

FY 2027 Overview of Changes to HATC HCV Administrative Plan

Introduction

- Revised to account for most recent HOTMA guidance and updated NSPIRE compliance date.
- NSPIRE Compliance date: February 1, 2027

Chapter 1

- Contains clarifications for the HOTMA Voucher Final Rule, particularly as relevant to the contents of the plan.
- Revised history of the program section to include information on full HOTMA compliance. HOTMA Compliance date: January 1, 2027

Chapter 2

- Revised equal access language to account for Executive Order 14168.
- Revised policy language on serving limited English proficient (LEP) persons in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25.
- Clarified language as to what requirements apply in light of recent executive orders and proposed rules.
- Elaborated policy language on how to file a discrimination complaint.
- Clarified language regarding enforcement actions on national origin discrimination per FHEO memo 9/19/25.

Chapter 3

- Contains clarifications on compliance of consent to release of information per Notice PIH 2024-38.
- Revised to account for updated HUD guidance on use of arrest records set forth in Notice PIH 2025-26.
- Added clarification regarding criminal background checks per Notice PIH 2012-28.
- Removed language calling out policy that will apply upon the HOTMA compliance date.
- *PHA Policy*: Clarifies per HUD requirements that arrest records can be used as the sole basis in determining eligibility.
- *PHA Policy*: Proof of citizenship will be required for each family member.

Chapter 4

- Revised policy language on limited English proficient (LEP) persons in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25.
- *PHA Policy*: Clarifies that an informal hearing is not granted for applicants not selected through the lottery selection process.
- *PHA Policy*: Clarifies that the PHA will notify families of the lottery selection within 10 business days of their placement on the list.
- *PHA Policy*: Clarifies that the PHA will require a referral from the corresponding agency when a special purpose voucher is available.

Chapter 5

- Revised language on limited English proficient (LEP) persons in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25.
- Clarified language to reflect updated VAWA forms.
- Clarified that the PHA may rescind the voucher for insufficient funding with HUD approval.

- *PHA Policy*: Per PIH 2025-08, FUP vouchers must be automatically extended for 90 days. Total FUP voucher with extensions – 270 days. Request may be in writing or orally but must be requested prior to voucher expiration.
- *PHA Policy*: Redefines the number of extensions and duration for all other vouchers from two 30-day extensions to one 60-day extension. Total voucher extension – 180 days. Request may be in writing or orally but must be requested prior to voucher expiration.

Chapter 6

Chapter 6.A. is pre HOTMA and is omitted effective 1/1/2027.

Chapter 6.B includes the following changes:

- *Chapter 6.B is now Chapter 6. HOTMA Policy included.*
- Removal of policy language regarding the Earned Income Disallowance, as this has now fully sunset.
- Updated for inflationary adjustments.
- Updated how Earned Income is defined to include day laborer work as income.
- Minor clarifications regarding student financial assistance.
- Clarifications regarding alimony and child support per Notice PIH 2023-27 and answers received from Hotmaquestions@hud.gov.
- Clarifications on phased-in relief for hardship exemptions based on answers received from Hotmaquestions@hud.gov.
- *PHA Policy*: Defines when and how child support will be counted to determine annual income.
- *PHA Policy*: Clarifies process for maintaining personally identifiable information (PII) and specific medical diagnosis confidential.
- *PHA Policy*: Defines minimum rent for VASH to \$0.
- *PHA Policy*: Defines eligible auxiliary apparatus for persons with disabilities such as including the cost of caring for an approved service animal.

Chapter 7

Chapter 7.A. is pre HOTMA and is omitted effective 1/1/2027.

Chapter 7.B includes the following changes:

- *Chapter 7.B is now Chapter 7. HOTMA Policy included.*
- Policy clarifications on the treatment of income based on answers received from Hotmaquestions@hud.gov.
- Updated for inflationary adjustments.
- Aligned HUD policy on who and when HUD 9886- A Authorization for Release Information is required to be signed.
- Clarifications on citizenship or eligible immigration status in accordance with HUD Secretary Letter 12/16/25.
- Defined the PHA process for verifying eligible immigrants.
- Defined frequency of reviewing deceased report as monthly and provides the process on how to properly report deceased tenants.
- Minor clarifications regarding verification of student financial assistance.
- Clarified language to reflect updated VAWA forms.
- *PHA Policy*: Clarifies procedures related to families granting consent to the PHA for distribution of EIV reports.
- *PHA Policy*: Removes MTW activity that accepted self-certification of assets totaling \$50,000 or less and includes the need to verify assets via third party regardless of the amount at intake and for each new family member added.
- *PHA Policy*: Requires all adults turning 18 years of age to sign the required 9886-A form within 30 days of turning 18.

- *PHA Policy*: Self certification from a family as verification of assets disposed of for less than fair market value is acceptable.
- *PHA Policy*: Policy change requiring proof of citizenship for all family members.
- *PHA Policy*: The PHA will accept the family's self-certification of the value of family assets and anticipated asset income when the family's assets do not exceed the HUD published threshold. If it does exceed the threshold, families will be required to provide third party verifications.

