



Housing Choice Voucher Administrative Plan Revisions

Effective January 1, 2025

The Administrative Plan

The U.S. Department of Housing and Urban Development (HUD) requires the Housing Authority of Washington County (HAWC), also known as the Public Housing Authority (PHA), to revise and update the Housing Choice Voucher Program Administrative Plan whenever necessary to incorporate changes in federal law, HUD regulations, or legal operating procedures. This proposed Housing Choice Voucher Program Administrative Plan includes mandatory updates to comply with the Housing Opportunity through Modernization Act (HOTMA) and to incorporate National Standards for Physical Inspection of Real Estate (NSPIRE) as required by Federal Regulations.

Housing Opportunity Through Modernization Act (HOTMA)

The Housing Opportunity through Modernization Act (HOTMA) makes changes to the Housing Choice Voucher program that streamline income and asset verifications and recertification schedules. The proposed Administrative Plan includes HOTMA compliant updates. Additional HUD published information about HOTMA is linked at the end of this document.

Summary of Changes:

Changes to the Administrative Plan that make updates to departmental policy are highlighted below.

Introduction

	<i>Section:</i>	<i>Proposed Change:</i>	Mandatory <input checked="" type="checkbox"/>	HOTMA <input checked="" type="checkbox"/>
Introduction	About the Administrative Plan	Add information about HOTMA implementation	Discretionary <input type="checkbox"/>	
Proposed Policy:	The proposed policy adds language to the introduction about HOTMA implementation stating that “The proposed Administrative Plan includes HOTMA compliant updates as required by HUD, however, many of these changes require extensive updates to HUD reporting software prior to implementation. The HOTMA compliance date will be determined following HUD guidance regarding the timing of the necessary HUD software updates. HAWC will notify all program participants of the HOTMA compliance date once it is determined.”			
Current Policy:	This is new language to the introduction of the Administrative Plan. The Administrative Plan does not currently explain that HOTMA implementation is dependent on HUD software upgrades currently in progress or comply with HUD guidance directing the PHA to include notification of the HOTMA compliance date in the Administrative Plan.			

Chapter 1: Overview of the Program and Plan Introduction

	Section:	Proposed Change:	Mandatory <input type="checkbox"/>	HOTMA <input type="checkbox"/>
Chapter 1	1-I.C	Update Strategic Framework	Discretionary <input checked="" type="checkbox"/>	
Proposed Policy:	The updated departmental strategic framework articulating the HAWC vision, mission, values, and equity statement has been added to the Administrative Plan. This is a discretionary change to ensure HAWC values are reflected in the Administrative Plan.			
Current Policy:	At present, the document contains HAWC's previous mission statement. The current administrative plan does not include information on HAWC's vision, values, or equity goals.			

Chapter 5: Briefings and Voucher Issuance

	Section:	Proposed Change:	Mandatory <input checked="" type="checkbox"/>	HOTMA <input type="checkbox"/>
Chapter 5	5-II.E	Create alternative mainstream voucher extension policy	Discretionary <input type="checkbox"/>	
Proposed Policy:	Mainstream Vouchers are special purpose vouchers for non-elderly persons with disabilities. Funding and reporting for Mainstream Vouchers is separate from the HCV program. The proposed policy adds this language "The Mainstream Voucher may be extended an additional 90 days. The first extension request will be granted if it is made on or before the term expiration date. Extension requests may be made verbally or in writing. The PHA will notify the participant prior to the initial term expiration date to remind them of the term expiration date, the process for requesting an extension, and to inquire if the family needs assistance with their housing search." This complies with guidance from HUD on Mainstream Voucher administration (PIH Notice 2024-30)			
Current Policy:	Under the current policy, Mainstream Voucher extension requests are administered under the same rules as the Housing Choice Voucher.			

Chapter 6: Income and Subsidy Determinations

	Section:	Proposed Change:	Mandatory <input checked="" type="checkbox"/>	HOTMA <input checked="" type="checkbox"/>
Chapter 6	6-II.B	Add language indicating the dependent deduction will be updated annually by HUD	Discretionary <input type="checkbox"/>	
Proposed Policy:	The proposed policy adds this language " Following the implementation of HOTMA, the amount of the dependent allowance will be adjusted by HUD annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers, rounded to the next lowest multiple of \$25". This complies with mandatory changes required by HOTMA.			
Current Policy:	The current policy does not include language describing the annual dependent allowance adjustment under HOTMA			

	Section:	Proposed Change:	Mandatory <input checked="" type="checkbox"/>	HOTMA <input checked="" type="checkbox"/>
Chapter 6	6-II.C	Add language indicating the elderly/disabled household allowance will be updated annually by HUD	Discretionary <input type="checkbox"/>	

Proposed Policy:	The proposed policy adds this language " Following the implementation of HOTMA the amount of the elderly/disabled household allowance will be adjusted by HUD annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers, rounded to the next lowest multiple of \$25." This complies with mandatory changes required by HOTMA.
Current Policy:	The current policy does not include language describing the annual elderly/disabled household allowance adjustment.

