dated within 12 months showing distributions, lump sums and regular payments.
- **Income from Excluded Sources (renumbered from 7-III.H) (Section 7-III.J, page 7-55):**
 - Definitions of fully and partially excluded income updated to 24 CFR 5.609(b).
- **Zero Income Families (replaces former 7-III.I) (Section 7-III.K, page 7-56):**
 - New HOTMA language; HAS will check UIV/third-party sources and require each member claiming zero income to complete a zero-income form.
- **Student Financial Assistance (replaces former 7-III.J) (Section 7-III.L, page 7-59):**
 - Rewritten for the two HOTMA categories of student financial assistance; HAS will request written third-party verification of source and amount.
- **Parental Income of Students Subject to Eligibility Restrictions (renumbered from 7-III.K) (Section 7-III.M, page 7-61):**
 - Renumbered only.
- **Health and Medical Care Expense Deduction (retitled) (Section 7-IV.B, page 7-63):**
 - Retitled; adds HIPAA/Privacy Act compliance, limits on documentation requested, and PII redaction/disposal of diagnosis information; expense projection language tied to new admissions and interims.
- **Disability Assistance Expenses (Section 7-IV.C, page 7-66):**
 - Adds HIPAA/Privacy Act compliance and PII redaction/disposal policy; cross-references updated.

- **Child Care Expenses (Section 7-IV.D, page 7-69):**
 - Child eligibility restated as “under the age of 13”; cross-references updated.
- **SAVE System Responses and Section 214 Eligibility for HUD Assistance (new exhibit) (Exhibit 7-2, page 7-73):**
 - New exhibit listing SAVE responses that are eligible/ineligible for assistance [HUD Secretary Letter 12/16/25].

Chapter 8.A – Housing Quality Standards and Rent Reasonableness Determinations (HQS)

- **Chapter 8.A Introduction (page 8-1):**
 - Existing Chapter 8 redesignated Chapter 8.A. States that units must comply with HUD’s NSPIRE standards no later than February 1, 2027, and that HQS may be used until then; adds explanation of how “HQS” and “housing quality standards” are used.
- **General HUD Requirements (Section 8-I.A, page 8-3):**
 - Smoke detectors removed from the HQS performance list; new subsection on NSPIRE standards that already apply under HQS (carbon monoxide detectors, smoke alarms, lead-based paint visual assessment); HAS policy: owners intending to use a restoration agreement or escrow account must submit it to the housing authority for review.
- **Owner and Family Responsibilities (Section 8-I.D, page 8-13):**
 - Rewritten per 24 CFR 982.404: owner obligation defined; HAS will waive owner responsibility for tenant-caused deficiencies; family must correct life-threatening deficiencies within 24 hours and others within 30 calendar days; damages standard tied to state security deposit law.
- **Overview (Inspection Process) (Section 8-II.A, page 8-16):**
 - Inspection types renamed (Periodic, Interim, Supervisory Quality Control); PHA-owned unit inspection language updated (independent entity; family informed of right to select any unit); reinspection fee language updated [24 CFR 5.705(h)].
- **Initial HQS Inspection (Section 8-II.B, page 8-22):**
 - Describes the non-life-threatening (NLT) and alternative inspection options. HAS policy: will not use the NLT option – all units must pass the initial inspection on or before the HAP contract effective date – and will not rely on alternative inspections.
- **Periodic HQS Inspections (formerly Annual/Biennial) (Section 8-II.C, page 8-26):**
 - Retitled; citation updated.
- **Interim Inspections (formerly Special) (Section 8-II.D, page 8-26):**
 - Retitled; life-threatening reports inspected within 24 hours and repaired within 24 hours of notice; non-life-threatening reports inspected within 15 days and repaired within 30 days.
- **Supervisory Quality Control Inspections (Section 8-II.E, page 8-28):**
 - Retitled; citation to 24 CFR 985.3(e) added.
- **Inspection Results and Reinspections for Units Under HAP Contract (Section 8-II.F, page 8-28):**
 - Adds HAP withholding and abatement provisions per 24 CFR 982.404(d); HAS policy: will not accept self-certification of repairs.
- **Enforcing Owner Compliance (Section 8-II.G, page 8-31):**
 - HAP abatement rewritten: if not corrected within 60 days of abatement the HAP contract terminates and the family is issued a voucher at least 30 days before termination; owner may not terminate tenancy because of withholding/abatement.

- **Enforcing Family Compliance with HQS (Section 8-II.H, page 8-33):**
 - Family responsible for deficiencies where owner responsibility was waived; failure to correct results in termination; owner may enter into a repayment agreement with the family for repairs.
- **When Rent Reasonableness Determinations Are Required (Section 8-III.B, page 8-35):**
 - Removed statement that rent increases will not be approved until failed inspection items are corrected.
- **How Comparability Is Established / Rent Reasonableness Methodology (Section 8-III.C, page 8-36):**
 - Reference to the contracted inspection company and the unit-to-unit comparison description removed; HAS will collect and maintain market rent data; adds guidance on adjustments and rent concessions.

