

Overview of Changes in the 2/2025 Revision - Below is a high-level summary of the changes contained in the February 2025 revision, organized by chapter.

Chapter 3

- 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 5

- This chapter contains only one citation correction.

Chapter 6

- Chapter 6.A. incorporates HOTMA 102/104 changes required to be implemented by July 1, 2025, per Notice PIH 2024-38. This includes changes regarding:
 - Minors
 - Full-time students and student financial assistance
 - Earned income
 - Business income
 - Periodic payments
 - Nonrecurring income
 - State payments to allow individuals with disabilities to live at home
 - Civil rights settlements
 - Federally mandated and other income exclusions
 - Lump-sum additions to net family assets
 - ABLE accounts
 - Trusts
 - Health and medical care expenses
- 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

- Chapter 7.A. incorporates HOTMA 102/104 changes required to be implemented by July 1, 2025, per Notice PIH 2024-38. This includes changes regarding:
 - Student financial assistance
 - The health and medical care expense deduction
- 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 9

- This chapter contains only a minor citation update.

Chapter 11

- Chapter 11.A. contains only one minor chapter number correction.
- Chapter 11.B represents the policies the PHA will use upon the HOTMA 102/104 compliance date. It likewise contains only one minor chapter number correction.

Chapter 12

- 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 14

- 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

- Clarified language regarding homeownership assistance expenses.

Chapter 16

- 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 18

- Multiple sections of this chapter have been revised to align with Notice PIH 2025-03, RAD Supplemental.

Glossary

- 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

- 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.

Overview of Changes in the 8/2024 Revision - Below is a high-level summary of the changes contained in the August 2024 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.

Chapter 4

- This chapter contains only minor corrections and clarifications.

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 red lines. 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 7

- Split Chapter 7 into two chapters: 7.A and 7.B.

- Chapter 7.A. contains no red lines. 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.

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 red lines. 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 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*.

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.

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*.

Chapter 17

- This chapter has undergone an extensive rewrite for the HOTMA Voucher Final Rule. As such, it contains no red lines and should be completely replaced.

Chapter 18

- Reverted references to *housing quality standards*.
- Citation updates for Notice PIH 2019-23, REV-4, as amended by RAD Supplemental Notice 4B.
- Multiple revisions for the HOTMA Voucher Final Rule throughout the chapter. Policies effective prior to and upon specific effective dates are explicitly called out.

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.

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*.

Appendix

- Added a new appendix per recent HUD guidance to explicitly call out HOTMA 102/104 policies that are on hold until implementation.

Overview of Changes in the 9/2023 Revision Below is a high-level summary of the changes contained in the September 2023 revision, organized by chapter.

Chapter 1

- Added information on the Housing Opportunity through Modernization Act (HOTMA) to the Overview and History of the Program section.
- Revised the section on Contents of the Plan to include information on project-based vouchers and policies governing special housing types.

Chapter 2

- Expanded the existing policies on discrimination complaints with a new section on Discrimination Complaints., which includes guidance from Notice FHEO 2023-01.

Chapter 3

- Revised various areas of the chapter to account for HOTMA changes, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic. This includes a new section on Restriction on Assistance Based on Assets.
- Included the term *human trafficking* with Violence Against Women Act (VAWA) language, in addition to other VAWA clarifications to better align with current guidelines such as the implementation Guidance for VAWA 2022 published in the *Federal Register* on January 4, 2023.
- Clarified language on disparate impact and discriminatory effects per the final rule dated March 31, 2023.

Chapter 4

- Included the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.

Chapter 5

- Included the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.

Chapter 6

- This chapter was completely rewritten from the ground up to account for HOTMA changes, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic.
- Also included are changes regarding exceptions to utility allowances as a reasonable accommodation.

Chapter 7

- As with Chapter 6, the bulk of this chapter had to undergo a complete rewrite for HOTMA. Many of the changes were required due to updates in verification requirements outlined in Notice PIH 2023-27.

Chapter 8

- This chapter only contains a minor policy adjustment to the Inspection Results section to disallow self-certification of repairs.

Chapter 9

- Included the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.

Chapter 10

- Included the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.

Chapter 11

- As with Chapters 6 and 7, the bulk of this chapter had to undergo a complete rewrite to account for HOTMA, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic.