Chapter 7: Verification

	Section:	Proposed Change:	Mandatory <input type="checkbox"/>	HOTMA <input type="checkbox"/>
Chapter 7	7-II.A	Clarify that PHA will accept standard and Real ID act compliant identification	Discretionary <input checked="" type="checkbox"/>	

Proposed Policy:	The updated policy adds this language "The PHA will accept both standard and Real ID Act Compliant cards issued by the Department of Motor Vehicles, provided that they are valid and unexpired." This is a discretionary change to ensure that the Real ID Act will not create obstacles to program participation.
Current Policy:	The current policy does not clarify that the PHA will accept both standard and Real ID Act compliant forms of state issued identification.

Chapter 8: National Standards for the Physical Inspection of Real Estate (NSPIRE) and Rent Reasonableness Determinations

	Section:	Proposed Change:	Mandatory <input type="checkbox"/>	HOTMA <input type="checkbox"/>
Chapter 8	8-II.A	Add language related to access to the unit	Discretionary <input checked="" type="checkbox"/>	

Proposed Policy:	The updated policy adds this language "Access to the unit may be provided by any adult member of the household, by an adult designated by the head of household, or by the property owner. Unaccompanied minors may not provide access to the unit. Failure to provide access to the unit during any two consecutive scheduled inspections may result in termination of assistance." This clarifies, but does not alter the PHA's approach to program enforcement.
Current Policy:	The current policy does not include language clarifying who may provide access to a unit or the potential consequences of failure to provide access to a unit for inspection.

	Section:	Proposed Change:	Mandatory <input type="checkbox"/>	HOTMA <input type="checkbox"/>
Chapter 8	8-II.A	Remove language restricting the PHA from rescheduling inspection appointments	Discretionary <input checked="" type="checkbox"/>	

Proposed Policy:	The updated policy removes this language: "The PHA will not reschedule inspection appointments, except for credible, verifiable emergencies." This language is unnecessarily restrictive, and too subjective to be actionable by the PHA or informative to participating households.
Current Policy:	The current policy states "The PHA will not reschedule inspection appointments, except for credible, verifiable emergencies."

Chapter 10: Moving with Continued Assistance and Portability

	Section:	Proposed Change:	Mandatory <input type="checkbox"/>	HOTMA <input type="checkbox"/>
Chapter 10	10-II.B	Modify portability restrictions for households issued Tenant Protection Vouchers due to Section 18 Disposition	Discretionary <input checked="" type="checkbox"/>	

Proposed Policy:	The proposed policy exempts households issued Tenant Protection Vouchers due to disposition of their Public Housing units under Section 18 of the U.S. Housing Act of 1937 from a PHA rule requiring non-resident applicants to the housing choice voucher program to lease a unit in the PHA's jurisdiction for at least 12 months before requesting portability.
Current Policy:	The current policy does not exempt households issued Tenant Protection Vouchers due to disposition of their Public Housing units from the PHA rule requiring non-resident applicants to the housing choice voucher program to lease a unit in the PHA's jurisdiction for at least 12 months before requesting portability.

Chapter 11A and 11B: Reexaminations

	Section:	Proposed Change:	Mandatory <input type="checkbox"/>	HOTMA <input type="checkbox"/>
Chapter 11A and 11B	11A-I.C 11A-I.D	State that recertifications may be conducted through an online platform	Discretionary <input checked="" type="checkbox"/>	

Proposed Policy:	The proposed policy states that in general, the PHA will complete the Annual Reexamination through an online platform. It also states that participants may request an alternate format for their reexamination (such as recertification by mailed packet or by interview) as needed. It also removes outdated information requiring households to attend in-person interviews to complete their reexaminations.
Current Policy:	The current policy does not state that an online platform will be used for reexamination of income and family composition

Chapter 12: Termination of Assistance and Tenancy

	Section:	Proposed Change:	Mandatory <input type="checkbox"/>	HOTMA <input type="checkbox"/>
Chapter 12	Exhibit 12-1 (Statement of Family Obligations)	Add language regarding inspection attendance and unit access	Discretionary <input checked="" type="checkbox"/>	
Proposed Policy:	The proposed policy adds this language "A failure to provide access to the unit during any two consecutive scheduled inspections may result in termination of assistance. Access may be provided by any adult member of the household, by an adult designated by the head of household, or by the property owner." This clarifies, but does not modify, current practice.			
Current Policy:	The current policy states the family obligation to allow the PHA to inspect the unit at reasonable times and after reasonable notice, but does not articulate who may provide access or the risk of program termination if a household does not provide access for inspection.			

