	HUD Changes 1/1/2027	PHA Changes 1/1/2027
Chapter 1: Overview of the Program and Plan:		
1-II.A. OVERVIEW AND HISTORY OF THE PROGRAM	**HUD added language related to HOTMA changes below:** Rule implementing streamlining changes to the HCV and PBV programs (known as the HOTMA Voucher Final Rule) was published on May 7, 2024, and codified certain provisions in Sections 101, 105, 106, and 112 of HOTMA as well as incorporating changes from the NSPIRE final rule. Technical amendments to the rule were published December 8, 2025. On May 14, 2026, HUD published Notice PIH 2026-15. The notice announced that, as of January 1, 2027, compliance with sections 102 and 104 of the HOTMA is mandatory for all PHAs, except PHAs who participate in the Moving to Work (MTW) demonstration and PHAs who exclusively use the HUD Family Reporting Software (FRS). For PHAs subject to this compliance deadline, all Form HUD-50058 transactions with an effective date of January 1, 2027, and later must be HOTMA-compliant. Language change from "providing decent, safe, and sanitary housing" to "providing safe, habitable housing."	
1.I.D THE PHA'S PROGRAMS		PHA added the Bring It Home to the State Funded Programs.
1.I.E. THE PHA'S COMMITMENT TO ETHICS AND SERVICE PAGE 31		
Chapter 2: Fair Housing and Equal Opportunity		
2-I.B. NONDISCRIMINATION	**HUD Changes:** HUD enforcement of the *Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity Final Rule* has been halted. HUD rescinded Notice PIH 2014-20 regarding Equal Access Rule enforcement and has removed references to the rule from the *HCV Guidebook*. On April 28, 2026, HUD published a proposed rule that seeks to eliminate references to "gender" and "gender identity" with "sex" as defined by Executive Order 14168. This rule has not yet been finalized or codified. Protections for gender and gender identity vary significantly by state.	***PHA Policy remains unchanged:*** *The PHA will not discriminate on the basis of marital status, gender identity, or sexual orientation as currently required under 24 CFR 5.105(a)(2).*

	HUD Changes 1/1/2027	PHA Changes 1/1/2027
2-II.G. PHYSICAL ACCESSIBILITY	**HUD added requirements related to the briefing packet:** As part of the briefing packet, the PHA will include notice to families that if the family includes a person with disabilities, the PHA will provide a current list of available accessible units known to the PHA and will assist the family in locating an available accessible unit, and if necessary, other assistance in locating an available accessible dwelling unit [24 CFR 982.301(b)(12)]	
2-III.A. OVERVIEW	**HUD altered language related to access services and enforcement of discrimination related to persons with limited English Proficiency.** An Executive Order in March of 2025 declared English as the official language of the U.S. and a Memo from the Office of the Attorney General rescinded prior guidance to federal agencies, now stating that language is no longer being considered a protected characteristic connected to natural origin under the Civil Rights Act. HUD FHEO has stated they will prioritize enforcement actions involving intentional discrimination where language has been used as a proxy for national origin or a vehicle for intentional discrimination [FHEO Memo 9/19/25].	***PHA Policy remains unchanged:*** The Scott County CDA will take affirmative steps to communicate with people who need services or information in a language other than English. These persons will be referred to as Persons with Limited English Proficiency (LEP).
	The memo from the OAG also states that agencies are NOT required to amend, remove, or otherwise stop production of all multilingual documents, products, or other services provided or offered. The Scott CDA PHA policy will therefore remain:	
Chapter 3: Eligibility		
3-I.K. – FOSTER CHILDREN AND FOSTER ADULTS	**HUD Policy:** Added clarifying language to their regulation: Foster children or adults are permitted to live in an assisted unit with the PHA's permission. A PHA refusal to allow a family to have a foster child or foster children may constitute a violation of the familial status provisions of the Fair Housing Act. *and* The administrative plan must include policies concerning residency by a foster child or foster adult, including defining when PHA consent for occupancy by a foster child or foster adult must be given or may be denied [24 CFR 982.54].	
3.II.B. – CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS ***U.S Citizens and Nationals***	**HUD added language to Policy:** U.S. citizens or U.S. nationals (or the parent/guardian for family members under age 18) must sign a declaration of their status, under penalty of perjury. *and* HUD strongly encourages PHAs to require that families provide proof of citizenship by such means as birth certificates, naturalization certificates, passports, or other documentation.	