Chapter 8.B – National Standards for the Physical Inspection of Real Estate (NSPIRE) and Rent Reasonableness Determinations (New Chapter)

- **Chapter 8.B Introduction (page 8-1):**
 - New chapter adopting HUD’s NSPIRE standards [24 CFR 5 Subpart G; Notice PIH 2024-26, REV-1], which units must meet no later than February 1, 2027. Units must pass inspection before lease approval and at least once every 24 months. Chapter organized in three parts: NSPIRE Standards, the Inspection Process, and Rent Reasonableness.
- **Inspectable Areas (Section 8-I.A, page 8-3):**
 - Defines NSPIRE inspectable areas (unit, inside, outside), limited to assisted units and the common/exterior areas serving them.
- **Affirmative Habitability Requirements (Section 8-I.B, page 8-3):**
 - Minimum habitability requirements for each inspectable area (listed in Exhibit 8-1); areas must be free of health and safety hazards.
- **Modifications to Provide Accessibility (Section 8-I.C, page 8-4):**
 - Owner obligations for reasonable modifications; HAS policy: restoration agreements or escrow accounts must be submitted to the housing authority for review.
- **Additional Local Requirements (Section 8-I.D, page 8-5):**
 - HUD approval required for variations; HAS policy: no HUD-approved variations to NSPIRE standards have been requested.
- **Life-Threatening Deficiencies (Section 8-I.E, page 8-6):**
 - Lists NSPIRE life-threatening deficiencies that must be corrected within 24 hours. HAS policy adds: utilities not in service, including no running hot water.
- **Owner and Family Responsibilities (Section 8-I.F, page 8-9):**
 - Owner must maintain the unit to housing quality standards; HAS will waive owner responsibility for tenant-caused deficiencies, which the family must correct.
- **Lead-Based Paint (Section 8-I.G, page 8-11):**
 - Compliance with 24 CFR Part 35 Subparts M and H for lead-based paint hazards.
- **Violation of Space Standards (Section 8-I.H, page 8-12):**
 - At least one bedroom or living/sleeping room for each two persons.
- **Overview (Inspection Process) (Section 8-II.A, page 8-13):**
 - Describes initial, periodic, interim and supervisory quality control inspections. HAS policies: no fee for failed reinspections; remote video inspections (RVIs) may be used except in pre-1978

units where a child under six will reside; at least 48 hours' notice; inspections between 7:00 a.m. and 7:00 p.m.; an authorized adult must be present.

- **Initial Inspection (Section 8-II.B, page 8-17):**
 - HAS will not use the non-life-threatening (NLT) option or alternative inspections; units must pass before the HAP contract effective date; initial inspection completed within 15 days of the RTA; reinspection within five business days of owner notice; utilities must be on for testing.
- **Periodic Inspections (Section 8-II.C, page 8-20):**
 - HAS policy: each unit inspected biennially (within 24 months of the last full inspection); HAS may require annual inspections of any unit or owner.
- **Interim Inspections (Section 8-II.D, page 8-20):**
 - Life-threatening reports inspected within 24 hours; non-life-threatening within 15 days.
- **Supervisory Quality Control Inspections (Section 8-II.E, page 8-22):**
 - Supervisor inspections of a sample of units to ensure consistent application of NSPIRE standards.
- **Inspection Results and Reinspections for Units Under HAP Contract (Section 8-II.F, page 8-22):**
 - NSPIRE deficiency ratings (life-threatening, severe, moderate, low); life-threatening corrected within 24 hours, severe/moderate within 30 days; low deficiencies do not fail the unit; extension and reinspection policies.
- **Enforcing Owner Compliance (Section 8-II.G, page 8-25):**
 - HAS will not withhold HAP upon notice of deficiencies; abatement effective the first of the month after the correction period; abated units reinspected within five business days; maximum abatement of 90 days before HAP contract termination.
- **Enforcing Family Compliance (Section 8-II.H, page 8-27):**
 - Family must correct family-caused deficiencies or face termination of assistance.
- **Part III: Rent Reasonableness (Overview; When Determinations Are Required; How Comparability Is Established) (Sections 8-III.A, 8-III.B and 8-III.C, page 8-28):**
 - Rent reasonableness policies restated for the NSPIRE chapter: determinations at initial occupancy and for rent adjustments; HAS maintains market rent data by bedroom size and market area and compares proposed rents to a range of comparable unassisted units.
- **Affirmative Habitability Requirements (Exhibit 8-1, page 8-34):**
 - New exhibit listing NSPIRE affirmative habitability requirements for inside, outside, and unit areas.

Chapter 9 – General Leasing Policies

- **Eligible Units (Section 9-I.D, page 9-5):**
 - “Decent, safe and sanitary” replaced with “safe and habitable condition” meeting applicable housing quality standards (see Chapter 8).
- **PHA Leasing Assistance for Families (new section) (Section 9-I.E, page 9-9):**
 - New section per Notice PIH 2022-18. HAS policy: will not use administrative fee reserves or ongoing administrative fees for security deposits, utility deposits, application fees, or holding fees.
- **HAP Contract Execution (Section 9-I.G, page 9-15):**
 - HAP contracts executed after 60 days are void unless HUD approves an extension for extenuating circumstances (request due within two weeks after the deadline).

