

**Exhibit B.1-2**  
**Summary of Significant Changes to RRHA’s Admissions & Continued Occupancy Policy (“ACOP”)**  
**FY 2026**

**IMPORTANT NOTE: RRHA’S ACOP FORMAT HAS CHANGED TO THE NAN MCKAY’S ACOP MODEL. The ACOP Chapters 1 through 24 have been condensed to Chapters 1 through 17. Please see below a chart with the chapter breakdown. Following this chart is the summary of significant changes.**

2024-2025 OLD Chapter/Section	2025-2026 NEW Chapter	2024-2025 OLD Chapter/Section	2025-2026 NEW Chapter	2024-2025 OLD Chapter/Section	2025-2026 NEW Chapter
Chapter 1 – Statement of Policies and Objectives	Chapter 1 – Overview of the Program and Plan	Chapter 10- Income and Adjusted Income	Chapter 6 – Income and Rent Determinations (A and B)	Chapter 19 Debts to RRHA	Chapter 16 – Program Administration
Chapter 2 – Fair Housing	Chapter 2 – Fair Housing and Equal Opportunity	Chapter 11 – Verification Procedures	Chapter 7 – Verifications (Both A and B)	Chapter 20 – Program Integrity	Chapter 15 – Program Integrity
Chapter 3 – Reasonable Accommodation Policy	Chapter 2 – Fair Housing and Equal Opportunity	Chapter 12-Reexaminations	Chapter 9 – Reexaminations (Both A and B)	Chapter 21 – Lease Termination	Chapter 13 – Lease Terminations
Chapter 4 – Applying for Admissions	Chapter 4 – Applications, Waiting List and Tenant Selection	Chapter 13 – Inspection, Repair, and Maintenance of Dwelling Units	Chapter 8 – Leasing and Inspections	Chapter 22 Eviction Policy and Procedures	Chapter 13 – Lease Termination
Chapter 5 – Eligibility and Screening	Chapter 3 – Eligibility	Chapter 14 – Lead Based Paint Policy	Chapter 16 – Program Administration	Chapter 23 – Tenant Grievance Procedure	Chapter 14 – Grievances and Appeals
Chapter 6 – Tenant Selection and Assignment Plan	Chapter 4 – Applications, Waiting List and Tenant Selection	Chapter 15- Transfer Policy	Chapter 12 – Transfer Policy s	Chapter 24 – Criminal Records Management	Chapter 3 - Eligibility
Chapter 7 – Occupancy	Chapter 5 – Occupancy Standards and Unit Offers	Chapter 16 – Relocation Policy	Chapter 17 – Relocation Policy		
Chapter 8 – Leasing	Chapter 8 – Leasing and Inspections	Chapter 17 – Pet Policy	Chapter 10 - Pets		
Chapter 9 – Rent	Chapter 6 – Income and Rent Determinations (A and B)	Chapter 18 – Community Service and Self-Sufficiency Requirement (CSSR) Policy	Chapter 11 – Community Service		

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**\*\*IMPORTANT NOTE: Throughout the ACOP, references to requests being in writing include the option of submission through the Rent Café Portal. This chart references only significant changes to policies and procedures in the ACOP. Although the wording may have changed due to using the Nan McKay model template any change not mentioned below indicates that the policies did not have a significant change.\*\***

2024-2025 OLD Chapter/Section	2024-2025 OLD Page	2024-2025 OLD Previous Language	2025-2026 NEW Chapter	2025-2026 NEW Page/Section	Proposed Language	Reason/ Justification
<b>Chapter 1 – Statement of Policies and Objectives</b>			<b><u>Introduction</u></b>	Intro – i	Update regarding HOTMA and the impact on the ACOP	Housing Opportunities through Modernization Act (HOTMA) Update
<b><u>Chapter 2 – Fair Housing</u></b>	12	Housing assisted by HUD or insured by FHA shall be made available without regard to actual or perceived sexual orientation, gender identity, or marital status. 24 C.F.R. § 5.105 RRHA will not discriminate against people who identify as lesbian, gay, bisexual, or transgender/gender non-conforming (collectively, “LGBT”). Effective March 5, 2012, The Final Rule provides for equal access to HUD assisted or –insured housing. 1. Eligibility for HUD-assisted or –insured housing A determination of eligibility for housing that is assisted by HUD or subject to a mortgage insured by the Federal Housing Administration shall be made in accordance with the eligibility requirements provided for such program by and such housing shall be made available without regard to actual or perceived sexual orientation, gender identity or expression, or marital status. 2. Prohibition of inquiries on sexual orientation or gender identity No owner or administrator of HUD-assisted or HUD-insured housing, approved	<b><u>Chapter 2 – Fair Housing and Equal Opportunity, Part I, Section 2-I</u></b>	2-6	<p>Notice PIH 2014-20 requires an articulated complaint process for allegations of discrimination under the Equal Access Final rule. The Equal Access Final Rule requires that PHAs provide equal access regardless of marital status, gender identity, or sexual orientation. The PHA will be informed on these obligations by the HUD Field Office or FHEO when an Equal Access complaint investigation begins.</p> <p><b>RRHA Policy</b></p> <p>Applicants or tenant families who believe that they have been subject to unlawful discrimination based on marital status, gender identity, or sexual orientation under the Equal Access Rule may notify the RRHA either orally or in writing.</p> <p>Within 10 business days of receiving the complaint, RRHA will provide a written notice to those alleged to have violated the rule. RRHA will also send a written notice to the complainant informing them that notice was sent to those alleged to have violated the rule, as well as information on how to complete and submit a housing discrimination complaint form to HUD’s Office of Fair Housing and Equal Opportunity (FHEO).</p> <p>The RRHA will attempt to remedy discrimination complaints made against RRHA and will conduct an investigation into all allegations of discrimination.</p>	HUD Regulation

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		<p>lender in an FHA mortgage insurance program, nor any (or any other) recipient or sub-recipient of HUD funds may inquire about the sexual orientation or gender identity/expression of an applicant for, or occupant of, HUD-assisted housing or housing whose financing is insured by HUD, whether renter- or owner-occupied, for the purpose of determining eligibility for the housing or otherwise making such housing available. This prohibition on inquiries regarding sexual orientation or gender identity does not prohibit any individual from voluntarily self-identifying as a particular sexual orientation or gender identity/expression. This prohibition on inquiries does not prohibit lawful inquiries of an applicant or occupant’s sex where the housing provided or to be provided to the individual is temporary, emergency shelter that involves the sharing of sleeping areas or bathrooms, or inquiries made for the purpose of determining the number of bedrooms to which a household may be entitled.</p>			<p>Within 10 business days following the conclusion of the RRHA’s investigation, RRHA will provide the complainant and those alleged to have violated the rule with findings and either a proposed corrective action plan or an explanation of why corrective action is not warranted.</p> <p>RRHA will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)</p>	
<p><b><u>Chapter 2 – Fair Housing</u></b></p>	<p>No previous language for this chapter</p>	<p>No previous language for this chapter</p>	<p><b><u>Chapter 2- Fair Housing and Equal Opportunity, Part II, Section 2-II</u></b></p>	<p>2-10</p>	<p>RRHA will provide a Notice of Reasonable Accommodations, an Accessibility Needs Survey and Notice of Availability of Auxiliary Aids and Services to assess the needs of its residents, applicants, and participants to improve services for individuals with disabilities and to inform all RRHA residents, applicants, and participants of their rights to equal access to RRHA’s programs, services, activities, and properties, no matter their disability.</p>	<p>To comply with Voluntary Compliance Agreement (VCA) with HUD, executed in October 2024.</p>