	HUD Changes 1/1/2027	PHA Changes 1/1/2027
Eligible Noncitizens	**HUD added language to policy:** Eligible noncitizens (or the parent/guardian for family members under age 18) must sign a declaration of their status, under penalty of perjury.	
Ineligible Noncitizens	**HUD added language to policy:** Family members who do not sign a declaration of their status or provide the required supporting documentation will be considered ineligible for housing assistance. When reviewing applicants for assistance, if a PHA formally makes a finding of fact or conclusion of law, supported by a determination from the Department of Homeland Security (DHS) or the Executive Office of Immigration Review (e.g., a Final Order of Deportation), that an individual is not lawfully present in the United States, then the PHA must provide to DHS a report of the person's name, address, and other identifying information that the PHA has. Note that a SAVE response of no service record or verification of an immigration status that makes the individual ineligible for housing assistance is not a finding of fact or conclusion of law that the individual is not lawfully present. At least four times annually, PHAs must provide such information to DHS. If a PHA has knowledge of an individual who is not lawfully present in the United States, they must provide a report to DHS within 45 days after the close of the appropriate calendar year quarter [HUD Secretary Letter 12/16/25].	
3-III.B. - MANDATORY DENIAL OF ASSISTANCE	**HUD added Policy:** Under mandatory denial of assistance, HUD added two additional denial reasons: Any member of the family fails to sign and submit consent forms to obtain information. *and* The family does not meet the restrictions on net assets and real property ownership as required by 24 CFR 5.618.	

3-III.C. RESTRICTION ON ASSISTANCE BASED ON ASSETS [24 CFR 5.618]	**New HUD Regulation** There are two circumstances under which a family is ineligible to receive assistance based on asset ownership. **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).** • This amount is listed in HUD's current year Inflation-Adjusted Values tables **Second, the family has real property that is suitable for occupancy by the family as a residence and the family has:** • A present ownership interest in the real property; and • A legal right to reside in the real property; and • The effective legal authority to sell (based on state or local laws of the jurisdiction where the property is located) the real property. **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:** • Any property for which the family is receiving assistance for a manufactured home under 24 CFR 982.620 or under the HCV Homeownership program; • Any property that is jointly owned by a member of the family and at least one non-household member who does not live with the family, if the non-household member resides at the jointly owned property; • Any family that is offering the property for sale; or • Any person who is a victim of domestic violence, dating violence, sexual assault, stalking or human trafficking. When a family asks for an exception because a family member is a victim of domestic violence, dating violence, sexual assault, stalking or human trafficking, 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. A property is considered suitable for occupancy unless the family demonstrates that it:	**Added PHA Policy** A property that is not considered suitable for occupancy: The PHA defines *not sufficient for the size of the family* as being overcrowded based on space standards in Chapter 8 of this policy. • 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); **Added PHA Policy**: In general, the PHA defines a *geographic hardship* 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 geographic hardship is present. • 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 • Is not a property that a family may reside in under the state or local laws of the jurisdiction where the property is located. 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

	HUD Changes 1/1/2027	PHA Changes 1/1/2027
	• 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.); • Is not sufficient for the size of the family;	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
3-III.E. SCREENING	**<u>HUD added Policy:</u>** Applicants must provide a complete list of all states in which any household member has resided. Failure to accurately respond to any question during the application process is cause to deny the family admission [Notice PIH 2012-28].	
3.III.F. CRITERIA FOR DECIDING TO DENY ASSISTANCE	**Consideration of Circumstances** **<u>HUD Language Change from *must* to *may*:</u>** When there is a record of arrest, the PHA **<u>may</u>** obtain a copy of the police report associated with the arrest and consider the circumstances of the arrest, including: • Any statements made by witnesses, or the applicant not included in the police report • Whether criminal charges were filed • Whether, if filed, criminal charges were abandoned, dismissed, not prosecuted, or ultimately resulted in an acquittal • Any other evidence relevant to determining whether or not the applicant engaged in disqualifying activity	

Chapter 4: Applications, Waiting List, and Tenant Selection

4.-I.D. PLACEMENT ON THE WAITING LIST	**<u>HUD Language Changed from “Must” to “May”:</u>** The PHA may review each complete application received and make a preliminary assessment of the family’s eligibility **<u>HUD Language Changed from “qualify to claimed” noting that households are claiming to meet preferences but that doesn’t always mean they qualify for them.</u>** For HCV Waiting list Applicants, they will be placed on the waiting list(s) by date and time of application and according to PHA preferences they claimed. For Project Based Waiting List Applicants, they will be placed on the waiting list(s) by date and time of application and according to PHA preferences they claimed	