Chapter 10 – Moving with Continued Assistance and Portability

- **Allowable Moves (Section 10-I.A, page 10-1):**
 - “Human trafficking” added to VAWA-related move provisions.
- **Family Moves Due to Unit Deficiencies (new section) (Section 10-I.B, page 10-3):**
 - New section: families may terminate tenancy during HAP abatement and must be issued a voucher; HAS will issue the voucher within 10 business days of approving the family’s written request.
- **Restrictions on Moves; Moving Process (renumbered from 10-I.B and 10-I.C) (Sections 10-I.C and 10-I.D, page 10-3):**
 - Renumbered; cross-reference updated.
- **Initial PHA Role (Section 10-II.B, page 10-8):**
 - When a move results from HAP termination for owner failure to repair, voucher issued at least 30 days before termination with an initial term of 120 calendar days; fax references removed; EID documentation removed and phased-in hardship exemption information added to portability documents; late-billing decision policy revised.
- **Receiving PHA Role (Section 10-II.C, page 10-15):**
 - HAS policy reversed: HAS will conduct a new reexamination of income and composition for incoming portable families (previously relied on the initial PHA’s information), without delaying voucher issuance or unit approval.

Chapter 11 – Reexaminations

- **Chapter 11 Introduction (page 11-1):**
 - States the chapter applies upon the HOTMA 102/104 compliance date; new Part III (Non-Interim Reexamination Transactions) added and Recalculating Family Share and Subsidy Amount becomes Part IV.
- **Overview (Section 11-I.A, page 11-1):**
 - At annual reexamination income is determined for the previous 12-month period (asset income always anticipated); Safe Harbor income verification option referenced; former 11-I.B. Streamlined Annual Reexaminations section deleted (moved to Chapter 7).
- **Scheduling Annual Reexaminations (renumbered from 11-I.C) (Section 11-I.B, page 11-3):**
 - Process begins 120 days before the effective date (previously 60-120); notification sent by U.S. mail and email with an invitation to the RentCafe Resident Portal; in-person interview process replaced with electronic recertification; a second notice is sent if not completed, and termination notice after two attempts.
- **Conducting Annual Reexaminations (renumbered from 11-I.D) (Section 11-I.C, page 11-5):**
 - Families submit required information electronically; missing items due within 10 business days; overcrowding language updated to “space standards” [24 CFR 982.403].
- **Determining Ongoing Eligibility of Certain Students (renumbered from 11-I.E) (Section 11-I.D, page 11-7):**
 - Renumbered; cross-references updated.
- **Calculating Annual Income at Annual Reexamination (new section) (Section 11-I.E, page 11-8):**
 - New HOTMA section describing use of prior 12-month income with adjustments for current income, and exceptions for streamlined and Safe Harbor determinations.

- **Overview (Interim Reexaminations) (Section 11-II.A, page 11-11):**
 - Rewritten per Notice PIH 2023-27: families may request an interim for any change; interims should generally be completed within 30 days of the PHA learning of the change.
- **Changes in Family and Household Composition (Section 11-II.B, page 11-11):**
 - All composition changes must be reported within 10 business days; interims conducted to add/remove members except within three months of the annual reexamination; earned income of an added member not counted until the next annual; foster child/adult policy and space-standard language updated; new unit size applied to the payment standard at the first regular reexamination.
- **Changes Affecting Income or Expenses (Section 11-II.C, page 11-16):**
 - Rewritten for HOTMA 10 percent thresholds. HAS policies: interim conducted for a decrease in adjusted income of any amount; no interim for increases in earned income; interim processed for unearned income increases of 10 percent or more; families must report all income changes within 10 business days.
- **Effective Dates (replaces Processing the Interim Reexamination) (Section 11-II.D, page 11-21):**
 - New effective-date rules: timely reported increases effective after 30 days' notice and decreases the first of the month after the change; untimely reported increases applied retroactively. HAS policy: untimely reported decreases effective the first of the month after the interim is completed, with retroactive relief case by case for extenuating circumstances.
- **Part III: Non-Interim Reexamination Transactions (Part III, page 11-24):**
 - New Part listing transactions reported to HUD on form HUD-50058 that are not interim reexaminations (e.g., hardship exemption changes, phased-in relief updates).
- **Changes in Payment Standards and Utility Allowances (Part renumbered from Part III to Part IV) (Section 11-III.B, page 11-25):**
 - Detailed payment standard timing rules removed and replaced with reference to Chapter 6 [FR Notice 5/7/24].
- **Calculating Income at Annual Reexamination (new exhibit) (Exhibit 11-1, page 11-28):**
 - New exhibit with worked examples of calculating annual income at annual reexamination.

Chapter 12 – Termination of Assistance and Tenancy

- **Mandatory Termination of Assistance (Section 12-I.D, page 12-2):**
 - HAS policy: assistance terminated if the family revokes consent to collect information from financial institutions; death of sole family member rewritten per Notice PIH 2026-11 (HAP ends the last day of the month of death; EOP 50058 within 60 days); family absence policy added (notice required for absences over 30 calendar days); “human trafficking” added.
- **Mandatory Policies and Other Authorized Terminations (Section 12-I.E, page 12-5):**
 - Arrest record sentences removed; eviction look-back for termination reduced from five years to three; adds termination for eviction due to repeated lease violations; FSS citation updated (24 CFR 984.101(d)); new Asset Limitation policy: HAS adopts total nonenforcement of the asset limitation for participants (applies only at admission); insufficient funding policy expanded with cost-saving actions and order of HAP contract terminations (longest-assisted families first, excluding elderly/disabled; special purpose vouchers last).
- **Terminations Related to Domestic Violence, Dating Violence, Sexual Assault or Stalking (Section 12-II.E, page 12-15):**
 - “Human trafficking” added throughout with explanation of HUD’s VAWA 2022 usage; VAWA protections text updated.