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					RRHA’s 504 Coordinator may be contacted at 804-780-4276 or at <a href="mailto:compliance@rrha.com">compliance@rrha.com</a>	
<b><u>Chapter 2 – Fair Housing</u></b>	No previous language for this chapter	No previous language for this chapter	<b><u>Chapter 2 – Fair Housing and Equal Opportunity, Part II, Section 2-II.F</u></b>	2-16	<p>HUD regulations require the PHA to take reasonable steps to ensure that persons with disabilities related to hearing and vision have reasonable access to the PHA’s programs and services [24 CFR 8.6].</p> <p>At the initial point of contact with each applicant, the PHA shall inform all applicants of alternative forms of communication that can be used other than plain language paperwork- by <u>providing a Notice of Reasonable Accommodation and Auxiliary Aids and Services.</u></p> <p><u>RRHA Policy</u></p> <p>To meet the needs of persons with hearing impairments, TTD/TTY (text telephone display / teletype) <u>7-1-1</u> communication will be available.</p> <p>To meet the needs of persons with vision impairments, large-print and audio versions of key program documents will be made available upon request. When visual aids are used in public meetings or presentations, or in meetings with PHA staff, one-on-one assistance will be provided upon request.</p> <p>Additional examples of alternative forms of communication are sign language interpretation or having material explained orally by staff.</p> <p>RRHA will not require applicants, residents, or program participants to bring a person with them to interpret for him or her. RRHA will not rely on an adult accompanying an individual with disabilities unless 1) there is an emergency involving imminent threat to the safety or welfare of an individual or the public where there is no interpreter available; or 2) where the individual with a disability specifically requests</p>	To comply with Voluntary Compliance Agreement (VCA) with HUD, executed in October 2024.

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					that the accompanying adult interpret or facilitate communication, the accompanying adult agrees to provide such assistance, and reliance on that adult for such assistance is appropriate under the circumstances. RRHA reserves the right to not rely on an accompanying adult to interpret where there is reason to doubt the person’s impartiality or effectiveness.	
<b><u>Exhibit #2</u></b>	296	Reasonable Accommodation Policy and Procedure  Service and Assistance Animal Policy	<b><u>Chapter 2 – Fair Housing and Equal Opportunity, Exhibit 2-3</u></b>  <b><u>Exhibit 2-4</u></b>	2-34  2-56	<b>Multiples revisions to the Reasonable Accommodation Policy and Procedure</b>  <b>Separated the Service and Assistance Animal Policy from the Reasonable Accommodation Policy and made revisions so it can be a standalone policy</b>	To comply with Voluntary Compliance Agreement (VCA) with HUD, executed in October 2024.
<b><u>Chapter 2- Fair Housing</u></b>	No previous language for this chapter	No previous language for this chapter	<b><u>Chapter 2 – Fair Housing and Equal Opportunity, Exhibit 2-4</u></b>	2-58	<b>NEW: Effective Communication Policy and Procedure</b>	To comply with Voluntary Compliance Agreement (VCA) with HUD, executed in October 2024.
<b><u>Chapter 5 – Eligibility and Screening</u></b>	35	The applicant must qualify as a “family.” For this purpose, the term “family” includes, but is not limited to, the following, regardless of the actual or perceived sexual orientation, gender identity or expression, or marital status of any member of the prospective family [24 C.F.R. § 5.403]: a. A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single	<b><u>Chapter 3 – Eligibility Part I, Section 3-I.B.</u></b>	3-2	<i>Family</i> as defined by HUD, includes but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status, a single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; <b>an otherwise eligible youth who has attained at least 18 years of age and not more than 24 years of age and who has left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act (42 U.S.C. 675(5)(H)), and is homeless or is at risk of becoming homeless at age 16 or older...</b>	Housing Opportunities through Modernization Act (HOTMA) Update

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		person; or two or more persons who may not be related by blood, marriage, adoption, or other operation of law, but who either can demonstrate that they have lived together previously or can verify stable shared income or resources that will be available to meet the needs of the family...				
<u>Chapter 5 – Eligibility and Screening</u>	35	N/A	<u>Chapter 3 – Eligibility Part I, Section 3-I.B.</u>	3-2	<b>NEW: Household is a broader term that includes additional people who, with the PHA’s permission, live in a public housing unit, such as live-in aides, foster children, and foster adults.</b>	Housing Opportunities through Modernization Act (HOTMA) Update
<u>Chapter 12 – Reexaminations</u>	149	No previous language for this chapter	<u>Chapter 3 – Eligibility, Part I, Section 3-I.J.</u>	3-7	Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the public housing unit 51% percent of the time, are not subject to the time limitations of guests as described above.	To avoid dual subsidy
<u>Chapter 5 – Eligibility and Screening</u>	38	Foster adults are usually persons with disabilities, unrelated to the tenant family, who are unable to live alone [24 § 5.609]. The term foster child is not specifically defined by applicable law. For the purpose of this ACOP, a foster child is a child that is in the legal guardianship or custody of a state, county, or private adoption or foster care agency, yet is cared for by foster parents in their own homes, under some kind of short-term or long-term foster care	<u>Chapter 3 – Eligibility Part I, Section 3-I.K.</u>	3-8	<b>A foster adult is a member of the household who is 18 years of age or older and meets the definition of a foster adult under state law. In general, a foster adult is a person who is 18 years of age or older, is unable to live independently due to a debilitating physical or mental condition, and is placed with the family by an authorized placement agency or by judgment, decree, or other order of any court of competent jurisdiction.</b>  <b>A foster child is a member of the household who meets the definition of a foster child under state law. In general, a foster child is placed with the family by an authorized placement agency (e.g., public child welfare agency) or by judgment, decree, or other order of any court of competent jurisdiction.</b>	Housing Opportunities through Modernization Act (HOTMA) Update

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		arrangement with the custodial agency				
<b><u>Chapter 5 – Eligibility and Screening</u></b>	38	No previous language for this chapter	<b><u>Chapter 3 – Eligibility Part I, Section 3-I.K.</u></b>	3-8	<p>For purposes of continued occupancy, the term “family” also includes the remaining member of a participant family, if such remaining member possesses the legal capacity necessary to execute a lease.</p> <p>Third-party verification from the state or local government agency responsible for the placement of an individual with the family is required to verify that the individual is a foster child or adult of the family.</p>	Clarification
<b><u>Chapter 5 – Eligibility and Screening</u></b>	42	RRHA has the right to disapprove a request for a live-in aide based on the "Other Eligibility Criteria" described in this Chapter.	<b><u>Chapter 3, Part I, Section 3-I.M</u></b>	3-11	<p>RRHA has the discretion not to approve a particular person as a live-in aide, and may withdraw such approval, if [24 CFR 966.4(d)(3)(i)]:</p> <ul style="list-style-type: none"> <li>The person commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;</li> <li>The person has a history of drug-related criminal activity or violent criminal activity; or</li> <li>The person currently owes rent or other amounts to the PHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.</li> </ul>	HUD Regulation
<b><u>Chapter 11- Verifications</u></b>	124	N/A	<b><u>Chapter 3 – Eligibility Part II, Section 3-II.D.</u></b>	3-17	<p><b>NEW:</b> RRHA has established a policy that the family’s revocation of consent to allow the RRHA to access records from financial institutions will result in denial of admission. A family whose assistance is denied for this reason may request an informal review in accordance with RRHA procedures.</p>	Housing Opportunities through Modernization Act (HOTMA) Update

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<b><u>Chapter 5 Eligibility and Screening</u></b>	No previous language for this chapter	No previous language for this chapter	<b><u>Chapter 3, Part II, Section 3-II.E</u></b>	3-18	<p><b>Existing Tenant Search</b>  Prior to admission to the program, the PHA must search for all household members using the EIV Existing Tenant Search module. The PHA must review the reports for any SSA matches involving another PHA or a multifamily entity and follow up on any issues identified. The PHA must provide the family with a copy of the Existing Tenant Search results if requested. At no time may any family member receive duplicative assistance.</p> <p>If the tenant is a new admission to the PHA, and a match is identified at a multifamily property, the PHA must report the program admission date to the multifamily property and document the notification in the tenant file. The family must provide documentation of move-out from the assisted unit, as applicable.</p> <p><b>RRHA Policy</b>  RRHA will contact the other RRHA or owner identified in the report to confirm that the family has moved out of the unit and obtain documentation of current tenancy status, including a form HUD-50058 or 50059, as applicable, showing an end of participation. The PHA will only approve assistance contingent upon the move-out from the currently occupied assisted unit.</p>	Housing Opportunities through Modernization Act (HOTMA) Update
<b><u>Chapter 5 – Eligibility and Screening</u></b>	No Previous language for this chapter	No Previous language for this chapter	<b><u>Chapter 3 – Eligibility, Part II, Section 3-II.E</u></b>	3-19	<p><b>EIV Income Report</b>  For each new admission, the PHA is required to review income information in EIV to confirm and validate family reported income within 120 days after the move-in information is transmitted to HUD. The PHA must print and maintain copies</p>	Housing Opportunities through Modernization Act (HOTMA) Update