	HUD Changes 1/1/2027	PHA Changes 1/1/2027
4-II.B. ORGANIZATION OF THE WAITING LIST:		**PHA Policy Changed and added a new *Family Unification Program* Waiting List:** The PHA will maintain a single waiting list for the HCV program except for exempted Special Purpose Voucher Programs where a waiver or exemption to the requirement of having a single HCV Program waiting list applies. Below are the programs the PHA has chosen to establish and maintain a separate waiting list based on HUD approved waiver or exemption: • Mainstream Program • Family Unification Program For Mainstream Program, The PHA chose to adopt a separate Mainstream voucher waiting list in accordance with Notice PIH 2024-30. Prior to Notice PIH 2024-30, PHAs were required to select Mainstream voucher applicants from its HCV waiting list. For FUP, Waiting List Placement: The PHA chose to adopt a separate FUP waiting list in accordance with Notice PIH 2025-08.
4-III.B. SELECTION AND HCV FUNDING SOURCE:		**PHA Policy Change:** Removed FUP as a targeted funding source, since we adopted a separate waiting list.

4-III.C. SELECTION METHOD		**PHA Local Preferences Change [24 CFR 982.207; HCV p. 4-16]** PHAs are permitted to establish local preferences, and to give priority to serving families that meet those criteria. HUD specifically authorizes and places restrictions on certain types of local preferences. HUD also permits the PHA to establish other local preferences, at its discretion. Any local preferences established must be consistent with the PHA plan and the consolidated plan and must be based on local housing needs and priorities that can be documented by generally accepted data sources. **PHA Policy Added Locial Housing Prevention Aide Youth Program and removed Housing Trust Fund:** ***The PHA will use the following local preferences:*** A. Active Participants of Scott County Specialized Emergency Family Housing (also referred to as residents of Hopes Portage) and Community Action Partnership (CAP) Family Shelter Program. (5 points) B. Active participants of Bridges or Bridges Regional Treatment Center Program who reside in Scott County and individuals or families transitioning or "moving up" from Permanent Supportive Housing units in Scott County (4 points). C. Active Participants of the Local Housing Prevention Aide Youth Program, Family Unification Program-Youth (FUPY) voucher in Scott County (3 points).

	HUD Changes 1/1/2027	PHA Changes 1/1/2027
		D. Current Scott County residents or households with community roots. Community roots are defined as applicants who live, work or have been hired to work in Scott County (2 points). E. Displaced person(s): Individuals or families displaced by government action or whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief laws (1 point). F. All other applicants who do not meet the definitions in the other preference categories.

<table>
<tr><th></th><th>HUD Changes</th><th>PHA Changes</th></tr>
<tr><td colspan="3">Chapter 5: Briefings and Voucher Issuance</td></tr>
<tr><td>5-I.C Family Obligations</td><td>HUD Added VAWA language to the following obligation:
• The family must not commit any serious or repeated violation of the lease. Added:
Any incidents of actual or threatened domestic violence, dating violence, sexual assault, stalking, or human trafficking will not be construed as serious or repeated lease violations by the victim or as good cause to terminate the tenancy, occupancy rights, or assistance of the victim.</td><td></td></tr>
<tr><td colspan="3">Chapter 6: Income and Subsidy Determinations:
New HOTMA Regulations: See Attached Chapter 6 for red-lined details of the HUD and PHA Changes</td></tr>
<tr><td>6-I.A. OVERVIEW</td><td>Annual income includes:
• All amounts, not specifically excluded in 24 CFR 5.609(b);
• All amounts received from all sources (other than those specifically excluded in 24 CFR 5.609(b)) by each member of the family who is 18 years of age or older or is the head of household or spouse;
• Unearned income (other than those sources specifically excluded in 24 CFR 5.609(b)) by or on behalf of each dependent who is under 18 years of age; and
• Imputed returns of an asset based on the current passbook savings rate, as determined by HUD, when the value of net family assets exceeds the HUD-published threshold amount (adjusted annually and published in HUD's Inflation-Adjusted Values tables) and the actual returns from a given asset cannot be calculated.

