

Administrative Plan - Summary of Changes in the Current Revision/s

Below is a high-level summary of the changes contained in the August 2024 and February 2025 revision, organized by chapter.

Introduction

- Added explanation of HOTMA changes throughout the policy document, including changes for Sections 102 and 104 and the HOTMA Voucher Final Rule.
- Added explanation of the use of HQS and NSPIRE in the policy document.

Chapter 1

- Added information on the HOTMA Voucher Final Rule to the Overview and History of the Program.
- Updated terminology from NSPIRE to “minimum quality standards” per the HOTMA Voucher Final Rule.
- Added policies on increases and decreases in the payment standard to the list of required plan contents

Chapter 2

- Added additional examples to the list of reasonable accommodation types.

Chapter 3

- Called out and added policies that will be effective prior to the PHA’s HOTMA 102/104 compliance date.
- Called out and added policies for HOTMA 102/104 that will become effective upon the PHA’s compliance date.
- Clarified policy language on live-in aides to better align with fair housing best practices.
- Added families eligible for VASH to the list of eligible applicant families.
- Clarified language regarding the EIV Income Report.
- Incorporated the definitions of family, foster adult, and foster child to be effective prior to the PHA’s general HOTMA 102/104 compliance date as required by Notice PIH 2024-38.

Chapter 4

- This chapter contains only minor corrections and clarifications.
- Insert the amount of time the PHA considers reasonable for a family to retain its place on the waiting list pending disclosure and documentation of social security numbers.

Chapter 5

- Clarified fair housing and NSPIRE-related language throughout the chapter to bring the content current with the HOTMA Final Rule.

Chapter 6

- Split Chapter 6 into two chapters: 6.A and 6.B.
- Chapter 6.A. contains no redlines. Review and edit this chapter as needed to reflect your current PHA policy.
- Chapter 6.B represents the policies the PHA will use upon the HOTMA 102/104 compliance date and contains changes made to the previously released version of Chapter 6. This includes:
 - Clarifications and corrections regarding student financial assistance requirements under HOTMA.
 - Clarifications regarding the treatment of alimony and child support.
 - Clarifications regarding amounts adjusted annually under inflation under HOTMA.
 - Updates to the list of federally mandated income exclusions.
 - Clarifications regarding necessary and non-necessary personal property.
 - Clarifications regarding health and medical care expenses.
 - Required changes for the HOTMA Voucher Final Rule, including changes regarding increases and decreases in payment standards. Policies effective prior to and upon specific effective dates are explicitly called out.
 - Additions to the section on applying utility allowances regarding flat fees and PBV developments.
- Chapter 6.B represents the policies the PHA will use upon the HOTMA 102/104 compliance date. Only minor corrections and clarifications have been made to this chapter.

Chapter 7

- Split Chapter 7 into two chapters: 7.A and 7.B.
- Chapter 7.A. contains no redlines. Review and edit this chapter as needed to reflect your current PHA policy.
- Chapter 7.B represents the policies the PHA will use upon the HOTMA 102/104 compliance date and contains changes made to the previously released version of Chapter 7. This includes:
 - Changes regarding the use of consent forms, specifically as related to HUD-9886-A.
 - Clarifications regarding amounts adjusted annually under inflation under HOTMA.
 - Policy revisions for streamlined income determinations from fixed sources of income.
 - Certain updates for Notice PIH 2023-27 regarding verification requirements, use of EIV + self-certification, verification of net family assets, and treatment of zero-income families.
 - Under the heading “Upfront Income Verification Using Non-HUD Systems,” insert any additional UIV sources used by the PHA.
- Chapter 7.B represents the policies the PHA will use upon the HOTMA 102/104 compliance date. This chapter contains no changes since the last revision.

Chapter 8

- Split Chapter 8 into two chapters: 8.A and 8.B.
- Chapter 8.A represents the policies the PHA will use prior to the NSPIRE compliance date while still operating under HQS and contains only those changes prior to 2023 that fall outside the scope of NSPIRE. This includes:
 - An explainer regarding the use of HQS until such time as NSPIRE becomes effective.
 - Additions regarding NSPIRE requirements that are applicable to HQS prior to transitioning to NSPIRE.
 - Various revisions for the HOTMA Voucher Final Rule. Policies effective prior to and upon specific effective dates are explicitly called out.
- Chapter 8.B represents the policies the PHA will use upon the NSPIRE compliance date and contains changes made to the previously released version of Chapter 8. This includes:
 - Updates for Notice PIH 2024-26.
 - An explainer on the continued use of the term housing quality standards.
 - Various revisions for the HOTMA Voucher Final Rule. Policies effective prior to and upon specific effective dates are explicitly called out.

Chapter 9

- Revisions to revert back to using the term housing quality standards as per the HOTMA Voucher Final Rule.
- Clarification regarding permitting the family to submit more than one request for tenancy approval at a time.
- Clarification regarding PHA-owned units.
- Clarifications regarding HAP contract execution.

Chapter 10

- Added section on family moves due to unit deficiencies per the HOTMA Voucher Final Rule.
- Clarified policy regarding voucher issuance and term of the voucher.

