

## Housing Authority of the City of Asheville

Summary of Administrative Plan Changes				
Page	Chapter	Policy Title	HACA Old Policy	Summary of Changes
				<b>Verify where HOTMA 2024 Final Rule changes apply</b>
	<b>Title Page</b>		No Changes	
TOC-1	TOC	Administrative Plan – Table of Contents		<ul style="list-style-type: none"> <li>- Added HACA 2024 Admin Plan to each footer page</li> <li>- Renumbered and adjusted headings</li> </ul>
				Documents/locations updated
	<b>1</b>	<b>Overview of Program and Plan</b>		
1-2		Organization and Structure of the PHA		<ul style="list-style-type: none"> <li>- Inserted “HACA” “Asheville Housing Authority” name and the jurisdictions covered by HACA.</li> <li>- Added HACA name to Mission Statement</li> </ul>
1-3	I-I.D	PHA’s Program		<ul style="list-style-type: none"> <li>- Added all programs HACA’s administrative plan is applicable to: HCV, RAD, PBV, MTW.</li> <li>- Revised providing excellent service to the HACA residents</li> </ul>
1-6	I-II.A	Overview and History		<ul style="list-style-type: none"> <li>- Highlight paragraph defining HOTMA and its impact on the public housing and Section 8 programs and the implementation of HOTMA’s Final Rule.</li> </ul>
1-7		HCV Partnerships		<ul style="list-style-type: none"> <li>- Updated/added acronym ACC and a Housing Assistance Payment (HAP) under contractual partnerships.</li> </ul>
1-8		HCV Relationship Chart		<ul style="list-style-type: none"> <li>- Edited HCV Relationship Diagram deleting term Housing Assistance Payments.</li> </ul>
1-10				<ul style="list-style-type: none"> <li>- Added acronym HAP deleting Housing Assistance Payments related to terms an owner must comply with.</li> </ul>
1-14				<ul style="list-style-type: none"> <li>- Minor adjustment to last two bullets regarding governing policies lengthening them into three bullets.</li> </ul>

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	<b>2</b>	<b>Fair Housing and Equal Opportunity</b>		
2-3			-No state or local nondiscrimination laws or ordinances apply	- In addition to legal sources listed, state anti-discrimination laws applying to HACA were added: State Fair Housing Act NCGS Ch. 41A and NCGS 42-40.
2-4			-PHA policy did not identify any additional protected classes.	- Revised HACA policy with addition of protected classes against discrimination.
2-5				- Deleted term Housing Assistance Payments
2-16				- Under Oral Interpretation added the sentence stating alternative methods including computer aided applications such as Google Translate will be used to provide translation.
	<b>3</b>	<b>Eligibility</b>		
3-7	3-I.J		- Guest stay in unit no longer that 30 consecutive days or 90 cumulative days total during 12-month period.	- HACA policy highlighted. Revised guest stay, to no longer that 10 consecutive days or 30 cumulative days total during 12-month period.
3-8	3-I.K			- Expanded the HACA policy to include appropriated definition of a foster child.
3-12			Page 3-11	- Page renumbered to 3-12 due to revisions and additions. - No changes. Highlighted area under Using Income Limits for Eligibility 3-II.A.
3-16 3-17			Page 3-15	- Page renumbered 3-16 through 3-17 - No change. Highlighted area under 3-II.D Family Consent to Release of Information along with the HACA Policy.
3-26				- Page renumbered 3-26 - No changes but highlighted last two bullets under 3-II.B Mandatory Denial of Assistance.
3-27				- No changes. Highlighted title heading of 3-III.C
3-28				- Page renumbered due to revisions and additions. - Under 3-III.D Criminal Activity revised criminal activity by any household member that can result in denial of assistance to the family.

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				- Deleted line defining immediate vicinity.
3-32	3-III.E	Screening for Suitability as a Tenant	-PHA will not provide any additional information to the owner.	- Addition to HACA Policy stating that information regarding a household member's compliance with lease, housekeeping inspections, timely rent payment, and other violations of lease in the HCV program can be provided to landlords upon request. - HACA staff may provide tenancy history of a tenant who resides in a unit owned by HACA or its affiliates upon owner's request.
3-36	3-III.G			- Second HACA Policy highlighted only.
3-37	3-III.H			- Added/highlighted word Human trafficking to title heading. - Highlighted only first bullet of 2022 Violence Against Women Acts (VAWA) changes. - Various 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.
	<b>4</b>	<b>Applications, Waiting List, and Tenant Selection</b>		
4-3 4-4	4-I.B		Did not include a pre-application process. Included process using manual application process.	- HACA Policy revised with various additions explaining in detail the pre-, one-step, and second step allocation process. - Addition of 3% rate to ensure needs of the applicants' households are appropriately matched. - Deletion of initial PHA requirements. - Introduction stating the updated application process to be completed on-line through electronic means. (Paper applications will no longer be accepted).
4-7				- Altered page format - Reworked HACA Policy to include the ability of the applicant to apply for one or both HCV or PBV waiting Lists. Lists will still not be merged.
4-8 4-9				- Page re-formatted - Added The Urban News as a media outlet. - Grammatical errors