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					of the reports in the tenant file and resolve any discrepancies with the family.	
<b><u>Chapter 5 – Eligibility and Screening</u></b>	34	HOTMA imposes a \$100,000 asset limitation for eligibility and continued assistance. Families are considered ineligible if assets exceed \$100,000 or if they own real property suitable for occupancy.	<b><u>Chapter 3 – Eligibility, Part III, Section 3-III.C</u></b>	3-23	<p>There are two circumstances under which a family is ineligible for the program based on asset ownership.</p> <p>First, assistance may not be provided to any family if the family’s net assets exceed the HUD-published asset limitation amount (adjusted annually by HUD).</p> <ul style="list-style-type: none"> <li>• This amount is listed in HUD’s current year Inflation-Adjusted Values tables</li> <li>• \$100,000 for 2024, \$103,200 for 2025</li> </ul> <p>Second, the family has real property that is suitable for occupancy by the family as a residence and the family has:</p> <ul style="list-style-type: none"> <li>• A present ownership interest in the real property;</li> <li>• A legal right to reside in the real property; and</li> <li>• The effective legal authority to sell (based on state or local laws of the jurisdiction where the property is located) the real property.</li> </ul> <p>The PHA does not have the discretion not to enforce or provide limited enforcement of the asset limitation at admission. However, the real property restriction does not apply in the following circumstances:</p> <ul style="list-style-type: none"> <li>• Any property for which the family is receiving assistance for a manufactured home under 24 CFR 982.620 or under the HCV Homeownership program;</li> <li>• Any property that is jointly owned by a member of the family and at least one non-household member who does</li> </ul>	Housing Opportunities through Modernization Act (HOTMA) Update

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					<p>not live with the family, if the non-household member resides at the jointly owned property;</p> <ul style="list-style-type: none"> <li>• Any family that is offering the property for sale; or</li> <li>• Any person who is a victim of domestic violence, dating violence, sexual assault, or stalking. <ul style="list-style-type: none"> <li>- When a family asks for an exception because a family member is a victim of domestic violence, dating violence, sexual assault, or stalking, the PHA must comply with all the confidentiality requirements under VAWA. The PHA must accept a self-certification from the family member, and the restrictions on requesting documentation under VAWA apply.</li> </ul> </li> </ul> <p>A property is considered <i>suitable for occupancy</i> unless the family demonstrates that it:</p> <ul style="list-style-type: none"> <li>• Does not meet the disability-related needs for all members of the family (e.g., physical accessibility requirements, disability-related need for additional bedrooms, proximity to accessible transportation, etc.);</li> <li>• Is not sufficient for the size of the family;</li> </ul> <p><u>RRHA Policy</u>  RRHA defines <i>not sufficient for the size of the family</i> as being overcrowded based on the PHA’s occupancy standards in Chapter 5.</p> <ul style="list-style-type: none"> <li>• Is geographically located so as to be a hardship for the family (e.g., the distance or commuting time between the property and the family’s place of work or school would be a hardship to the family, as determined by the PHA or owner);</li> </ul> <p><u>RRHA Policy</u></p>	

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					<p>In general, the PHA defines a <i>geographic hardship</i> to include when a family members’ work, school, health care provider, or other necessary service is located an unreasonable distance from the real property or there is a lack of adequate transportation options for the family to access work, school, health care, or other necessary services. The PHA will consider circumstantial details a family faces when determining whether a geographical hardship is present.</p> <ul style="list-style-type: none"> <li>• Is not safe to reside in because of the physical condition of the property (e.g., property’s physical condition poses a risk to the family’s health and safety and the condition of the property cannot be easily remedied); or</li> <li>• Is not a property that a family may reside in under the State or local laws of the jurisdiction where the property is located.</li> </ul> <p>If a family meets one of the above exceptions, the real property is not automatically excluded from the calculation of net family assets. Unless the real property is specifically excluded from net family assets as described in 24 CFR 5.603 and Chapter 6 of this policy, it will be included in net family assets. If the value of that real property brings the net family assets above the HUD-published asset limitation amount, the family is out of compliance with the asset limitation.  See Chapter 7 for information on verifying net family assets for purposes of the asset limitation.</p>	
<b><u>Chapter 6 – Tenant Selection and Assignment Plan</u></b>	76	No previous language defining preferences	<b><u>Chapter 4 – Applications, Waiting List and Tenant Selection, Part III, Section 4-III.B</u></b>	4-15	If the PHA has a Housing Choice Voucher program, the PHA must offer, and if accepted, provide the family a selection preference for an appropriate-sized public housing unit that first becomes available for occupancy after the time period expires for an HCV family whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame, and who are unable to lease a	Consistency with the Administrative Plan for Emergency VAWA transfers and 24 CFR § 982.404(e) for HCV failed inspections

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					<p>new unit within the term of the voucher [24 CFR 982.404(e)(2)].</p> <p>The PHA will use the following local preferences:</p> <p>Emergency VAWA Transfer Preference (1 point): The PHA will offer a preference to a family that includes a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking who are seeking an emergency transfer under VAWA from the PHA’s Housing Choice Voucher program or other covered housing program operated by the PHA.</p> <p>HCV Abatement-Affected Family Preference (2 points): The PHA will provide a preference for an HCV family whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame, and who were unable to lease a new unit within the term of the voucher.</p>	
<p><b><u>Chapter 10 – Income and Adjustment</u></b></p>	<p>113</p>	<p>Dependents that are subject to a joint custody arrangement will be considered a member of an assisted family if the dependent lives with the applicant or resident family 50 percent or more of the time. When more than one applicant or assisted family claims the same individual as a dependent family member, the family with primary custody of the individual at the time of the admission or reexamination will be able to claim the individual as a dependent for purposes of annual income calculation. If there is a dispute about which family has primary custody, RRHA will make the determination based on available</p>	<p><b><u>Chapter 6 Income and Rent Determinations, Part I, Section 6-1.B</u></b></p> <p>*Includes pre and post HOTMA regulations</p>	<p>6-6</p>	<p><b>Joint Custody</b> children who are subject to a joint custody agreement but live with one parent at least <b>51% of the time</b> will be considered members of the household. “51% of the time” is defined as 183 days of the year, which do not have to run consecutively. When more than one applicant or assisted family claims the same individual as a dependent family member, the family with primary custody of the individual at the time of the admission or reexamination will be able to claim the individual as a dependent for purposes of annual income calculation. If there is a dispute about which family has primary custody, RRHA will make the determination based on available documents such as court orders, an IRS return showing which family has claimed the child for income tax purposes, or other evidence which RRHA may accept in its discretion.</p>	<p>Housing Opportunities through Modernization Act (HOTMA) Update</p>