- **Termination Notice (Section 12-II.F, page 12-20):**
 - Adds requirement to provide notice of VAWA rights and form HUD-5382 with terminations; cross-references updated.
- **Grounds for Owner Termination of Tenancy (Section 12-III.B, page 12-21):**
 - “Human trafficking” added to VAWA-related provisions.
- **Statement of Family Obligations (Exhibit 12-1, page 12-25):**
 - Conforming edits (damages standard under state law/court practice; “human trafficking”).

Chapter 13 – Owners

- **Owner Recruitment and Retention (Section 13-I.A, page 13-2):**
 - “Recruitment” retitled “Education and Outreach” with added outreach strategies; local poverty-concentration narrative removed; new Owner Incentive/Retention Payments subsection (Notice PIH 2022-18) – HAS policy: will not provide owner incentive or retention payments.
- **Basic HCV Program Requirements (Section 13-I.B, page 13-6):**
 - Owner listing provided to families via www.affordablehousing.com.
- **Owner Responsibilities (Section 13-I.C, page 13-8):**
 - Adds definition of when a unit is not in compliance with housing quality standards; FR Notice 1/4/23 citation added.
- **Owner Qualifications (Section 13-I.D, page 13-9):**
 - Conflict-of-interest provision expanded (covered individuals and immediate family members, for one year thereafter); third-party agents must provide the current management agreement.
- **HAP Contract Term and Terminations (Section 13-II.E, page 13-18):**
 - “HQS” size requirement reference changed to NSPIRE standards; no HAP may be paid for any month after the month the family vacates.
- **Change in Ownership / Assignment of the HAP Contract (Section 13-II.F, page 13-20):**
 - When assignment documentation is received, no new lease or HAP contract is required; new owner is bound by the existing HAP contract.

Chapter 14 – Program Integrity

- **Detecting Errors and Program Abuse (Section 14-I.B, page 14-3):**
 - Audit citation updated to 2 CFR Part 200; audit threshold raised from \$500,000 to \$1,000,000 in federal awards.
- **PHA-Caused Errors or Program Abuse (Section 14-II.D, page 14-11):**
 - New De Minimis Errors provision (errors of \$30 or less per month in adjusted income); HAS will reimburse families for any overpayment of rent; prior “Repayment to the PHA” paragraph removed.

Chapter 15 – Special Housing Types

- **Chapter 15 Introduction (page 15-1):**
 - Adds New HCV Guidebook citation; HAS must permit a family to lease a manufactured home and space; housing quality standards apply to special housing types unless modified [Notice PIH 2023-28]; a unit cannot be designated as more than one special housing type and no preference may be given.
- **Single Room Occupancy – Overview (Section 15-I.A, page 15-3):**
 - HAP contract (form HUD-52641) must specify the special housing type in Part A.

- **SRO: Housing Quality Standards (Section 15-I.C, page 15-3):**
 - Retitled; sanitary facilities, space and security must meet local code standards for SRO housing, with listed standards applying where no local code exists.
- **Congregate Housing – Overview (Section 15-II.A, page 15-5):**
 - HAP contract must specify the special housing type in Part A.
- **Congregate: Housing Quality Standards (Section 15-II.C, page 15-5):**
 - Retitled; clarifies food preparation/kitchen exceptions; lead-based paint standards apply if a child under six is expected to reside in the unit.
- **Group Home – Overview (Section 15-III.A, page 15-6):**
 - HAP contract must specify the special housing type in Part A.
- **Group Home: Housing Quality Standards (Section 15-III.C, page 15-7):**
 - Clarifies which standards are modified; kitchen equipment requirements added; lead-based paint standards apply if a child under six is expected to reside in the unit.
- **Shared Housing – Overview (Section 15-IV.A, page 15-9):**
 - Expanded per Notice PIH 2021-05 (for-profit co-living, shared housing matching services). HAS policy: information on the shared housing option and known matching services provided at briefing and on request; HAS will work with local jurisdictions on fair housing barriers.
- **Shared Housing – Payment Standard, Utility Allowance and HAP Calculation (Section 15-IV.B, page 15-11):**
 - Pro rata payment standard example added; utility allowance is the pro rata share of the unit's allowance; new subsection on exception payment standards as a reasonable accommodation [Notice PIH 2025-12].
- **Shared Housing: Housing Quality Standards (Section 15-IV.C, page 15-12):**
 - Retitled; terminology updated.
- **Cooperative Housing – Overview (Section 15-V.A, page 15-13):**
 - Defines the monthly carrying charge and applies rent limits/reasonableness; HAP contract must specify the special housing type.
- **Cooperative: Housing Quality Standards (Section 15-V.C, page 15-13):**
 - Remedies in 24 CFR 982.404 do not apply; PHA may exercise all remedies regardless of whether the family or cooperative caused the breach.
- **Manufactured Homes – Payment Standard, Utility Allowance and HAP Calculation (Section 15-VI.C, page 15-16):**
 - Rent to owner for the space and eligible housing expenses redefined per 24 CFR 982.623(b); rent reasonableness language expanded.
- **Manufactured Homes: Housing Quality Standards (Section 15-VI.D, page 15-18):**
 - Tie-down requirement restated as a performance requirement and acceptability criteria.
- **Homeownership – Selection of Families (Section 15-VII.C, page 15-22):**
 - Families minimum FICO score revised from 620 to 640
- **Homeownership – Eligible Units (Section 15-VII.D, page 15-23):**
 - Adds provisions for contracts of sale on units not yet under construction (environmental review and completed construction/inspection required before assistance begins).
- **Homeownership – Home Inspections, Contract of Sale, and PHA Disapproval of Seller (Section 15-VII.G, page 15-27):**
 - States HAS will not conduct an HQS inspection while the family receives homeownership assistance; adds contract-of-sale requirements for units not yet under construction.