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4-10				- No changes. Just highlighted areas
4-16	4-III.C			- Page renumbered due to addition of targeted funding types on 4-13, the first come first serve policy, special housing needs. - Minor word corrections
4-17				- Deleted line that current residents can request tenant mobility voucher if seeking to move. - Expanded Voluntary transfer section to include Family Self Sufficiency (FSS) - Added Note section regarding absence of HUD-VASH vouchers which are issued based on referrals from Charles George VA Medical Center. Also, there is not a waiting list for Emergency Housing Vouchers maintained.
4-18			Chapter ends on page 4-18	- Revised HACA Policy under Order of Selection based on a first-come, first-served basis and date PHA receives application.
4-20	4-III.E			- Pages renumbered - Amount of time reasonable for PHA to allow family to retain its place on waiting list is 60 days pending disclosure and documentation of social security numbers. - Added sentence offering other means of communication to ensure opportunities to respond.
	<b>5</b>	<b>Briefings and Voucher Issuance</b>		- Minor formatting changes
5-9 to 5-13				- Sections under Family Obligation pages reordered. No changes to that section were made.
5-13 to 5-14	5-II.B			- Added section and sub-sections on HACA PBV unit on adjusted subsidy standards regarding wait times of unit size.
5-17	5-II.E			- No changes. 60-day voucher term highlighted.
5-18				- Added to HACA Policy that PHA will not approve extensions beyond 120 days.
	<b>6</b>	<b>Income and Subsidy Determinations</b>		- Page numbers are not consistent

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6-1	Introduction HACA Policy (MTW)			<ul style="list-style-type: none"> <li>- HACA Policy (MTW) added.</li> <li>- HACA approved to implement stepped rent policy model (MTW Activity 2022-1) for certain eligible families. See Exhibit 6-0.</li> </ul>
6-9	6-I.D	Earned Income		<ul style="list-style-type: none"> <li>- Under military pay added titles: Types of earned Income Not Counted in Annual Income and Temporary, Nonrecurring or Sporadic Income [24 CFR 5.609 (c)(9)]</li> </ul>
			Entire chapter redone.	<ul style="list-style-type: none"> <li>- Chapter 6 accounts for HOTMA changes not to be implemented before 10/1/2024.</li> <li>- Includes exceptions to utility allowances as reasonable accommodation.</li> </ul>
6-32	6-II.B	Assets Disposed of for Less Than Fair Market		<ul style="list-style-type: none"> <li>- Under Minimum Threshold policy expanded to include expiration of disposed assets after two-year period with exceptions depending on recertification. Along with Assets placed by family in nonrevocable trusts.</li> <li>- Page renumbered</li> </ul>
6-60	Part IV 6-IV.A	Overview of Rent and Subsidy Calculations	\$0	<ul style="list-style-type: none"> <li>- Minimum Rent for this locality is \$50</li> </ul>
6-62	6-IV.B	Financial Hardship Affecting Minimum Rent	\$0	<ul style="list-style-type: none"> <li>- Changed minimum rent \$50. Added line that rules do not apply to families on the stepped rent. See Stepped Rent Hardship Policy in Exhibit 6-0.</li> </ul>
6-70				<ul style="list-style-type: none"> <li>- Added Exhibit 6-0: MTW Demonstration – Stepped Rent</li> </ul>
	<b>7</b>	<b>Verification</b>		
7-11	7-I.E			<ul style="list-style-type: none"> <li>- Minor format adjustment</li> </ul>
7-12				<ul style="list-style-type: none"> <li>- Highlighted first line of HACA Policy: Exception when to use EIV Income Report – when Safe Harbor verification is used.</li> </ul>
7-13		EIV Identity Verification Report		<ul style="list-style-type: none"> <li>- Highlighted Notice PIH 2023-27: issued originally 9/29/23 updated 2/2/24 on verification hierarchy for PHAs and third-party verifications.</li> </ul>
7-14	7-I.E	Upfront Income Verification Non-HUD Systems		<ul style="list-style-type: none"> <li>- Staff stated it is main format in verifying resident income.</li> </ul>