In addition to this general definition, the regulations at 24 CFR 5.609(b) provide a comprehensive listing of all sources of income that are excluded from annual income. Note, unlike in previous versions of the regulations, the current regulations governing annual income do not list sources of income that are to be included. Instead, HUD relies on the definition of excluded income under 24</td><td></td></tr>
</table>

	HUD Changes	PHA Changes
	CFR 5.609(b) to provide the scope of what is included. To that end, generally, all income is included unless it is specifically excluded by regulation. Annual income includes "all amounts received," not the amount that a family may be legally entitled to receive but did not receive. For example, a family's child support or alimony income must be based on payments received, not the amounts to which the family is entitled by court or agency orders. 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 must use the gross amount of the income, prior to the reduction, to determine a family's annual income [Notice PIH 2023-27]. Annual income also includes all actual anticipated income from assets (provided the income is not otherwise excluded) even if the asset itself is excluded from net family assets [Notice PIH 2023-27]. 24 CFR 5.603(b)(1) describes HUD regulations for treating specific types of income and assets.	
6-I.B. HOUSEHOLD COMPOSITION AND INCOME	**HUD Language-Clarified:** Clarified the income included and excluded depending on the type of family member (live in aide, foster child, etc). Specified if earned and/or unearned income is counted or not.	
Temporarily Absent Family Members	**HUD Language Changed:** The current regulations governing annual income do not specifically address temporarily absent family members. The regulations also do not define "temporarily" or "permanently" absent or specify a timeframe associated with a temporary versus a permanent absence.	**NEW PHA Policy Language:** Added: *Unless specifically excluded by the regulations, the income of all family members approved to live in the unit will be counted, even if the family member is temporarily absent from the unit.* Generally, an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less for educational activities, placement in foster care, employment, illness, and court order is considered temporarily absent and continues to be considered a family member.

	HUD Changes	PHA Changes
6-I.C. ANTICIPATING ANNUAL INCOME	**HUD Policy Change:** **Anticipating Annual Income [24 CFR 5.609(c)(1)]** The methodology used for calculating income differs depending on whether income is being calculated at initial occupancy, interim reexamination, or at annual reexamination. However, income from assets is always anticipated regardless of certification type. At initial occupancy and for an interim reexamination of family income, the PHA is required to use anticipated income (current income) for the upcoming 12-month period following the new admission or interim reexamination effective date. Policies related to verifying income are found in Chapter 7.	**PHA Policy Change:** When the PHA cannot readily anticipate income based upon current circumstances (e.g., in the case of temporary, sporadic, or variable employment, seasonal employment, unstable working hours, or suspected fraud), the PHA will review and analyze historical data for patterns of employment, paid benefits, and receipt of other income and use the results of this analysis to establish annual income. Any time current circumstances are not used to project annual income, a clear rationale for the decision will be documented in the file. In all such cases the family may present information and documentation to the PHA to show why the historic pattern does not represent the family's anticipated income. In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how the PHA annualized projected income. ***Known Changes in Income*** If the PHA verifies an upcoming increase or decrease in income at admission or interim reexamination, annual income will be projected by applying each income amount to the appropriate part of the 12-month period.
		Example: An employer reports that a full-time employee who has been receiving $8/hour will begin to receive $8.25/hour in the eighth week after the effective date of the new admission or interim reexamination. In such a case the PHA would calculate annual income as follows:

	HUD Changes	PHA Changes
		($8/hour × 40 hours × 7 weeks) + ($8.25 × 40 hours × 45 weeks).
		The family may present information that demonstrates that implementing a change before its effective date would create a hardship for the family. In such cases the PHA will calculate annual income using current circumstances and then, should the change in income require the PHA to conduct an interim reexamination, conduct an interim reexamination in accordance with PHA policy in Chapter 11. **Calculating Annual Income at Annual Reexamination [24 CFR.609(c)(2); Notice PIH 2023-27]** At annual reexamination, except where the PHA uses a streamlined income determination, PHAs must first determine the family's income for the previous 12-month period and use this amount as the family income for annual reexaminations; however, adjustments to reflect current income must be made. Any change of income since the family's last annual reexamination, including those that did not meet the threshold to process an interim reexamination of family income in accordance with PHA policies in Chapter 11 and HUD regulations, must be considered. If, however, there have been no changes to income, then the amount of income calculated for the previous 12-month period is the amount that will be used to determine the family's rental assistance. Income from assets is always anticipated, irrespective of the income examination type. Policies related to conducting annual reexaminations are located in Chapter 11.