Chapter 16 – Program Administration

- **Payment Standards (Section 16-II.B, page 16-3):**
 - New Reasonable Accommodation subsection on exception payment standards [24 CFR 982.503(d)(5); Notices PIH 2025-12 and 2024-34]; payment standards must be revised within three months of the FMR effective date; HAS will post the payment standard schedule on its website and include it in briefing materials.
- **Utility Allowances (Section 16-II.C, page 16-9):**
 - Requires an area-wide utility allowance schedule; adds optional energy-efficient utility allowance (HAS policy: will not maintain one); reasonable accommodation and individual relief language updated.
- **Informal Reviews (Section 16-III.B, page 16-11):**
 - Terminology updated to housing quality/space standards; LEP requirements replaced with HAS policy that reviews are conducted in English with language assistance through AI, staff interpreters, machine translation, or a family-provided representative; remote review notice to state technology requirements.
- **Informal Hearings for Participants (Section 16-III.C, page 16-17):**
 - HAS will offer hearings for denial of reasonable accommodation requests and for certain FSS actions [24 CFR 984.303(i)]; same language-assistance policy as informal reviews; remote hearing packet procedures; hearsay evidence standard revised.
- **Repayment Policy (Section 16-IV.B, page 16-35):**
 - Adds collection alternatives for owner and family debts (collection agencies, small claims court, civil lawsuit, state income tax set-off) and criminal prosecution referral language; citations updated to Notice PIH 2018-18; repayment agreements must be written, dated and signed with amounts stated.
- **Record Retention (Section 16-VI.B, page 16-45):**
 - Adds three-year retention of form HUD-50058 and EIV Income Reports from the end of participation; HAS will keep fair housing and VAWA complaint records for at least three years; “human trafficking” added.
- **Records Management (Section 16-VI.C, page 16-47):**
 - Form HUD-9886-A referenced; diagnosis/treatment information received will be immediately disposed of and never kept in the file.
- **Determination of Insufficient Funding – Overview (Section 16-VIII.A, page 16-51):**
 - Adds requirement to identify factors for deciding which HAP contracts to terminate first (see Chapter 12).
- **VAWA – Overview (Section 16-IX.A, page 16-52):**
 - “Human trafficking” added with explanation of HUD’s VAWA 2022 usage.
- **VAWA – Definitions (Section 16-IX.B, page 16-52):**
 - Definitions updated for VAWA 2022: affiliated person, expanded definition of domestic violence (including economic and technological abuse), technological abuse, and victim.
- **VAWA – Documentation (Section 16-IX.D, page 16-58):**
 - Adds that tenants cannot be required to document victim status other than as stated in the Notice of Occupancy Rights.
- **VAWA Forms and Notices (Exhibits 16-1 to 16-5, page 16-62):**
 - Exhibits 16-1 (Notice of Occupancy Rights, HUD-5380), 16-2 (Certification, HUD-5382), 16-3 (Emergency Transfer Plan) and 16-4 (Emergency Transfer Request, HUD-5383) replaced with

current HUD versions; new Exhibit 16-5, Model Owner Notification of Rights and Obligations, added.

Chapter 17 – Project-Based Vouchers

- **Chapter 17 Introduction (page 17-1):**
 - Part descriptions updated to reflect the reorganized chapter (program cap and project cap moved to Part I; occupancy cap exception text removed).
- **Overview (Section 17-I.A, page 17-2):**
 - Rewritten for the HOTMA Voucher Final Rule: 20 percent program cap plus an additional 10 percent for qualifying units; HUD notification requirements; new Public Housing Repositioning subsection – HAS policy notes HAS administers PBV units developed through repositioning, including RAD (see Chapter 18). Outdated FR Notice 1/18/17 and Notice PIH 2017-21 text removed.
- **PBV Definitions (new section) (Section 17-I.B, page 17-4):**
 - New section defining PBV terms under 24 CFR 983.3 (excepted units, excluded units, existing housing, newly constructed and rehabilitated housing, project, etc.); HAS will not limit the definition of “project.”
- **Maximum Number of PBV Units (Percentage Limitation) (new section) (Section 17-I.C, page 17-7):**
 - New section on the program cap. HAS policy: HAS will project-base up to an additional 10 percent of authorized units (up to 30 percent in total) as permitted by HUD.
- **Cap on Number of PBV Units in Each Project (new section; moved from 17-II.F) (Section 17-I.D, page 17-9):**
 - Project cap of the greater of 25 units or 25 percent (40 percent in areas where vouchers are difficult to use). HAS policies: excepted units limited to units for elderly families; units continue to count when a family no longer qualifies for reasons beyond its control.
- **Units Not Subject to the PBV Program Cap or Project Cap (new section) (Section 17-I.E, page 17-11):**
 - New section describing excluded units (e.g., former public housing and other HUD-assisted units) that do not count toward the program cap or project cap. HAS policy language is added to list the projects with excluded units; no projects are listed in the red line copy.
- **PHA-Owned Units (new section) (Section 17-I.F, page 17-13):**
 - Independent entity must set rents and inspect PHA-owned units. HAS policy: HAS may select projects it owns or controls and will obtain HUD approval of McCright & Associates LLC as the independent entity.
- **Tenant-Based vs. Project-Based Voucher Assistance; Relocation Requirements; Equal Opportunity Requirements (renumbered from 17-I.B, 17-I.C, 17-I.D) (Sections 17-I.G, 17-I.H and 17-I.I, page 17-14):**
 - Sections renumbered with no substantive change.
- **Part II: Proposals and Project Selection – Overview (Section 17-II.A, page 17-21):**
 - Part II retitled and fully reorganized; overview rewritten to cover both competitive and noncompetitive selection [24 CFR 983.10(b)(3), 983.51].
- **Competitive Selection of Proposals (replaces Owner Proposal Selection Procedures) (Section 17-II.B, page 17-22):**
 - Competitive selection procedures restated under 24 CFR 983.51(b), including HAS RFP advertising (newspapers of general circulation and HAS website) and rating/ranking procedures.