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7-17	7-I.G		PHA will attempt to send written verification when other methods are unavailable. PHA may choose oral third-party on case-by-case in lieu of.	- HACA Policy revised to state HACA will not use/require written third-party verification based on MTW waiver.
7-17	7-I.H		PHA could accept self-certification from family if written third-party forms not returned in 10 business days. Oral verification should be documented.	- HACA Policy revised to state HACA will not use/require written third-party verification based on MTW waiver.
7-18			PHA will pay service charge if family unable to obtain original documentation.	- HACA Policy revised to state HACA will not use/require written third-party verification based on MTW waiver. - Included that If family cannot provide original documents, self-certification acceptable as only means.
7-19 7-20	7-I.I			- Included in addition that Families with net assets totaling \$50,000 or less, the PHA will accept self-certification from family. Family 18 and older sign declaration. If over \$50,000 PHA will use third-party documentation for assets for intake whenever a family member is added and then every year.
7-21	(Blank)		Part II: Verifying Family Information	- Pages renumbered from this point due to HACA Policy additions.
7-31	7-II.H		Pg. 7-30 Preferences offered to family that has been terminated from HCV due to insufficient funding. Preference also offered for victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking per 4-III.C. and 16-IX.D.	- Added reference to see Chapter 4-III.C Selection Method regarding preferences. - Renumbered
7-32	7-III.A	<b>Earned Income</b>		- Under Tips highlighted UIV verification sources - Under Wages revised to state wages and other tips provided by family must be the originals from two most current, consecutive pay stubs.
7-33	7-III.B			- Highlighted first two paragraphs after HACA Policy.
7-43	(Blank)		Part IV: 7-IV.A	
7-46	7-IV.C			- Renumbered

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				- Highlighted paragraph regarding compliance with Health Insurance Portability and Accountability Act (HIPAA)
	8	<b>National Standards for the Physical Inspection of Real Estate and Rent Reasonableness Determinations</b>		This changes over to NSPIRE inspection standards. HQS no longer compliant with HUD. NMA will issue policies once HUD issues more specific guidance. This chapter contains minor policy adjustments and mainly focuses on Inspection results regarding self-certification of repairs.
8-5 8-6				- Added to this HACA Policy adopting specific requirements that elaborate on HUD standards pertaining to repairs within local housing codes: Walls, Windows, Doors, Floors, Sinks, Toilets, Security (bars, security screens)
8-13 8-14	8-II.A	<b>Inspection of PHA-Owned Units</b>		- Included HACA Policy (MTW) Asheville Housing approved for waiver of third-party inspection requirements. - Asheville Housing may use its own trained employees in the HCV Program to perform regular and interim NSPIRE Inspections of PBV units that Asheville Housing owns and manages. - Specific quality control measures apply: provision should not alter NSPIRE inspection requirements as defined by HUD. Inspectors report to Internal Audit Specialist and no longer under direction of property management. - Added table defining standard minimum number of quality control inspections to be completed along with rates performed. - Families may request in writing an interim inspection. - HUD may request third-party services to determine if PHA owned units pass NSPIRE.
8-15	8	<b>Inspection Costs Remote Video Inspections(RVIs)</b>	PHA will not charge fee for failed inspections. PHA will not utilize RVIs.	- The PHA will charge \$100 for each failed reinspection. - RVI can be utilized as technology permits.
8-22	8-III.A			- HACA Policy (MTW) added Asheville Housing use of its own trained employees in HCV Program to perform rent reasonableness for PBV units it owns using