Chapter 11

- Split Chapter 11 into two chapters: 11.A and 11.B.
- Chapter 11.A. contains no redlines. Review and edit this chapter as needed to reflect your current PHA policy.
- Chapter 11.B represents the policies the PHA will use upon the HOTMA 102/104 compliance date and contains changes made to the previously released version of Chapter 11. This includes:
 - Minor clarifications regarding calculating annual income at reexamination.
 - Required revisions for the HOTMA Voucher Final Rule, including revisions regarding changes in family unit size. Policies effective prior to and upon specific effective dates are explicitly called out.

- Chapter 11.A. contains only one minor chapter number correction.

Chapter 12

- Added a callout to state that the section on failure to provide consent is effective upon the PHA's HOTMA 102/104 compliance date.
- Added a section on the asset limitation with a callout effective upon the PHA's HOTMA 102/104 compliance date.
- Clarification regarding insufficient funding.
- Reverted references to housing quality standards.
- Moved the callout to state that a newly added policy on failure to provide consent, rather than the section, is effective upon the PHA's HOTMA 102/104 compliance date.
- Added cross reference to Chapter 16 under policy regarding consideration of circumstances.

Chapter 13

- Clarifications to bring content in line with the HCV Landlord Strategies Guidebook.
- Reverted references to housing quality standards.

Chapter 14

- Reverted references to housing quality standards.
- Added a callout to state that the section on de minimis errors is effective upon the PHA's HOTMA 102/104 compliance date.
- Revised amount of federal awards required to have an independent audit.
- Revised section on De Minimis Errors to be effective prior to the PHA's general HOTMA 102/104 compliance date as required by Notice PIH 2024-38.

Chapter 15

- Changes for the HOTMA Voucher Final Rule regarding manufactured home space rentals, eligible housing expenses, distribution of HAP, and single HAP to family.
- Reverted references to housing quality standards.
- Minor clarifications regarding homeownership counseling and homeownership assistance payments

Chapter 16

- Required revisions for the HOTMA Voucher Final Rule, including extensive revisions concerning payment standards and the use of SAFMRs.
- Reverted references to housing quality standards.
- Clarified language regarding informal hearings.
- Added section on Criminal Prosecution for Program Fraud/Abuse to better align with HUD protocols.
- Revised section on General Repayment Agreement Guidelines for Families to better align with HUD protocols.

Chapter 17

- This chapter has undergone an extensive rewrite for the HOTMA Voucher Final Rule. As such, it contains no redlines and should be completely replaced.
- Section 17-I.C.: Under the heading “Increased Cap,” review the policy options in the Instruction Guide and select language from one or more of the options, inserting additional information where indicated.
- Section 17-I.D.: Under the heading “Exceptions to the Project Cap,” review the policy options in the Instruction Guide and select language from one or more of the options, inserting additional information where indicated.
- Section 17-I.E.: Under the heading “Units Not Subject to the PBV Program Cap or Project Cap,” insert the names of projects where units are not subject to the program cap or project cap because they were previously subject to federal rent restrictions or received another type of long-term housing subsidy.
- Section 17-I.F.: Under the heading “PHA-Owned Units,” insert the name of the independent entity the PHA will use to review proposals for PHA-owned housing.
- Section 17-VI.C.: Under “Organization of the Waiting List,” insert the list of projects/buildings receiving PBV assistance for which separate waiting lists are maintained.
- Section 17-VI.C.: Under “PHA Waiting List Preferences” see the Instruction Guide and insert information on applicable preferences.
- Section 17-VI.D.: Under “Owner-Maintained Waiting Lists” insert the list of projects for which owners maintain waiting lists.

Chapter 18

RESERVED

Chapter 19

- Multiple clarifications to the section on FUP vouchers.
- Extensive changes to the VASH section to account for the requirements set forth in the Federal Register on August 13, 2024.
- Extensive changes to the Mainstream section to account for the requirements set forth in Notice PIH 2024-30.
- Introduction: List the special purpose vouchers the PHA administers.
- Section 19-I.B.: If administering FUP vouchers, insert the names of the partnering organizations.
- Section 19-I.E.: If administering FUP vouchers, under the heading “Statutory Exceptions,” insert the definition of incapacitated person under state and local law.
- Section 19-II.B.: If administering the FYI program, under the heading, “Public Child Welfare Agency (PCWA),” insert the name of the PCWA.

- Section 19-II.B.: If administering the FYI program, under the heading “Continuum of Care (CoC) and Other Partners,” insert the names of any other partners designated in the partnership agreement.
- Section 19-II.H.: If administering the FYI program, under the heading, “Statutory Exceptions,” insert the definition of incapacitated person under state and local law.
- Section 19-IV.C.: If administering Mainstream vouchers, insert the names of the partnering groups.
- Section 19-IV.D.: If administering Mainstream vouchers, under the heading “Admission Preferences,” insert the PHA’s preference for targeted groups.
- Section 19-VI.B.: If administering the Stability Voucher program, insert the names of the partnering organizations.

Glossary

- Called out various definitions for HOTMA. Definitions effective prior to and upon specific effective dates are explicitly called out.
- Reverted references to housing quality standards.
- Removed references to various definitions related to HOTMA 102/104 becoming to be effective upon the compliance date as required by Notice PIH 2024-38.

Appendix

- Added a new appendix per recent HUD guidance to explicitly call out HOTMA 102/104 policies that are on hold until implementation.
- Revised appendix to explicitly call out HOTMA 102/104 policies that are on hold until implementation versus policies that are applicable no later than July 1, 2024, per Notice PIH 2024-38.