- **Non-Competitive Project Selection (new section) (Section 17-II.C, page 17-26):**
 - New section on selecting projects without competition (e.g., public housing replacement projects in which the PHA has an ownership interest), after public notice through the 5-Year Plan.
- **Project or Proposal Selection (new section) (Section 17-II.D, page 17-29):**
 - Pre-selection inspection and written notice requirements. HAS policy: selection notices within 10 business days; for HAS-owned units, notice follows the board resolution and must be accepted in writing by the responsible official.
- **Housing Type (renumbered from 17-II.C) (Section 17-II.E, page 17-33):**
 - Updated limits on executing a HAP contract when construction/rehabilitation began before proposal submission or the AHAP.
- **Prohibition of Assistance for Certain Units (renumbered from 17-II.D) (Section 17-II.F, page 17-36):**
 - Ineligible unit list updated under 24 CFR 983.52.
- **Subsidy Layering Requirements (renumbered from 17-II.E) (Section 17-II.G, page 17-41):**
 - Updated citations (24 CFR 983.11, 983.153(b); FR Notice 3/13/23) and owner disclosure on form HUD-2880.
- **Site Selection Standards (renumbered from 17-II.G; former 17-II.H Environmental Review removed) (Section 17-II.H, page 17-44):**
 - Site and neighborhood standards restated under 24 CFR 983.55. HAS policy: sites generally limited to census tracts with poverty concentrations of 20 percent or less, with exceptions.
- **Housing Quality Standards (Section 17-III.B, page 17-47):**
 - Owner maintenance obligations added; new Housing Quality and Design Requirements subsection – HAS will identify special features case by case.
- **Inspecting Units (Section 17-III.D, page 17-49):**
 - Rewritten under 24 CFR 983.103. HAS policies: no assistance until units fully complies; no alternative inspections; HAP contract for existing housing executed within 45 calendar days of initial inspection; annual inspection of a random sample of at least 20 percent of units per building; interim inspection procedures.
- **Agreement to Enter into HAP Contract (AHAP) (Section 17-IV.B, page 17-53):**
 - “Agreement” renamed AHAP; updated content requirements (including broadband infrastructure). HAS policy: HAS will not waive use of an AHAP or execute one after construction begins.
- **Development Requirements (formerly Conduct of Development Work) (Section 17-IV.C, page 17-56):**
 - Retitled; Davis-Bacon labor standards for nine or more contract units expanded, including development within 18 months after HAP execution on existing units.
- **Completion of Work (formerly Completion of Housing) (Section 17-IV.D, page 17-58):**
 - Evidence-of-completion and acceptance requirements updated under 24 CFR 983.155-983.156, including independent entity review for PHA-owned units.
- **HAP Contract Requirements (Section 17-V.B, page 17-61):**
 - Adds effective date rules; extensions limited to 20 years each with total remaining term not to exceed 40 years.
- **Termination of the HAP Contract (new section) (Section 17-V.C, page 17-65):**
 - New section on termination by agreement, for insufficient funding, and for owner noncompliance, with housing quality enforcement for contracts executed or renewed June 6, 2024 or later. HAS policies: no HAP withholding on notice; abatement of only noncompliant units;

vouchers issued at least 30 days before termination with a 120-day term; public housing preference; up to two months of withheld/abated HAP used toward security deposits.