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				AffordableHousing.com or similar independent third-party online sites.
	<b>9</b>	<b>General Leasing Policies</b>		Inclusion of term human trafficking with Violence Against Women Act (VAWA) language to better align with current guidelines.
<b>9-14</b>	<b>9-I.H</b>	<b>Changes in Lease or Rent</b>	Allotted specific time frame for rent increase requests by owner.	<ul style="list-style-type: none"> <li>- Owner can submit request for rent increase in writing 60 days prior to annual recertification/lease renewal. PHA will determine if request is reasonable. Increase will take effect on recertification date.</li> <li>- PBV units will be implemented on anniversary of HAP Contract.</li> </ul>
	<b>10</b>	<b>Moving with Continued Assistance and Portability</b>		<ul style="list-style-type: none"> <li>- Zero HAP guidance</li> <li>- Inclusion of term human trafficking with Violence Against Women Act (VAWA) language to better align with current guidelines.</li> </ul>
	<b>11</b>	<b>Reexaminations</b>		Utilize polices from Administrative Plan dated 7/1/2023 until HOTMA chapter is implemented.
<b>11-1 11-2</b>	<b>11-I.A</b>	<b>Overview</b>		<ul style="list-style-type: none"> <li>- Complete rewrite to account for HOTMA rule.</li> <li>- Added HACA Policy: HACA now an MTW agency part of cohort 2-rent reform group. Implementation of stepped rent policy for eligible families. These families will not have annual reexaminations but triennial for information purposes only. See Cha. 6 Exh 6-0</li> </ul>
<b>11-3</b>	<b>11-I.B</b>	<b>Notification of Annual reexam</b>	- 11-2 annual performed in person	<ul style="list-style-type: none"> <li>- Renumbered.</li> <li>- Second line of HACA Policy changed. Annual reexam may be conducted virtually or in person.</li> <li>- Can be waived at PHA discretion.</li> </ul>
<b>11-4</b>	<b>11-I.C</b>		- Asked to bring in all information to reexam appointment	<ul style="list-style-type: none"> <li>- HACA Policy added mail or submit in person required information.</li> <li>- Deleted bring and the words to the reexam appointment</li> </ul>



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	12	Termination of Assistance and Tenancy		Revised policy, PHA will terminate assistance if family evicted from fed assisted housing (change number of years from five to three) Included term human trafficking with VAWA language.
12-7		Authorized reason to term assistance		- Highlighted area. According to HUD summary changed five years to three years. - No major changes except reformatting
	13	Owners		Revised policy HAP Contract Term for clarification. Included the term human trafficking with VAWA language.
13-4 13-5	13-I.A			- Added heading MTW Incentives. - Added HACA Policy re landlord incentive policies.(3) - authorized waiver additional landlord payments paid from HACA HAP funding. Not considered payment for rent or substitution for tenant fees.
13-6	13-I.B	Basic HCV Requirements		- Renumbered
13-21	13-II.E			- Deleted word Generally and inserted words, In all cases, HAP contract terminates at end of calendar month...
	14	Program Integrity		- 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. - No Changes
	15	Special Housing Types		Chapter now includes policies by default or where relevant rather than directing to the guide.
15-1		Introduction	PHA Policy families not permitted to use any special housing types unless as a reasonable accommodation for those with disabilities.	- HACA Policy deleted entire paragraph and inserted that HACA adopts Parts I-VII allowing use of all listed housing types.

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15-11	15-IV.A	<b>Part IV: Shared Housing</b>	PHA provides shared housing option including a list of for-profit or non-profit shared housing at briefing or upon request.	<ul style="list-style-type: none"> <li>- Replaced with PHA providing shared housing option information but not any listings or information of housing matching services in the community.</li> <li>- Deleted sentence stating including listing to families of for profit or non profit shared housing services...</li> <li>- Added families advised they can self search internet to find for profit or non profit shared housing services in the community.</li> </ul>
15-21	15-VII.A	<b>Part VII: Home</b>		<ul style="list-style-type: none"> <li>- HACA Policy paragraph added PHA requirement that financing of a home under the HCV Homeownership program be provided, insured, or guaranteed by the State or Federal government.</li> <li>- That there is compliance with secondary mortgage market underwriting requirements or with generally accepted private sector underwriting standards.</li> </ul>
15-22	15-VII.B		PHA policy families must meet criteria: no violations with HUD's Housing Quality standards with past year.	<ul style="list-style-type: none"> <li>- Under HACA Policy deleted criteria that families have had no violations of HUD's Housing Quality.</li> <li>- Replaced with no violations of - HUD's NSPIRE standards.</li> <li>- Add words The family has been resident of HACA for at least one year.</li> </ul>
15-24	15-VII.C			<ul style="list-style-type: none"> <li>- HACA policy deleted word 'will' and added word 'may'</li> <li>- Deleted word 'five' and added '25' new homeownerships units per year</li> <li>- Families participating in (deleted) 'an economic FSS, (replaced with) the HACA FSS for (deleted) 'six months' (added) 'one year'.</li> <li>- (Deleted) line Elderly and disabled families will automatically be given preference, (replaced with) Families who are residents at HACA RAD and a FSS participant who received a Tenant Mobility Voucher will be given preference over other families.</li> </ul>
15-25	15-VII.D			<ul style="list-style-type: none"> <li>- On line The unit must meet HQS. HQS replaced with NSPIRE.</li> </ul>
15-27	15-VII.E	<b>HACA Requirements</b>		<ul style="list-style-type: none"> <li>- HACA policy sentence added 'After the family completes homeownership counseling and all other preparatory steps and is ready to purchase a home....</li> </ul>