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		documents such as court orders, an IRS return showing which family has claimed the child for income tax purposes, or other evidence which RRHA may accept in its discretion.				
<b><u>Chapter 10 – Income and Adjusted Income</u></b>		No previous language for this chapter	<b><u>Chapter 6 – Income and Rent Determinations, Part I, Section 6-1.F.</u></b>	6-10	<p><b>Independent Contractors</b>  Income received as an independent contractor is included in annual income, even if the source, date, or amount of the income varies [24 CFR 2.609 (b)(24) as updated for HOTMA]. An <i>independent contractor</i> is defined as an individual who qualifies as an independent contractor instead of an employee in accordance with the Internal Revenue Code federal income tax requirements and whose earnings are consequently subject to the self-employment tax. In general, an individual is an independent contractor if the payer has the right to control or direct only the result of the work and not what will be done and how it will be done [24 CFR 5.603(b) as updated for HOTMA]. This may include individuals such as third-party delivery and transportation service providers and “gig workers” like babysitters, landscapers, rideshare drivers, and house cleaners. Income earned as an independent contractor is not considered nonrecurring income.</p> <p><b>Business Expansion</b>  HUD regulations do not permit the PHA to deduct from gross income expenses for business expansion.  <u>RRHA Policy</u>  <i>Business expansion</i> is defined as any capital expenditures made to add new business activities, to expand current facilities, or to operate the business in additional locations. For example, purchase of a street sweeper by a construction business for the purpose of adding street cleaning to the services offered by the business would be considered a business expansion. Similarly, the purchase of a property by a hair care business to open at a second location would be considered a business expansion.</p>	Housing Opportunities through Modernization Act (HOTMA) Update

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					<p><b>Capital Indebtedness</b>  HUD regulations do not permit the PHA to deduct from gross income the amortization of capital indebtedness.  <u>RRHA Policy</u>  <i>Capital indebtedness</i> is defined as the principal portion of the payment on a capital asset such as land, buildings, and machinery. This means the PHA will allow as a business expense interest, but not principal, paid on capital indebtedness.</p> <p><b>Negative Business Income</b>  If the net income from a business is negative, no business income will be included in annual income; a negative amount will not be used to offset other family income.</p> <p><b>Co-owned Businesses</b>  <u>PHA Policy</u>  If a business is co-owned with someone outside the family, the family must document the share of the business it owns. If the family’s share of the income is lower than its share of ownership, the family must document the reasons for the difference.</p>	
<b><u>Chapter 10 – Income and Adjusted Income</u></b>	No previous language for this chapter	No previous language for this chapter	<b><u>Chapter 6A. Income and Rent Determination, Part I, Section 6-I.G.</u></b>	6-12	<b>NEW: Student Financial Assistance</b>	Housing Opportunities through Modernization Act (HOTMA) Update
<b><u>Chapter 10 – Income and Adjusted Income</u></b>	No previous language for this chapter	No Previous language for this chapter	<b><u>Chapter 6A. Income and Rent Determination, Part I, Section 6-I.H.</u></b>	6-18	Annual income includes “all amounts received,” not the amount that a family may be legally entitled to receive but which they do not receive. When the SSA overpays an individual, resulting in a withholding or deduction from their benefit amount until the overpayment is paid in full, the PHA must use the reduced benefit amount after deducting only the amount of the overpayment withholding from the gross benefit amount.	Housing Opportunities through Modernization Act (HOTMA) Update

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<b><u>Chapter 10 – Income and Adjusted Income</u></b>	107	Only mention non-recurring income as an exclusion	<b><u>Chapter 6A. Income and Rent Determination, Part I, Section 6-I.I.</u></b>	6-20	Expanded upon the definition of nonrecurring income and exclusions	Clarification
<b><u>Chapter 10 – Income and Adjusted Income</u></b>	No previous language for this chapter	No previous language for this chapter	<b><u>Chapter 6A. Income and Rent Determination, Part I, Section 6-I.J</u></b>	6-21	<b>NEW: State Payments to Allow Individuals with Disabilities to Live at Home</b>	Housing Opportunities through Modernization Act (HOTMA) Update
<b><u>Chapter 10-Income and Adjusted Income</u></b>		References to settlements for personal injury	<b><u>Chapter 6A. Income and Rent Determination, Part I, Section 6-I.K</u></b>	6-22	<b>NEW: Civil Rights Settlements</b>	Housing Opportunities through Modernization Act (HOTMA) Update
<b><u>Chapter 10-Income and Adjusted Income</u></b>	114	Regular alimony and child support payments are counted as income for calculation of Total Tenant Payment. If the amount of child support or alimony actually received is less than the amount awarded by the court, RRHA will use the amount that is actually received by the family. RRHA will accept as verification that the family is receiving an amount less than the court-ordered award if: 1. RRHA receives verification from the agency responsible for enforcement or collection, or 2. the family furnishes documentation of child support or alimony collection action filed through a child support enforcement/collection agency or has filed an enforcement or collection action through an attorney.	<b><u>Chapter 6A. Income and Rent Determination, Part I, Section 6-I.O</u></b>	6-37	<b>ADD: Additionally, the PHA will count-court awarded amounts for alimony and child support unless:</b>  <ol style="list-style-type: none"> <li>1. The family certifies and PHA verifies that the payments are not being made; or</li> <li>2. No payments have been made in the past three months and there are no lump sums.</li> </ol>	
<b><u>Chapter 10-Income and Adjusted Income</u></b>	No previous language	No previous language for this chapter	<b><u>Chapter 6B. Income and Rent</u></b>	6-3	<u>However, when a family member’s wages or benefits are garnished, levied, or withheld to pay restitution, child support, tax debt, student loan debt, or other applicable debts, the PHA</u>	Housing Opportunities through Modernization Act (HOTMA) Update

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	for this chapter		<b><u>Determination, Part I, Section 6-IA.</u></b>		<u>must use the gross amount of the income, prior to the reduction, to determine a family’s annual income</u>	
<b><u>Chapter 10-Income and Adjusted Income</u></b>	105-106	Definition of Annual Income inclusions and exclusions	<b><u>Chapter 6B. Income and Rent Determination, Part I, Section 6-IA.</u></b>	6-20	<u>Income that will not be repeated beyond the coming year (i.e., the 12 months following the effective date of the certification), based on information provided by the family, is considered nonrecurring income and is excluded from annual income. For example, a family receives income from a guaranteed income program in their city that has a discrete beginning and end date. While the guaranteed income will be repeated in the coming year, it will end before the family’s next annual reexamination. This income is fully excluded from annual income. Any workers’ compensation is always excluded from annual income, regardless of the frequency or length of the payments.</u>	Housing Opportunities through Modernization Act (HOTMA) Update
<b><u>Chapter 10-Income and Adjusted Income</u></b>	106	Definition of Annual income exclusions	<b><u>Chapter 6B. Income and Rent Determination, Part I, Section 6-IM.</u></b>	6-27	<b>ADD: Additional Annual Income Exclusions</b>	Housing Opportunities through Modernization Act (HOTMA) Update
<b><u>Chapter 10-Income and Adjusted Income</u></b>	115	RRHA must count as annual income the value of any family assets disposed of for less than fair market value during the two years preceding the date of a family’s initial determination of income upon program admission, and within one year preceding the date of any annual re-examination. RRHA will count as income the difference between the market value and the actual payment received for less than market value in calculating total assets. Assets disposed of as a result of foreclosure or bankruptcy are not considered to be assets disposed of for less than fair market value. Assets disposed of as a	<b><u>Chapter 6B. Income and Rent Determination, Part II, Section 6-IB.</u></b>	6-35	<b>ADD: <u>The family must certify whether any assets have been disposed of for less than fair market value in the preceding two years.</u></b>	Housing Opportunities through Modernization Act (HOTMA) Update