- **Amendments to the HAP Contract (renumbered from 17-V.C) (Section 17-V.D, page 17-75):**
 - Substitution and addition of contract units; HAS policy on when units will be added.
- **HAP Contract Year/Anniversary Dates; Owner Responsibilities; Additional HAP Requirements (renumbered) (Sections 17-V.E, 17-V.F and 17-V.G, page 17-75):**
 - Renumbered only.
- **Organization of the Waiting List (Section 17-VI.C, page 17-80):**
 - Project list updated: Sustainable Fellwood Phases 1 and 2 and Ashley Midtown Phase 1 removed from HAS-managed lists.
- **Owner-Maintained Waiting Lists (new section) (Section 17-VI.D, page 17-80):**
 - New section authorizing owner-maintained waiting lists at Sustainable Fellwood Phases 1 and 2 and Ashley Midtown Phase 1. HAS policies: owner waiting list policy must be approved by HAS; owners make preliminary eligibility determinations; HAS reviews owner lists annually.
- **Selection from the Waiting List (renumbered from 17-VI.D) (Section 17-VI.E, page 17-85):**
 - Renumbered only.
- **Offer of PBV Assistance or Owner's Rejection (renumbered from 17-VI.E) (Section 17-VI.F, page 17-86):**
 - Rewritten: effect of a family's refusal or an owner's rejection on waiting list position; briefing packet contents expanded; form HUD-52578-B Statement of Family Responsibility required; LEP paragraph removed.
- **Leasing of Contract Units (formerly 17-VI.F Owner Selection of Tenants) (Section 17-VI.G, page 17-89):**
 - Retitled; vacancy-filling rules for owner-maintained lists (owner notifies HAS within five business days; HAS eligibility determination within 30 calendar days).
- **Tenant Screening (Section 17-VI.G, page 17-91):**
 - VAWA protections (including human trafficking) apply to tenant screening; terminology updated.
- **Moves (Section 17-VII.C, page 17-96):**
 - Family right to move with tenant-based assistance after one year does not expire; HAS policy: written request processed within 10 business days; combined agency-wide list for PBV and RAD PBV families awaiting vouchers; VAWA emergency transfer provisions expanded.
- **Exceptions to the Occupancy Cap (Former Section 17-VII.D, page 17-100):**
 - Section deleted (content moved to 17-I.D).
- **Rent Limits (Section 17-VIII.B, page 17-101):**
 - Tax credit unit and exception payment standard language updated; SAFMR provisions rewritten (HAS will not apply SAFMRs to PBV).
- **Redetermination of Rent to Owner (Section 17-VIII.C, page 17-105):**
 - Adds automatic rent adjustments by Operating Cost Adjustment Factor (OCAF), allowed case by case; rent decrease rules updated.
- **Reasonable Rent (Section 17-VIII.C, page 17-108):**
 - Adds "rent floor" – HAS elects not to reduce rents below the initial rent to owner, except as required by 24 CFR 983.302(c)(2).
- **Effect of Other Subsidy and Rent Control (renumbered from 17-VIII.D) (Section 17-VIII.E, page 17-109):**
 - Renumbered only.

- **Vacancy Payments (Section 17-IX.B, page 17-111):**
 - Clarifies payment for the move-out month and vacancy payments of up to two full months following move-out, not exceeding the rent to owner less amounts received.
- **Project Record Retention (new section) (Section 17-IX.E, page 17-114):**
 - New section listing PBV project records to be kept for the HAP contract term plus three years.
- **PBV Development Information (Exhibit 17-1, page 17-115):**
 - Template expanded to include structure type, housing type and a utility responsibility table.

Chapter 18 – Project-Based Vouchers (PBV) Under the Rental Assistance Demonstration (RAD) Program

- **Overview and History of the RAD Program (Section 18-I.A, page 18-2):**
 - Adds RAD/Section 18 Blends: conversions after December 31, 2024 are placed under a single RAD PBV HAP contract governed by Notice PIH 2019-23, REV-4.
- **Applicable Regulations (Section 18-I.B, page 18-3):**
 - Adds provisions for legacy non-RAD PBV units and RAD/Section 18 blends under Notice PIH 2019-23, REV-4.
- **Relocation Requirements (Section 18-I.D, page 18-5):**
 - Removed provisions applying to projects that applied for conversion before November 10, 2016 (Notice PIH 2014-17).
- **PBV Project Selection – Overview; Ownership and Control (Sections 18-II.A and 18-II.B, page 18-8):**
 - References updated to Notice PIH 2019-23, REV-4 and RAD/Section 18 blends; outdated lead-in language removed.
- **PBV Percentage Limitation and Unit Cap (Section 18-II.E, page 18-13):**
 - Rewritten: RAD PBV units replacing former public housing are excluded from the program cap (20 percent plus 10 percent); no project cap applies to RAD PBV units, and units may not be “excepted” for a specified purpose.
- **Site Selection Standards (Section 18-II.F, page 18-14):**
 - Citation updated to 24 CFR 983.55 and REV-4.
- **Dwelling Units – Overview; Housing Quality Standards (Sections 18-III.A and 18-III.B, page 18-15):**
 - References updated to NSPIRE inspections and “housing quality standards”; statement that 24 CFR 5.703 does not apply removed; lead-based paint citation adds 40 CFR 745.227.
- **Inspecting Units (Section 18-III.D, page 18-16):**
 - Updated to 24 CFR 983.103: initial inspection options, periodic (formerly annual/biennial) inspections at least every 24 months, alternative inspection language, and new interim inspection timeframes (24 hours for life-threatening; 15 days for others); “Other Inspections” text removed.
- **HAP Contract Requirements (Section 18-IV.B, page 18-19):**
 - Adds renewal/rent redetermination after the 20-year initial term [Notice PIH 2025-03]; adds housing quality enforcement provisions for HAP contracts executed or renewed June 6, 2024 or later, with HAS policies matching Chapter 17 (tenant-caused deficiencies, abatement of noncompliant units only, vouchers with 120-day term, public housing preference, security deposit assistance from withheld/abated HAP).