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15-28		Homeownership Counseling		- End of page HACA policy (added sentence) However, post-purchase homeowner counseling will be offered to program participants to promote long-term stability.
15-29		Home Inspections, Contract Sale, Disapproval of Seller		- HACA policy (deleted word will and inserted may. - (deleted) every other year and (added) as needed to ensure program compliance re: PHA conducting inspection while family receiving homeownership assistance.
15-31	15-VII.H			- Added 1% with parenthesis on the words one percent. - at HACA policy added sentence that does not appear to be completed.
15-32	15-VII.I			- HACA policy added 'only if there is reasonable belief there is a violation of terms of HAP contract as it relates to Homeownership Program' re: any inspections PHA conducts after initial inspection. - Deleted on an advisory basis. Family encouraged to make repairs but not as a condition of ongoing assistance.
15-33	15-VII.J		- Except for elderly and disable families assistance not received for more that 15 years on a 20 year term. Ten years in other cases.	- Deleted entire section adding 'HACA awarded MTW waiver extending terms to 30 years if household remains compliant. Term can be found in Exh 15-1.
15-35 15-36	15-J.K	HAP Payments and Homeownership Expenses		- HACA policy added Payment Standard for MTW Program, Deferred 2 <sup>nd</sup> Mortgage, Term of Mortgage.
15-37	15-VII.L	Portability		- Added HACA policy to accept families porting in with homeownership voucher. If family has completed requirements in initial PHA HACA will bill initial PHA at payment standard under MTW waiver.
	16	Program Administration	16-II.C(16-9), 16-IV.C(16-43),	Part II, update language to ensure reviews and hearings are accessible to participants Part IV repayment agreements Updating language and procedures for debts over \$10,000 No 2 <sup>nd</sup> repayment until 1 <sup>st</sup> is PIF

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				<ul style="list-style-type: none"> <li>• 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.</li> <li>• Included changes regarding exceptions to utility allowances as a reasonable accommodation.</li> <li>• Modified the policy on evidence for the informal hearing to eliminate the charge of copying documents related to the hearing.</li> <li>• 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.</li> </ul>
16-5	16-II.B	Payment Standards		<ul style="list-style-type: none"> <li>- Added HACA policy to include expanding basic range of 80%-120% of Fair Market Rent.</li> <li>- PHA may also seek Field Office approval rather than FMR as the baseline for the range.</li> </ul>
16-7				<ul style="list-style-type: none"> <li>- HACA policy added the words MTW modified basic range of 80-120%.</li> </ul>
16-24		Informal Hearing Officer		<ul style="list-style-type: none"> <li>- Added HACA Policy to include hearing officers: Senior Staff Members of HACA.</li> </ul>
16-34	16-IV.B	Repayment Agreements Involving Improper Payments		<ul style="list-style-type: none"> <li>- Was not seen in current edition.</li> </ul>
16-58 16-66 16-74	16-1 16-3 16-5	Exhibits		<ul style="list-style-type: none"> <li>- Added heading Housing Authority of the City of Asheville</li> </ul>