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		result of a divorce or separation is not considered to be assets disposed of for less than fair market value if RRHA can determine from applicable documentation that the family received equal consideration not measurable in dollar terms (e.g., settlement of claims). RRHA’s minimum threshold for counting assets disposed of for less than Fair Market value is \$50,000. If the total value of assets disposed of within the twoyear period is less than \$50,000, they will not be considered an asset.				
<b><u>Chapter 10-Income and Adjusted Income</u></b>	105	Annual Income includes... 3. Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation is permitted only as provided in IRS regulations and applicable law. Any withdrawal of cash or assets from an investment in real or personal property will be included in annual income, except to the extent the withdrawal is reimbursement to the family for cash or assets invested by the family. 4.If the family has net family assets (within the meaning of 24 C.F.R. § 5.603(b)) in excess of \$50,000, the family’s annual income shall include the greater of (i) the actual income derived from all Net Family Assets, or (ii) a percentage of the value of such Assets based on the current	<b><u>Chapter 6B. Income and Rent Determination, Part II, Section 6-IIC.</u></b>	6-37	<b><u>Necessary and Non-Necessary Personal Property [24 CFR 5.603(b)(3)(i)]</u></b> <b><u>All assets are categorized as either <i>real property</i> (e.g., land, a home) or <i>personal property</i>.</u></b> <b><u>Personal property includes tangible items, like boats, as well as intangible items, like bank accounts.</u></b> <b><u>The value of necessary items of personal property is excluded from the calculation of net family assets. Necessary items of personal property include a car used for commuting or medical devices.</u></b> <b><u>HUD defines <i>necessary personal property</i> as items essential to the family for the maintenance, use, and occupancy of the premises as a home; or they are necessary for employment, education, or health and wellness. Necessary personal property includes more than merely items that are indispensable to the bare existence of the family. It may include personal effects (such as items that are ordinarily worn or utilized by the individual), items that are convenient or useful to a reasonable existence, and items that support and facilitate daily life within the family’s home. Necessary personal property also includes items that assist a household member with a disability, including any items related to disability-related needs, or that</u></b>	Housing Opportunities through Modernization Act (HOTMA) Update

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		passbook savings rate, as determined by HUD			<p><u>may be required for a reasonable accommodation for a person with a disability. Necessary personal property does not include bank accounts, other financial investments, or luxury items. Items of personal property that do not qualify as necessary personal property are classified as non-necessary personal property.</u></p> <p><u>The combined value of all <b>non-necessary</b> items of personal property is only included in annual income when the combined total value exceeds the HUD-published threshold amount (adjusted annually and published in HUD’s current year Inflation-Adjusted Values tables). When the combined value of all non-necessary personal property does not exceed the HUD-published threshold amount, all non-necessary personal property is excluded from net family assets.</u></p> <ul style="list-style-type: none"> <li><u>The threshold amount is \$50,000 for 2024, and \$51,600 for 2025.</u></li> </ul> <p><u>While not an exhaustive list, the following table from Notice PIH 2023-27 provides examples of necessary and non-necessary personal property.</u></p> <p><b><u>**includes table of necessary and non-necessary personal property**</u></b></p> <p><u>In determining the value of non-necessary, non-financial personal property, the PHA will use the family’s estimate of the value. The PHA may obtain an appraisal if there is reason to believe that the family’s estimated value is off by \$50 or more. The family must cooperate with the appraiser but cannot be charged any costs related to the appraisal.</u></p>	
<b><u>Chapter 10-Income and Adjusted Income</u></b>	No previous language	No previous language for this chapter	<b><u>Chapter 6B. Income and Rent</u></b>	6-39	<ul style="list-style-type: none"> <li><u>When the combined value of net family assets is greater than the HUD-published threshold amount, which is</u></li> </ul>	Housing Opportunities through Modernization Act (HOTMA) Update

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	for this chapter		<b><u>Determination, Part II, Section 6-IIC.</u></b>		adjusted annually and listed in HUD’s current year Inflation Adjusted Values tables (\$50,000 for 2024, and \$51,600 for 2025), checking and/or savings accounts would be counted toward net family assets. When the combined value of all non-necessary personal property does not exceed the HUD-published threshold amount, all non-necessary personal property is excluded from net family assets. In this case, the value of the family’s checking and/or savings accounts would not be considered when calculating net family assets.	
<b><u>Chapter 9 – Rent</u></b>	95	At each reexamination, all Public Housing residents are offered the choice of paying the Flat Rent or Income-based Rent.	<b><u>Chapter 6B – Income and Rent Determination, Part III, Section 6-III.E</u></b>	6-59	<b>ADD:</b> The PHA will require families to submit their choice of flat or income-based rent in writing or via rent café portal and will maintain such requests in the tenant file as part of the admission or annual reexamination process.	Rent Choice
<b><u>Chapter 11- Verifications Procedure</u></b>	n/a	none	<b><u>Chapter 7.A - Verification</u></b>	7-3	<b>RRHA Policy</b> The RRHA has established a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance in accordance with PHA policy. In order for a family to revoke their consent, the family must provide written notice to the RRHA. Within 10 business days of the date the family provides written notice, the RRHA will send the family a notice acknowledging receipt of the request and explaining that revocation of consent will result in denial or termination of assistance, as applicable. At the same time, the RRHA will notify the local HUD office.	HOTMA Update
<b><u>Chapter 11 - Verifications</u></b>	No previous language for this chapter	No previous language for this chapter	<b><u>Ch. 7.A. Verifications, Part I, Section 7-I.B</u></b>	7-5	<b>NEW:</b> When available and applicable, the PHA will accept other programs’ Safe Harbor determinations of income at annual reexamination to determine the family’s total annual income. The PHA will still require third-party verification of all deductions such as the health and medical care expense or childcare expense deductions. Further, if the family is eligible for and claims the disability assistance expense or childcare expense deduction-ns, where applicable, the PHA will obtain third-party verification of the amount of employment income	As a Housing Opportunities through Modernization Act (HOTMA) recommendation to streamline verification process

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					<p>of the individual(s) enabled to work in order to cap the respective expenses as required.</p> <p>Prior to using any Safe Harbor determination from another program, the PHA will ask the family if they agree with the income amounts listed. If the family disputes the income amounts on the Safe Harbor determination, the PHA will obtain third-party verification of all sources of income and assets (as applicable).</p> <p>The PHA will not accept other programs’ determinations of income for any new admission or interim reexamination.</p>	
<b><u>Chapter 11 Verification Procedures</u></b>	n/a	none	<b><u>Chapter 7.A - Verification</u></b>	7-9	RRHA may elect to use the Safe Harbor income determinations if/when the verification hierarchy has been exhausted.	To ensure timely processing of ReExaminations
<b><u>Chapter 11 Verification Procedures</u></b>	126	Enterprise Income Verification (EIV) Work Number	<b><u>Chapter 7.A - Verification</u></b>	7-11	Added YARDI Income Verification System	Cost Savings
<b><u>Chapter 11- Verification Procedures</u></b>	n/a	none	<b><u>Chapter 7.B - Verification</u></b>	7-2	Family members turning 18 years of age between annual recertifications will be notified in writing that they are required to sign the required Consent to the Release of Information Form HUD-9886-A at the family’s next annual or interim reexamination, whichever is earlier within 10 business days of turning 18 years of age.	To receive timely consent of all adult household members
<b><u>Chapter 11- Verification Procedures</u></b>	n/a	none	<b><u>Chapter 7.B - Verification</u></b>	7-8, &.I.C	<p>STREAMLINED INCOME DETERMINATIONS [24 CFR 960.257(c); Notice PIH 2023-27]</p> <p>HUD permits PHAs to streamline the income determination process for family members with fixed sources of income. While third-party verification of all income sources must be obtained during the intake process and every three years thereafter, in the intervening years, the PHA may determine</p>	Saves time on processing reexaminations