Chapter 17: Project-Based Vouchers (PBV)

	Section:	Proposed Change:	Mandatory <input type="checkbox"/>	HOTMA <input type="checkbox"/>
Chapter 17	17-VI.C	Update section on waiting list management to describe the use of the General Waiting List for Project-Based Vouchers (PBV)	Discretionary <input checked="" type="checkbox"/>	
Proposed Policy:	The proposed policy adds this language describing the General PBV Waiting List: "In September 2022 the PHA established a General PBV Waiting List. PBV units at sites leasing on or after September 2022 will use the General PBV Waiting List. Projects with Site-Specific Waiting Lists established prior to September 2022 will continue to use the site-specific waiting lists until they are exhausted, after which they will transition to use the General PBV Waiting List." It also adds this language describing the use of Site-Specific Waiting Lists: "The PHA maintains and manages separate Site-Specific Waiting Lists for individual projects or buildings that began receiving PBV assistance prior to September 2022. When these waiting lists are exhausted, the sites will transition to using the General PBV Waiting List." These additions clarify the application of these two HUD approved waiting list management approaches. They do not alter current practice.			
Current Policy:	The current policy does not clearly describe the application of the site-specific and general waiting lists as established in 2022.			

	Section:	Proposed Change:	Mandatory <input type="checkbox"/>	HOTMA <input type="checkbox"/>
Chapter 17	17-VI.E Refusal of Offer	Update section on Refusal of offer to reflect differences in Site Specific and General Project-Based Voucher (PBV) waiting list management	Discretionary <input checked="" type="checkbox"/>	
Proposed Policy:	<p>The proposed policy adds this language describing the General PBV Waiting List: “If a household refuses two offers of PBV assistance from the General PBV waiting list the household will be removed from the General PBV waiting list. Offer refusals due to accessibility needs protected under the ADA (Americans with Disabilities Act) or due to a VAWA (Violence Against Women’s Act) protected circumstance will not be counted towards the two-offer limit.”</p> <p>It also adds this language describing the use of Site-Specific Waiting Lists: “If a household refuses an offer of PBV assistance from a site-specific waiting list, the household will be removed from that site-specific waiting list. This will not apply to households that refuse a unit offer due to accessibility needs protected under the ADA, or for safety reasons due to a VAWA protected circumstance.”</p> <p>This language complies with HUD mandates and describes current PHA practice.</p>			
Current Policy:	<p>The current policy does not state policies for waiting list removal following an applicant’s refusal of assistance, or clarify HAWC’s responsibility in circumstances protected by the ADA or VAWA.</p>			

	Section:	Proposed Change:	Mandatory <input type="checkbox"/>	HOTMA <input type="checkbox"/>
Chapter 17	17-VI.E Disapproval by Landlord	Update section on Refusal of offer to reflect differences in Site Specific and General Project-Based Voucher (PBV) waiting list management	Discretionary <input checked="" type="checkbox"/>	
Proposed Policy:	<p>The proposed policy adds this language describing the General PBV Waiting List: “If a PBV owner rejects an applicant for admission to the owner’s units, the applicant will not be removed from the General PBV Waiting List. Disapproval by the Landlord will not count as a refusal by the applicant. .”</p> <p>It also adds this language describing the use of Site-Specific Waiting Lists: “If a PBV owner rejects an applicant for admission to the owner’s units the applicant will be removed from the waiting list for that site. The applicant will not be removed from other waiting lists due to disapproval by landlord.”</p> <p>This language complies with HUD mandates and describes current PHA practice.</p>			
Current Policy:	<p>The current policy does not state policies for waiting list removal following an applicant’s refusal of assistance, or clarify HAWC’s responsibility in circumstances protected by the ADA or VAWA.</p>			

References:

More information on HOTMA can be found by following the links below.

PIH Notice 2023-27 Implementation Guidance: Sections 102 and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA)

<https://www.hud.gov/sites/dfiles/OCHCO/documents/2023-27pihn.pdf>