	HUD Changes	PHA Changes
6-I.D. Earned Income ***Earned Income of Full-Time Students*** ***[24 CFR 5.609(b)(14)]***	**HUD Language Added:** To be considered "full-time," a student must be considered "full-time" by an educational institution with a degree or certificate program.	
6-I.F. STUDENT FINANCIAL ASSISTANCE [FR Notice 2/14/23 and Notice PIH 2023-27]	**Calculating Income from Student Financial Assistance [HOTMA Student Financial Assistance Resource Sheet; Notice PIH 2023-27** **HUD Policy Change—removes exceptions to student income from financial assistance deductions.** The formula for calculating student financial assistance always begins with deducting the assistance received under 479B of the HEA from the total actual covered costs, because the 479B assistance is intended to pay the student's actual covered costs. When a student receives assistance from both Title IV of the HEA and from other sources, the assistance received under Title IV of the HEA must be applied to the student's actual covered costs first and then other student financial assistance is applied to any remaining actual covered costs. Once actual costs are covered, any remaining student financial assistance is considered income.	**PHA Policy Change**: If the student does not receive any assistance under Title IV of the HEA but does receive assistance from another source, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The PHA will then subtract the total amount of the student's financial assistance from the student's actual covered costs. The PHA will include any amount of financial assistance in excess of the student's actual covered costs in the family's annual income. When a student receives assistance from both Title IV of the HEA and from other sources, the PHA will first calculate the actual covered costs to the student in accordance with 24 CFR 5.609(b)(ii). The assistance received under Title IV of the HEA will be applied to the student's actual covered costs first and then the other student financial assistance will be applied to any remaining actual covered costs. If the amount of assistance excluded under Title IV of the HEA equals or exceeds the actual covered costs, none of the assistance included under other student financial assistance" would be excluded from income.

	HUD Changes	PHA Changes
6-I.G. PERIODIC PAYMENTS	**HUD Policy Change:** **Alimony and Child Support [Notice PIH 2023-27]** Annual income includes all amounts received, not the amount that a family may be legally entitled to receive but did not. As such, a family's child support or alimony income must be based on payments received, not the amounts the family is entitled to receive based on any court or agency order. A copy of a court order or other written payment agreement alone may not be sufficient verification of amounts received by a family.	**PHA Policy Change:** The PHA will count all regular payments of alimony or child support awarded as part of a divorce or separation agreement unless the family certifies and the PHA verifies that the payments are not being made. *Family Claims No Payments Being Received:* In order to verify that payments are not being made, the PHA will review child support payments over the last three months. If no payments have been made in the past three months and there are no lump sums, the PHA will not include alimony or child support in annual income. *Payments Being Received:* If payments are being made regularly, the PHA will use the amount received during the last 90 days (excluding any lump sums received). If payments have been made for a period less than 90 days, the PHA will average all payments that have been made. *Lump Sum Payments:* At new admission or interim recertification, if any lump sum payments were made in the past 90 days, the PHA will determine the likelihood of the family receiving another similar payment within the next 12 months before deciding whether or not this amount will be included in the calculation of annual income. If the PHA determines and can appropriately verify that the family in all likelihood will not receive a similar payment, then the amount will not be considered when projecting annual income. If the PHA determines that it is likely that the family will receive a similar payment and can appropriately verify it, the amount will be included when projecting annual income.

	HUD Changes	PHA Changes
PART II. ASSETS **6-II.A. OVERVIEW**	**HUD Policy Change:** Annual income includes all actual anticipated income from assets (unless otherwise excluded by the regulations) even if the asset itself is excluded from net family assets [Notice PIH 2023-27]. The regulation at 24 CFR 5.603(b)(3) provides a list of items that are excluded from the calculation of net family assets. Note, unlike previous versions of the regulations, the current regulations do not list types of assets that are included in annual income. Instead, HUD relies on the definition of items excluded from assets to provide the scope of what is included. Exhibit 6-2 provides the regulatory definition of net family assets. Optional policies for family self-certification of assets are found in Chapter 7. Policies related to the asset limitation may be found in Chapters 3 and 12. Income from assets is always anticipated, irrespective of the income examination type**.**	**PHA Policy Change:** The PHA generally will use current circumstances to determine both the value of an asset and the anticipated income from the asset. The PHA will use other than current circumstances to anticipate income when (1) an imminent change in circumstances is expected, (2) it is not feasible to anticipate a level of income over 12 months, or (3) the PHA believes that past income is the best indicator of anticipated income. For example, if a family member owns real property that typically receives rental income, but the property is currently vacant, the PHA can take into consideration past rental income along with the prospects of obtaining a new tenant. Any time current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. In such cases the family may present information and documentation to the PHA to show why the asset income determination does not represent the family's anticipated asset income.