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					<p>income from fixed sources by applying a verified cost of living adjustment (COLA) or other inflationary adjustment factor. Streamlining policies are optional. The PHA may, however, obtain third-party verification of all income, regardless of the source. Further, upon request of the family, the PHA must perform third-party verification of all income sources.</p> <p>Fixed sources of income include Social Security and SSI benefits, pensions, annuities, disability or death benefits, and other sources of income subject to a COLA or rate of interest. The determination of fixed income may be streamlined even if the family also receives income from other non-fixed sources.</p> <p>Two streamlining options are available, depending upon the percentage of the family’s income that is received from fixed sources.</p> <p>When 90 percent or more of a family’s unadjusted income is from fixed sources, the PHA may apply the inflationary adjustment factor to the family’s fixed-income sources, provided that the family certifies both that 90 percent or more of their unadjusted income is fixed and that their sources of fixed income have not changed from the previous year. Sources of non-fixed income are not required to be adjusted and must not be adjusted by a COLA, but PHAs may choose to adjust sources of non-fixed income based on third-party verification. PHAs have the discretion to either adjust the non-fixed income or carry over the calculation of non-fixed income from the first year to years two and three.</p>	
<b><u>Chapter 11-Verification Procedures</u></b>	n/a	none	<b><u>Chapter 7.B-Verification</u></b>	7-9	<p><del>Regardless of the percent of a family’s unadjusted income from fixed income sources:</del><del>If 90 percent or more of a family’s unadjusted income is from fixed income sources:</del></p> <p><u>The PHA will streamline the annual reexamination process by applying the verified COLA/inflationary adjustment factor to fixed-income sources.</u></p>	Saves time on processing reexaminations

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					<p><u>The family will be required to sign a self-certification stating that their sources of fixed income have not changed from the previous year.</u></p> <p><u>The PHA will document in the file how the determination that a source of income was fixed was made.</u></p> <p><u>If the family’s sources of fixed income have changed from the previous year, the PHA will obtain third-party verification of any new sources of fixed income.</u></p>	
<b><u>Chapter 11 – Verification Procedures</u></b>	126	EIV Work Number	<b><u>Chapter 7.B - Verification</u></b>	7-15	<b>Adding: YARDI Verification System</b>	Cost Savings
<b><u>Chapter 11- Verification Procedures</u></b>	n/a	none	<b><u>Chapter 7.B - Verification</u></b>	7-17	<p><b>RRHA will use an average of the last two quarters of income listed in EIV to determine income from employment.</b></p> <p><b>RRHA will provide the family with the information in EIV. <u>The family will be required to sign a self-certification stating that the amount listed in EIV is accurate and representative of current income. If the family disagrees with using only the last two quarters of income listed in EIV, because of the seasonal or otherwise fluctuating nature of a particular family member’s employment, RRHA will permit the family to sign a self-certification stating that the average of all four quarters of income listed in EIV is accurate and representative of current annual income and use that amount for calculating annual income. If the family disagrees and contends that the amount listed in EIV is not reflective of current income, or if less than two quarters are available in EIV, the RRHA will use written third-party verification from the sources as outlined above (Upfront Income Verification Using Non-HUD Systems)</u></b></p>	
<b><u>Chapter 11- Verification Procedures</u></b>	n/a	none	<b><u>Chapter 7.B - Verification</u></b>	7-18	<b><u>The PHA may use the verification obtained during an interim reexamination for an annual reexamination if there have been</u></b>	HOTMA requirement

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					<a href="#">no other changes to annual income since the interim reexamination.</a>	
<b><u>Chapter 8 – Leasing</u></b>	83	At the time of leasing, the new resident will receive a copy of the executed RRHA Dwelling Lease, Pet Policy, Mold Addendum, Satellite Addendum, Bed Bug Addendum, Smoke-Free Addendum, Notice of Rights under VAWA, Rules and Regulations, and any other amendment or endorsement to such lease required by applicable law or RRHA policy at such time.	<b><u>Chapter 8 – Leasing and Inspections, Part I, Section I-B.</u></b>	8-3	<p><b><u>RRHA Policy</u></b>  <b>After unit acceptance but prior to occupancy, a PHA representative will conduct a lease Reading with the family. The head of household or spouse is required to attend.</b></p> <p><b><u>Lease Reading Agenda</u></b>  <b><u>RRHA Policy</u></b>  <b>When families attend the lease reading, they will be provided with:</b></p> <ul style="list-style-type: none"> <li>A copy of the lease</li> <li>A copy of the PHA’s grievance procedure</li> <li>A copy of the rules and regulations</li> <li>A copy of the PHA’s Standard list of charges</li> <li>A copy of “Is Fraud Worth It?” (form HUD-1141-OIG), which explains the types of actions a family must avoid and the penalties for program abuse</li> <li>A copy of “What You Should Know about EIV,” a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2017-12</li> <li>Reasonable Accommodations Policy</li> <li>A copy of the form HUD-5380, VAWA Notice of Occupancy Rights</li> <li>A copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking</li> <li>A copy of the PHA’s smoke free policy</li> <li>The HUD pamphlet on lead-based paint entitled, “Protect Your Family from Lead in Your Home.”</li> <li>Signed Lead Disclosure Form</li> <li>Virginia Statement of Rights and Responsibilities under the Virginia Residential Landlord and Tenant Act (VRLTA)</li> <li>A copy of the Move -In Inspection</li> </ul> <p><b>Topics to be discussed and explained to all families include:</b>  <b>Applicable deposits and all other charges</b></p>	Expanding the documents required to be provided to new tenants for lease compliance

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					<p>Review and explanation of lease provisions            Unit maintenance requests and work orders            The PHA’s interim reporting requirements            Review and explanation of occupancy forms            Community service requirements            Family choice of rent            Reasonable Accommodation Requests            VAWA protections            Smoke-free policies            Hardship Exemptions            Renter Insurance</p>	
<b><u>Chapter 8 – Leasing</u></b>	84	No previous language for this chapter	<b><u>Chapter 8 – Leasing and Inspections</u></b>	8-6	<p><b>NEW:</b> Schedules of special (or standard) charges and rules and regulations are subject to modification or revision. Because these schedules are incorporated into the lease by reference, residents and resident organizations must be provided at least 30 days written notice of the reason(s) for any proposed modifications or revisions, and must be given an opportunity to present written comments. The notice must be delivered directly or mailed to each tenant; or posted in at least three conspicuous places within each structure or building in which the affected dwelling units are located, as well as in a conspicuous place at the Property Management office, if any, or if none, a similar central business location within the Property/Community. Comments must be taken into consideration before any proposed modifications or revisions become effective [24 CFR 966.5].</p> <p><u>RRHA Policy</u></p> <p>When the PHA proposes to modify or revise schedules of special charges or rules and regulations, the PHA will post a copy of the notice in the three conspicuous locations within the Property Management office or will mail or directly deliver a copy of the notice to each resident family. RRHA</p>	

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					may email a copy of the notice to each tenant or post the notice to each tenant’s portal in Rent Café.	
<b><u>Chapter 13 – Inspection, Repair, and Maintenance of Dwelling Units</u></b>	158	RRHA will notify residents of unit inspections in the following manner: 1. 48-hour notice.	<b><u>Chapter 8 – Leasing and Inspections, Part II, Section 8-II.B.</u></b>	8-18	A written statement specifying the purpose of the PHA entry delivered to the dwelling unit at least <b>72 hours</b> before such entry is considered reasonable advance notification.  RRHA shall provide a written notice to the family occupying the unit which describes the date, time, and general nature of such inspection. Such notice will be hand-delivered to any family member or posted on the front door of the subject unit not less than <b>48 72 hours</b> prior to the time the inspection is conducted or shall otherwise be delivered in any other manner permitted by applicable law.  For regular PHA annual self-inspections, the family will receive at least <b>72 hours</b> written notice of the inspection to allow the family to prepare the unit for the inspection.	To comply with state law.
<b><u>Chapter 13 – Inspection, Repair, and Maintenance of Dwelling Units</u></b>	160	Non-emergency defects. To repair any non-emergency defect or to conduct non-emergency maintenance in a dwelling unit, RRHA shall provide a written notice to the family occupying the unit which describes the date, time, and general reason for the entry and the repairs or maintenance to be conducted. Such notice will be hand-delivered to any family member or posted on the front door of the subject unit not less than <b>24 hours</b> prior to the time entry is made or shall otherwise be delivered in any other manner permitted by applicable law.	<b><u>Chapter 8 – Leasing and Inspections, Part II, Section 8-II.B.</u></b>	8-23	The PHA will correct deficiencies resulting in a non-emergency work order identified during a PHA conducted inspection in <b>accordance with the workorder system level of priority – urgent, routine, and planned maintenance schedule.</b>  To repair any non-emergency defect or to conduct non-emergency maintenance in a dwelling unit, RRHA shall provide a written notice to the family occupying the unit which describes the date, time, and general reason for the entry and the repairs or maintenance to be conducted. Such notice will be hand-delivered to any family member or posted on the front door of the subject unit not less than <b>24-72 hours</b> prior to the time entry is made or shall otherwise be delivered in any other manner permitted by applicable law.	Clarification to the work order system  To comply with state law regarding notices to residents for non-emergency inspection and/or maintenance
<b><u>Chapter 12- Reexaminations</u></b>	No previous language	No previous language for this chapter	<b><u>Chapter 9- Reexaminations, Part I, Section 9-I.B.</u></b>	9-4	<b>HUD permits PHAs to streamline the income determination process for family members with fixed sources of income.</b>	To streamline processes for staff