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	<b>17</b>	<b>Project-Based Vouchers</b>		<ul style="list-style-type: none"> <li>- Added Minor update accounting for Federal Register notice on subsidy layering</li> <li>- Minor clarifications on asset limitation requirements w/ HOTMA changes</li> <li>- Section X deleted</li> </ul>
17-7	17-II.B			- In HACA Policy added the words 'may and as applicable' re attaching PBVs to projects owned by PHA.
17-7 17-8 17-9	17-II.B	<b>Solicitation and Selection</b>		- Included two local newspapers used to advertise request for proposals for rehabilitated units, existing housing units, and that the PHA is accepting proposals.
17-10	17-II.B	<b>PHA-Owed Units</b>		- In the HACA policy added the City of AVL or HUD Field Office will be used to review selection process. That HACA has MTW waiver to perform rent determinations and inspections of its own units.
17-16	17-II.F	<b>Supportive Service</b>		<ul style="list-style-type: none"> <li>- Updated entire HACA policy to include seeking development partners for PBV housing exceeding 25% project cap. Inclusion of low-income, disabled, homeless or specific need families.</li> <li>- Policy lists specific types of services that meet the supportive services requirements.</li> <li>- Included ruling from recent American Community Survey Five-Year estimates.</li> </ul>
17-16		<b>Projects not Subject to Project Cap</b>		- Added HACA policy to include PHAs RAD PBV developments are exempt from cap.
17-16		<b>Promoting Partially Assisted Projects</b>		- Included in HACA policy PHA will provide assistance to excepted units.
17-17	17-II.G			- In HACA policy changed 20% census tracts to 25%.
17-24 17-25	17-III.D	<b>Inspecting PHA-Owed Units</b>		<ul style="list-style-type: none"> <li>- Added HACA policy to include AHA as MTW third party waiver approved. HACA to use trained staff to perform NSPIRE inspections of PBV units. This will not alter NSPIRE requirements.</li> <li>- Inclusion of Table showing min. number of QC inspections.</li> <li>-Third-party entity used at HUD's request.</li> </ul>
17-40	17-VI.C	<b>Organization of the Waiting List</b>		- HACA policy added word may to read PHA may establish...separate waiting lists.

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				- Added TPVs that are part of the PHA current waiting list along with PBV.
17-41	17-VI.D			- In HACA policy deleted words PBV (replaced with TBV) and particular regarding that PHA will not offer additional preferences for TBV program and PBV projects.
17-52	17-VII.C	<b>Emergency Transfers under VAWA</b>	- PHA adopted waiting list preference for victims in HCV and public housing programs (section 4-III.C)	- In HACA policy deleted the shown paragraph.
17-61				
17-65			- Exhibit 17-1 PBV Development	- 17-1 Deleted in its entirety
17-69			- Exhibit 17-2 Special provisions in TPV application	- 17-2 Deleted in its entirety
	18	<b>Project-Based Vouchers (PBV) Under the Rental Assistance Demonstration (RAD) Program</b>	- Chapter 18 was Not Applicable or used by the previous Administration.	- Added Chapter 18 in its entirety in clarification to the Applicable Regulations, PBV Percentage Limitation and Unit Cap, Inspecting Units, and Continuation of Housing Assistance Payments based on RAD notice. - Asset Limitation requirements to account for HOTMA changes. - Included term human trafficking with VAWA language to align with guidelines. - Replace Section X of Chapter 17.
	19	<b>Special Purpose Vouchers</b>	Removed HQS	Part VI added on Stability Vouchers Part II on Foster Youth to Independence now accounts for guidance [Notice PIH 2023-04] Included term human trafficking with VAWA.
19-1	19	<b>Introduction</b>		- In HACA policy added four types of special purpose vouchers the PHA will administer. FYI Program, VASH, Mainstream, and Non-Elderly Disabled.
19-2	19-I.A			- HACA policy added that PHA does not currently administer FUP vouchers.







## Chapter 13

Pg. 13-9 Conflict of Interest [24 CFR 982.161; HCV GB p. 8-19; Form HUD-52641, Section 13]

Such “covered individual” may not have any direct or indirect interest in the HAP contract or in any benefits or payments under the contract (including the interest of an immediate family member of such covered individual) while such person is a covered individual or for one year thereafter.

*Immediate family member* means the spouse, parent (including a stepparent), child (including a stepchild), grandparent, grandchild, sister, or brother (including a stepsister or stepbrother) of any covered individual.

## Chapter 15

Pg. 15-22 15-VII.B Family Eligibility [24 CFR 982.627]

In HACA policy: Families will be considered “continuously employed” if the break in employment does not exceed **four** months.

## **HOTMA**

HUD requires an update to the Administrative Plan to incorporate HOTMA by July 1, 2024, and that it be fully implemented by January 1, 2025. The proposed Administrative Plan should include HOTMA compliant updates. Additional HUD published information about HOTMA is linked at the end of this document.

## **NSPIRE**

HUD has mandated that physical inspections be conducted in accordance with National Standards for the Physical Inspection of Real Estate (NSPIRE) and that PHAs discontinue the use of HUD Housing Quality Standards (HQS) for inspection. NSPIRE standards prioritize health, safety, and functionality of assisted units. The proposed Administrative Plan should incorporate NSPIRE and remove all references to HQS. Additional HUD published information about NSPIRE is linked at the end of this document.