- **HAP Contract Year and Anniversary Dates (Section 18-IV.D, page 18-27):**
 - Citation updated.
- **Prohibited Rescreening of Existing Tenants upon Conversion (Section 18-V.B, page 18-29):**
 - References updated to REV-4 and “legacy” non-RAD PBV units.
- **Organization of the Waiting List (Section 18-V.D, page 18-30):**
 - Removed requirement to assess changes in racial, ethnic or disability-related tenant composition.
- **Selection from the Waiting List (Section 18-V.E, page 18-31):**
 - Citations updated; accessible-unit selection language restated.
- **Offer of PBV Assistance (Section 18-V.F, page 18-32):**
 - Rewritten to match Chapter 17: effect of family refusal/owner rejection on waiting list position; expanded briefing packet; form HUD-52578-B required; effective communication requirements; LEP paragraph and “Disapproval by Landlord” text removed.
- **Leasing of Contract Units (formerly Owner Selection of Tenants) (Section 18-V.G, page 18-35):**
 - Retitled; owner must give HAS a copy of rejection notices; vacancy notice by email within five business days; HAS refers eligible families within 30 calendar days (previously 10 business days); unit may not be offered until HAS confirms eligibility.
- **Tenant Screening (Section 18-V.H, page 18-36):**
 - VAWA protections (including human trafficking) apply to tenant screening.
- **Lease (Section 18-VI.B, page 18-37):**
 - Adds lease requirements under Notice PIH 2025-03 (zero-HAP provisions, plain language, no new security deposit or pet prohibition for in-place residents); form HUD-52530-C tenancy addendum; continuation of HAP rewritten for pre-conversion residents and new admissions (alternate rent/Zero HAP Rent Cap) – HAS will not request waivers to apply pre-conversion alternatives to new admissions; security deposit may be collected where none was previously provided.
- **Public Housing FSS and ROSS Participants (Section 18-VI.C, page 18-44):**
 - Updated for REV-4: FSS participation continues for the grant’s period of performance; ROSS-SC grant renewal eligibility after conversion; legacy non-RAD PBV units covered.
- **Moves (Section 18-VI.E, page 18-45):**
 - Wrong-sized/accessible unit rules updated (offer within 60 days; removal of unit from HAP contract; 90-day limit); right to move does not expire; new Choice Mobility subsection – HAS will inform families of choice mobility rights at lease signing and annual recertification; VAWA emergency transfer provisions expanded.
- **Earned Income Disallowance (Former Section 18-VI.G, page 18-51):**
 - Section deleted (EID eliminated); following sections renumbered 18-VI.G (Residents’ Procedural Rights) and 18-VI.H (Informal Reviews and Hearings).
- **Initial Contract Rents (Section 18-VII.A, page 18-53):**
 - Adds blended rent schedule for RAD/Section 18 Blends.
- **Adjusting Contract Rents (Section 18-VII.B, page 18-54):**
 - Rewritten: annual OCAF adjustments applied to contract rent less debt service; HUD approval not required; missed prior-year OCAFs applied retroactively. HAS policy: owner submits OCAF worksheet (form HUD-9624) 60-120 days before the HAP anniversary; independent entity validates.

- **Utility Allowances (Section 18-VII.C, page 18-56):**
 - PHA administering the contract must maintain the utility allowance schedule; site-specific utility allowance option described; HAS will continue to use the HCV utility allowance schedule.
- **Reasonable Rent (Section 18-VII.D, page 18-57):**
 - Reasonable rent must be based on the unit's condition at the time of determination; requirement to send PHA-owned determinations to the HUD field office removed.
- **Vacancy Payments (Section 18-VIII.B, page 18-58):**
 - Clarifies move-out month payment and vacancy payments up to two full months; HAS will decide case by case whether to provide vacancy payments, as stated in the HAP contract.
- **Phase-In of Tenant Rent Increases (Section 18-VIII.D, page 18-61):**
 - EID-related sentence removed; phase-in applies to legacy non-RAD PBV units in the covered project.
- **PBV Development Information (Exhibit 18-1, page 18-63):**
 - Template fields removed (applicable RAD notice, HOTMA requirements, excepted units, subsidy standards).

Chapter 19 – Special Purpose Vouchers (New Chapter)

- **Introduction (page):**
 - New chapter establishing HUD requirements and HAS policies for administering special purpose vouchers. HAS identifies three programs: Family Unification Program (FUP), Foster Youth to Independence (FYI), and Veterans Affairs Supportive Housing (VASH).
- **Part I- Family Unification Program (FUP) (Section 19-I.A through 19-I.K, pages):**
 - Establishes eligibility, referral procedures, partnership responsibilities, waiting list selection, voucher issuance, leasing, termination, portability, and project-based requirements for families involved with the child welfare system and eligible foster youth.
 - HAS policies include a 120-day initial voucher term, one automatic 90-day extension upon timely request, housing search assistance, and coordination with partnering agencies. Addresses time limits for FUP youth and continued assistance for eligible families.
- **Part II- Foster Youth to Independence (FYI) (Section 19-II.A through 19-II.K, pages)**
 - New provisions establishing and referral requirements for youth transitioning from foster care who are homeless or at risk of homelessness. Includes coordination with child welfare agencies, supportive services, waiting list procedures, voucher issuance, maximum assistance periods, termination, and portability.
 - HAS policies provide a 120-day initial voucher term, one automatic 90-day extension upon timely request, and additional extension when applicable. HAS will administer FYI vouchers as tenant-based assistance and will not project-base FYI vouchers.
- **Part III- Veterans Affairs Supportive Housing (VASH) (Section 19.III beginning page)**
 - New chapter establishing HUD requirements and HAS policies for administering special purpose vouchers. HAS identifies three programs: Family Unification Program (FUP), Foster Youth to Independence (FYI), and Veterans Affairs Supportive Housing (VASH).

Overall Impact: Chapter 19 consolidates special purpose voucher requirements into a dedicated chapter, clarifies HAS responsibilities and partnership procedures, and establishes consistent administration of FUP, FYI, and VASH assistance in accordance with applicable HUD requirements.