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	for this chapter				<p>While third-party verification of all income sources must be obtained during the intake process and every three years thereafter, in the intervening years the PHA may determine income from fixed sources by applying a verified cost of living adjustment (COLA) or rate of interest. The PHA may, however, obtain third-party verification of all income, regardless of the source. Further, upon request of the family, the PHA must perform third-party verification of all income sources.</p> <p>Fixed sources of income include Social Security and SSI benefits, pensions, annuities, disability or death benefits, and other sources of income subject to a COLA or rate of interest. The determination of fixed income may be streamlined even if the family also receives income from other non-fixed sources.</p> <p>Two streamlining options are available, depending upon the percentage of the family’s income that is received from fixed sources. If at least 90 percent of the family’s income is from fixed sources, the PHA may streamline the verification of fixed income but is not required to verify non-fixed income amounts. If the family receives less than 90 percent of its income from fixed sources, the PHA may streamline the verification of fixed income and must verify non-fixed income annually.</p> <p><u>RRHA Policy</u></p> <p>RRHA may streamline the annual reexamination process by applying the verified COLA or interest rate to fixed-income sources. RRHA will document in the file how the determination that a source of income was fixed was made.</p> <p>If a family member with a fixed source of income is added, RRHA will use third-party verification of all income amounts for that family member.</p> <p>If verification of the COLA or rate of interest is not available, RRHA will obtain third-party verification of income amounts.</p>	

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					<p>Third-party verification of fixed sources of income will be obtained during the intake process and at least once every three years thereafter.</p> <p>Third-party verification of non-fixed income will be obtained annually regardless of the percentage of family income received from fixed sources.</p>	
<b><u>Chapter 12- Reexaminations</u></b>	155	Rent increases (except those due to misrepresentation) require 30 days’ notice and generally will be effective on the first of the month following the 30-day notice to the family.	<b><u>Chapter 9- Reexaminations, Part I, Section 9-I.E</u></b>	9-10	In general, an <i>increase</i> in the tenant rent that results from an annual reexamination will take effect on the family’s anniversary date, and the family will be notified at least <del>30</del> <b>60</b> days in advance.	To be in compliance with state law
<b><u>Chapter 12 – Reexaminations</u></b>	149	Families must submit a written request to RRHA for approval to add a new family member, live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the apartment for more than 30 days in any given 12-month period, and therefore no longer qualifies as a “guest.” Requests must be made in writing and approved by RRHA prior to the individual moving into the apartment.	<b><u>Chapter 9 – Reexaminations, Part III, Section 9-III.B</u></b>	9-17	Families must request PHA approval to add a new family member, live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than <b>7 consecutive days</b> or for more than 30 days in any 12-month period and therefore no longer qualifies as a “guest.” Requests must be made in <b>writing online through the Resident Rent Café Portal</b> and approved by the PHA prior to the individual moving into the unit.	To be consistent with RRHA Dwelling Lease
<b><u>Chapter 18- Community Service</u></b>	237	At least 30 days before each annual re-examination, RRHA will review the exempt or nonexempt status of each family member, and compliance of non-exempt family members.	<b><u>Chapter 11 Community Service Section II-I.C. Determination of Exemption Status (Annual)</u></b>	11-8	At least <b>60 days</b> prior to annual re-examination, the RRHA will review and verify the exemption status of all adult family members.	To build in additional lead time for review and verification to ensure timely completion and notification of residents.

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<b><u>Chapter 15- Transfers</u></b>	185	The existence of a major defect or maintenance problem at the family’s previous unit that constitutes a serious danger to the health and safety of a family member that cannot be repaired in a reasonable period of time or while the apartment is occupied	<b><u>Chapter 12- Transfers</u></b>	12-3	<b>Maintenance conditions in the resident’s unit, building or at the site that pose an immediate, verifiable threat to the life, health, or safety of the resident or family members that cannot be repaired or abated within 24 hours. Examples of such unit or building conditions would include: a gas leak, no heat in the building during the winter, no water, toxic contamination, and serious water leaks.</b>	To clarify maintenance conditions that are grounds for emergency transfers
<b><u>Chapter 15 – Transfers Section K</u></b>	188	On an annual basis, RRHA will review its current occupancy goals and objectives and based on that review, establish a ratio of new admissions to transfers. The established ratio of new admissions <b>to transfers will be five (5) to one (1), meaning for every five (5) new admissions there will be one (1) transfer.</b> This ratio does not apply to mandatory or emergency transfers.	<b><u>Chapter 12 Transfers, Part III, Section 12- III.F.</u></b>	12-17	On an annual basis, RRHA will review its current occupancy goals and objectives and based on that review, establish a ratio of new admissions to transfers. The established ratio of new admissions to transfers will be <b>ten (10) to one (1), meaning for every ten (10) new admissions there will be one (1) transfer.</b> This ratio does not apply to mandatory or emergency transfers.	To minimize subsidy and vacancy loss to the agency.
<b><u>Chapter 15-Transfers</u></b>	n/a	none	<b><u>Chapter 12 -Transfers</u></b>	12-18	<b>With the approval of the executive director, the PHA may, on a case-by-case basis, transfer a family without regard to its placement on the transfer list in order to address the immediate need of a family in crisis.</b>	To provide discretionary authority for CEO in the event of a crisis there to initiate a transfer outside of the transfer waiting list order
<b><u>Chapter 21 – Lease Termination</u></b>	<b><u>No previous language for this chapter</u></b>	No previous language for this chapter	<b><u>Chapter 13 – Lease Termination, Part II, Section 13-II.B</u></b>	13-4	<b>The PHA must terminate the lease if any family member fails to sign and submit any consent form s/he is required to sign for any reexamination.  However, this does not apply if the applicant, participant, or any member of their family, revokes their consent with respect to the ability of the PHA to access financial records from financial institutions, unless the PHA establishes a policy that revocation of consent to access financial records will result in</b>	Housing Opportunities through Modernization Act (HOTMA) Update

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					<p>denial of admission or termination of assistance [24 CFR 5.232(c)]. PHAs may not process interim or annual reexaminations of income without the family’s executed consent forms.</p> <p><u>RRHA Policy</u></p> <p>The PHA has established a policy that revocation of consent to access financial records will result in termination of assistance in accordance with PHA policy.</p> <p>See Chapter 7 for a complete discussion of consent requirements.</p>	
<u>Chapter 21 – Lease Termination</u>	<u>No previous language for this chapter</u>	No previous language for this chapter	<u>Chapter 13 – Lease Termination, Part II, Section 13 – II. C.</u>	13-4	<p>The PHA must terminate the lease if (1) a family fails to submit required documentation within the required timeframe concerning any family member’s citizenship or immigration status; (2) a family submits evidence of citizenship and eligible immigration status in a timely manner, but United States Citizenship and Immigration Services (USCIS) primary and secondary verification does not verify eligible immigration status of the family, resulting in no eligible family members; or (3) a family member, as determined by the PHA, has knowingly permitted another individual who is not eligible for assistance to reside (on a permanent basis) in the unit. For (3), such termination must be for a period of at least 24 months. This does not apply to ineligible noncitizens already in the household where the family’s assistance has been prorated. See Chapter 7 for a complete discussion of documentation requirements.</p>	
<u>Chapter 21 – Lease Termination</u>	No previous language for this chapter	No previous language for this chapter	<u>Chapter 13 – Lease Termination, Part II, Section 13-II.B</u>	13-6	<p><b>The PHA must terminate the lease if any family member fails to sign and submit any consent form s/he is required to sign for any reexamination. However, this does not apply if the applicant, participant, or any member of their family, revokes their consent with respect to the ability of the PHA to access financial records</b></p>	HOTMA Update