Chapter 8

Chapter 8.A includes the following changes:

- Updated NSPIRE compliance date. February 1, 2027
- Revised section on NSPIRE standards applicable to HQS to account for requirements in Notice PIH 2024-26, REV-1.
- Revised additional content to bring policies current to HAP contracts executed or renewed June 6, 2024 or later.
- Removal of incorrect language on rent increases.

Chapter 8.B includes the following changes:

- Updated NSPIRE compliance date.
- Updated citations related to life-threatening deficiencies.
- Revised additional content to bring policies current to HAP contracts executed or renewed June 6, 2024 or later.
- Removal of incorrect language on rent increases.

Chapter 9

- Added section on PHA Leasing Assistance for Families in accordance with Notice PIH 2022-18.
- *PHA Policy*: The PHA will not utilize Unrestricted Net Position or ongoing administrative fees to pay for security deposits, utility deposits, assistance with application fees, or holding fees.

Chapter 10

- This chapter contains only minor updates to bring the content current.

Chapter 11

Chapter 11.A is pre HOTMA and is omitted effective 1/1/2027.

Chapter 11.B is now Chapter 11. HOTMA Policy included.

- Policy clarifications based on answers received from Hotmaquestions@hud.gov.
- Revised policy language on limited English proficient (LEP) persons in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25.
- Changes regarding conducting interim reexaminations per Notice PIH 2023-27, revision 3.
- *PHA Policy*: Clarifies steps for processing an annual/ biennial reexamination.
- *PHA Policy*: Removes interim policy under MTW status for processing change of household composition only at reexamination. Per Notice PIH 2026-09, PHAs are required to conduct changes in family composition when they occur regardless if results in a decrease, increase, or no change in the family's annual adjusted income.

Chapter 12

- Contains clarifications on compliance of consent to release of information per Notice PIH 2024-38.
- Revised to account for updated HUD guidance on use of arrest records set forth in Notice PIH 2025-26.
- Revisions regarding death of a sole family member and family absence from the unit per Notice PIH 2026-11.
- Removed language calling out policy that will apply upon the HOTMA compliance date.

- Policy revisions regarding insufficient funding per Notice PIH 2026-12, Revision 2.
- *PHA Policy*: Under the MTW initiative, the PHA extends the termination period for zero HAP families from 180 days to 12 months for FSS participants. Termination may occur only after 12 consecutive months of zero housing assistance.
- *PHA Policy*: Added actions the PHA will take to reduce costs when there is insufficient funding.

Chapter 13

- Added section on owner incentive/retention payments in accordance with Notice PIH 2022-18.
- Added policy language to comply with HUD requirements and for ease of administration.
- *PHA Policy*: Removed MTW activity to pay landlord incentives from Chapter 9 and placed in chapter 13. Reduce landlord incentive from \$1000 to \$500 and will only be issued to landlords leasing in high opportunity areas.

Chapter 14

- Revised amount of federal awards required to have an independent audit.

Chapter 15

- Added section on use of exception payment standards in line with Notice PIH 2025-12.

Chapter 16

- Clarified reasonable accommodation language in line with Notice PIH 2025-12.
Revised language on language assistance in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25.
- Clarified record retention language on equal access to account for Executive Order 14168.
- Revised language on medical and disability records citing Notice PIH 2010-26.
- Clarified language to reflect updated VAWA forms and included sample versions of new forms.
- *PHA Policy*: Updated HATC's VAWA Emergency Plan for all programs served.

Chapter 17

- Revised language on language assistance in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25.

Chapter 18

- Multiple sections of this chapter have been revised to align with Notice PIH 2019-23, REV-4.
- Updated language in accordance with the 2/26/25 interim final rule rescinding the 30-day notice of nonpayment of rent.

Chapter 19

- Updated FUP and FYI sections to bring current with Notice PIH 2025-08.
- Revised language regarding limited English proficient persons and language assistance in accordance with Executive Order 14224 and Office of Attorney General (OAG) Memo 7/14/25.
- Removed language on SSN and citizen status verification for the Stability Voucher program per Notice PIH 2026-05.
- *PHA Policy*: For FUP vouchers, in accordance with PIH 2025-08, an automatic 90-day extension will be granted if requested prior to voucher expiration. Extensions beyond the 90-day extension will follow PHA policies on voucher extensions in Chapter 5.

Glossary

- Revised definitions.
- Updated acronyms section.
- Removed pre-HOTMA definitions and language calling out definitions that will apply upon the HOTMA compliance date.

Appendix

- Removed appendix for HOTMA.

Temporary Policy Supplement for Emergency Housing Vouchers (EHVs)

- Revised TPS for EHV's with updated information contained in Notices PIH 2025-07 and PIH 2025-19.
- Removed service fees as they are no longer applicable.