Chapter 12

- Revised the policy that the PHA will terminate assistance if the family has been evicted from federally assisted housing in the last five years to reduce the number of years to three.
- Included the term *human trafficking* with Violence Against Women Act (VAWA) language, in addition to other VAWA clarifications to better align with current guidelines such as the implementation Guidance for VAWA 2022 published in the *Federal Register* on January 4, 2023.

Chapter 13

- Revised policy in HAP Contract Term and Terminations section for clarification.
- Included the term *human trafficking* with Violence Against Women Act (VAWA) language, in addition to other minor VAWA clarifications to better align with current guidelines such as the implementation Guidance for VAWA 2022 published in the *Federal Register* on January 4, 2023.

Chapter 14

- Added a new subsection and accompanying policy on De Minimis Errors, plus a minor clarification to account for HOTMA changes, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic.

Chapter 15

- Reworked Chapter 15 to include the policies by default rather than directing to the guide. Policies are now included where relevant in the event that the PHA grants use of a special housing type as needed as a reasonable accommodation.

Chapter 16

- Included the term *human trafficking* with Violence Against Women Act (VAWA) language, in addition to other VAWA clarifications to better align with current guidelines such as the implementation Guidance for VAWA 2022 published in the *Federal Register* on January 4, 2023.
- Included changes regarding exceptions to utility allowances as a reasonable accommodation.
- Modified the policy on evidence for the informal hearing to eliminate the charge of copying documents related to the hearing.
- Added a record retention policy that the PHA will keep for at least three years records of all complaints, investigations, notices, and corrective actions related to fair housing violations.

Chapter 17

- Made minor updates to account for the *Federal Register* notice issued March 3, 2023, on subsidy layering requirements.
- Added a minor clarification on asset limitation requirements to the section on Eligibility for PBV Assistance to account for HOTMA changes.
- Included the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.

Chapter 18

- Added information and clarification to the Applicable Regulations, PBV Percentage Limitation and Unit Cap, Inspecting Units, and Continuation of Housing Assistance Payments sections to account for the most recent Rental Assistance Demonstration (RAD) notice, PIH 2023-19.
- Added a minor clarification on asset limitation requirements to the section on Eligibility for PBV Assistance to account for HOTMA changes.
- Included the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.

Chapter 19

- Added a new Part VI on Stability Vouchers.

- Revised Part II on the Foster Youth to Independence (FYI) Initiative to account for guidance set forth in Notice PIH 2023-04.
- Included the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.

Glossary

- Updated acronyms and definitions for all cumulative changes specified above.

Overview of Changes in the 3/2023 Revision - Below is a high-level summary of the changes contained in the September 2023 revision, organized by chapter.

Chapter 1

- Revised the list of owner responsibilities to account for NSPIRE.

Chapter 3

- Updated cross-references to correspond with updates in Chapter 8.

Chapter 5

- Revised family obligations to account for NSPIRE.

Chapter 8

- This chapter contains extensive rewrites to update for NSPIRE requirements.

Chapter 9

- Additions and updates to citations for NSPIRE.

Chapter 10

- Removed references to Housing Quality Standards.
- Removed duplicative/conflicting policy information regarding voucher extensions and expiration.
- Clarified policy regarding sending documentation to the receiving PHA.

Chapter 11

- Removed references to HQS and updated for NSPIRE.
- Updated policy language to mirror language elsewhere in the admin plan.

Chapter 12

- Updated Exhibit 12-1, Statement of Family Obligations, with NSPIRE language.

Chapter 13

- Removed references to HQS and updated for NSPIRE.

Chapter 14

- Removed references to HQS and updated for NSPIRE.

Chapter 15

- Multiple updates to account for NSPIRE's effect on various special housing types.

Chapter 16

- Removed references to HQS and updated for NSPIRE.

Chapter 17

- Multiple updates throughout to account for NSPIRE's effect on PBV program requirements.

Chapter 18

- Removed references to HQS and updated for NSPIRE.

Chapter 19

- Removed references to HQS and updated for NSPIRE.

Glossary

- Revised various definitions for HOTMA.
- Removed references to HQS and updated for NSPIRE.