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					<p><b>from financial institutions, unless the PHA establishes a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance [24 CFR 5.232(c)]. PHAs may not process interim or annual reexaminations of income without the family’s executed consent forms.</b></p> <p><b><u>RRHA Policy</u></b>  <b>RRHA has established a policy that revocation of consent to access financial records will result in termination of assistance in accordance with PHA policy.</b>  <b>See Chapter 7 for a complete discussion of consent requirements.</b></p>	
<p><b><u>Chapter 21 – Lease Termination</u></b></p>	<p>No previous language for this chapter</p>	<p>No previous language for this chapter</p>	<p><b><u>Chapter 13 – Lease Termination, Part III, Section 13-III.C</u></b></p>	<p>13-27</p>	<p><b><u>NEW: Asset Limitation [24 CFR 5.618; Notice PIH 2023-27]</u></b>  <b>The PHA has discretion with respect to the application of the asset limitation at annual and interim reexamination. The PHA may adopt a written policy of total nonenforcement, enforcement, or limited enforcement as well as adopting exception policies.</b></p> <p><b><u>RRHA Policy</u></b>  <b>RRHA has adopted a policy of total nonenforcement of the asset limitation for all program participants. The asset limitation only applies to initial eligibility determinations for new admissions to the PHA’s public housing program.</b></p>	<p>Housing Opportunities through Modernization Act (HOTMA) Update</p>
<p><b><u>Chapter 12- Reexaminations</u></b></p>	<p><b><u>152</u></b></p>	<p>No previous language for this chapter</p>	<p><b><u>Chapter 13 – Lease Termination, Part II, Section 13-II.J.</u></b></p>	<p>13-8</p>	<p>The PHA must publish over-income limits in their ACOP and update them no later than 60 days after HUD publishes new income limits each year. The over-income limit is calculated by multiplying the very low-income limit (VLI) by 2.4, as adjusted for family size. When determining whether a family is over-income, the PHA must use the applicable income limit for the current number of family members, not including any household members. Further, the over-income limit is based on the family’s annual income, rather than their adjusted income.</p> <p><b><u>NEW: Inclusion of Over-Income Limits Chart</u></b></p>	<p>Housing Opportunities through Modernization Act (HOTMA) Update</p>

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<b><u>Chapter 12- Reexaminations</u></b>	<b><u>153</u></b>	No previous language for this chapter	<b><u>Chapter 13 – Lease Termination, Part II, Section 13-II.J.</u></b>	13-9	If, as a result, the previously over-income family is now below the over-income limit, the family is no longer subject to over-income provisions as of the effective date of the recertification. The PHA will notify the family in writing within 30 days of the determination that over-income policies no longer apply to them.	Necessary to have notice requirement to resident when they are no longer under the over-income policy requirements.
<b><u>Chapter 21-Lease Termination</u></b>	<b><u>256</u></b>	No previous language for this chapter	<b><u>Chapter 13 – Lease Termination, Part III, Section 13-III.C</u></b>	13-23	Defines and details “other good cause” reasons for lease termination	clarification
<b><u>Chapter 21 – Lease Termination</u></b>	<b><u>257</u></b>	No previous language for this chapter	<b><u>Chapter 13 – Lease Termination, Part IV, Section 13-IV.D.</u></b>	13-37	All notices of lease termination due to a tenant’s failure to pay rent must also include:  Instructions on how the tenant can cure the nonpayment of rent violation, including:  An itemized amount separated by month of alleged rent owed by the tenant;  Any other arrearages allowed by HUD and included in the lease separated by month; and  The date by which the tenant must pay the amount of rent owed before an eviction for nonpayment of rent can be filed;  Information on how the tenant may recertify their income, request a minimum rent hardship exemption, or a request to switch from flat rent to income-based rent; and  In the event of a Presidential declaration of a national emergency, information as required by HUD.	Updated to be in compliance with 24 CFR 966.4(1)(3)(ii)
<b><u>Chapter 21 – Lease Termination</u></b>		If rent or any other charge due and owing under the Lease is not paid in full by the eighth day of the month (or, for charges other than rent, such other time as the	<b><u>Chapter 13 – Lease Termination, Part IV, Section 13-IV.D.</u></b>	13-37	The PHA must give written notice of lease termination of:  At least 30 calendar days in the case of failure to pay rent	Updated to be in compliance with 24 CFR 966.4(1)(3)(i)(A)

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		Lease may provide for such charge), a Late Payment Notice and a Notice of Termination will be sent to the resident, informing the resident that the Dwelling Lease will be terminated if payment is not made with- <b>in 14 days</b> . After the expiration of the 14-day period, an Unlawful Detainer will be filed against the resident in the appropriate court.				
<b><u>Chapter 20 – Program Integrity</u></b>	No previous language for this chapter	No previous language for this chapter	<b><u>Chapter 15 – Program Integrity</u></b>	15-II.C	<p><b>New:</b> The responsibilities and expectations of PHA staff with respect to normal program administration are discussed throughout the ACOP. This section specifically addresses actions of a PHA staff member that are considered errors or program abuse related to the public housing program. Additional standards of conduct may be provided in the PHA personnel policy.</p> <p>PHA-caused incorrect rental determinations include (1) failing to correctly apply public housing rules regarding family composition, income, assets, and expenses, and (2) errors in calculation.</p> <p>The following policy is effective upon the PHA’s HOTMA 102/104 compliance date:</p> <p>De Minimis Errors [24 CFR 5.609(c)(4); Notice PIH 2023-27]</p> <p>The PHA will not be considered out of compliance when making annual income determinations solely due to de minimis errors in calculating family income. A de minimis error is an error where the PHA determination of family income deviates from the correct income determination by no more than \$30 per</p>	Housing Opportunities through Modernization Act (HOTMA) Update

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					<p>month in monthly adjusted income (\$360 in annual adjusted income) per family.</p> <p>PHAs must take corrective action to credit or repay a family if the family was overcharged rent, including when PHAs make de minimis errors in the income determination. Families will not be required to repay the PHA in instances where the PHA miscalculated income resulting in a family being undercharged for rent. PHAs state in their policies how they will repay or credit a family the amount they were overcharged as a result of the PHA’s de minimis error in income determination.</p> <p><u>RRHA Policy</u></p> <p>The PHA will reimburse a family for any family overpayment of rent, regardless of whether the overpayment was the result of staff-caused error, staff program abuse, or a de minimis error.</p>	
<u>No Glossary in Previous ACOP</u>	<u>No Glossary in Previous ACOP</u>	<u>No Glossary in Previous ACOP</u>	<u>Glossary</u>		<p><b>In addition to adding a Glossary to the ACOP, the following definitions are applicable upon the PHA’s implementation of HOTMA 102/104:</b></p> <ul style="list-style-type: none"> <li>• Annual income (revised)</li> <li>• Day laborer (new)</li> <li>• De minimis error (new)</li> <li>• Earned income (revised)</li> <li>• Family (revised)</li> <li>• Foster adult</li> <li>• Foster child</li> <li>• Independent contractor</li> <li>• Inflationary index</li> </ul>	Housing Opportunities through Modernization Act (HOTMA) Update

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					<ul style="list-style-type: none"> <li>• Net family assets (revised)</li> <li>• Real property</li> <li>• Seasonal worker</li> <li>• Unearned income</li> </ul>	

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