	HUD Changes	PHA Changes
6-II.B. ASSETS DISPOSED OF FOR LESS THAN FAIR MARKET VALUE [24 CFR 5.603(b)(2)]	**HUD Policy Change**: PHAs must include the value of any business or family assets disposed of by an applicant or participant for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application or reexamination, as applicable, in excess of the consideration received for the asset. An asset moved to a retirement account held by a member of the family is not considered to be an asset disposed of for less than fair market value [Notice PIH 2023-27]. The family must certify whether any assets have been disposed of for less than fair market value in the preceding two years.	**PHA Policy Change:** The PHA will not include the value of assets disposed of for less than fair market value unless the cumulative fair market value of all assets disposed of during the past two years exceeds the gross amount received for the assets by more than $1,000.
Minimum Threshold	**HUD Policy Change**: The *HCV Guidebook* permits the PHA to set a threshold below which assets disposed of for less than fair market value will not be counted [HCV GB, p. 5-27].	
Separation or Divorce	**HUD Policy Change**: The regulation also specifies that assets are not considered disposed of for less than fair market value if they are disposed of as part of a separation or divorce settlement and the applicant or tenant receives important consideration not measurable in dollar terms.	**PHA Policy Change:** All assets disposed of as part of a separation or divorce settlement will be considered assets for which important consideration not measurable in monetary terms has been received. In order to qualify for this exemption, a family member must be subject to a formal separation or divorce settlement agreement established through arbitration, mediation, or court order.
Foreclosure or Bankruptcy	**HUD Policy Change**: Assets are not considered disposed of for less than fair market value when the disposition is the result of a foreclosure or bankruptcy sale. Negative equity in real property or other investments does not prohibit the owner from selling the property or other investments, so negative equity alone would not justify excluding the property or other investments from family assets.	
Family Declaration		**PHA Policy Change:** Families must sign a declaration form at initial certification and each annual recertification identifying all assets that have been disposed of

	HUD Changes	PHA Changes
		for less than fair market value or declaring that no assets have been disposed of for less than fair market value. The PHA may verify the value of the assets disposed of if other information available to the PHA does not appear to agree with the information reported by the family.
6-II.C. ASSET INCLUSIONS AND EXCLUSIONS	***HUD Policy Change:*** ***Necessary and Non-Necessary Personal Property [24 CFR 5.603(b)(3)(i)]*** All assets are categorized as either *real property* (e.g., land, a home) or *personal property*. *Personal property* includes tangible items, like boats, as well as intangible items, like bank accounts. 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. HUD defines *necessary personal property* 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 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. The combined value of all **non-necessary** 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	**PHA Policy Change:** 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.

	HUD Changes	PHA Changes
	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. While not an exhaustive list, the following table from Notice PIH 2023-27 provides examples of necessary and non-necessary personal property	

Necessary Personal Property	Non-Necessary Personal Property
Car(s)/vehicle(s) that a family relies on for transportation for personal or business use (e.g., bike, motorcycle, skateboard, scooter) Furniture, carpets, linens, kitchenware Common appliances Common electronics (e.g., radio, television, DVD player, gaming system) Clothing Personal effects that are not luxury items (e.g., toys, books) Wedding and engagement rings Jewelry used in religious/cultural celebrations and ceremonies Religious and cultural items Medical equipment and supplies Health care–related supplies Musical instruments used by the family Personal computers, phones, tablets, and related equipment Professional tools of trade of the family, for example professional books Educational materials and equipment used by the family, including equipment to accommodate persons with disabilities Equipment used for exercising (e.g., treadmill, stationary bike, kayak, paddleboard, ski equipment)	Recreational car/vehicle not needed for day-to-day transportation for personal or business use (campers, motorhomes, traveling trailers, all-terrain vehicles (ATVs)) Bank accounts or other financial investments (e.g., checking account, savings account, stocks/bonds) Recreational boat/watercraft Expensive jewelry without religious or cultural value, or which does not hold family significance Collectibles (e.g., coins/stamps) Equipment/machinery that is not used to generate income for a business Items such as gems/precious metals, antique cars, artwork, etc.

	HUD Changes	PHA Changes
Checking and Savings Accounts [Notice PIH 2023-27]	**HUD Policy Change:** HUD considers bank accounts as non-necessary items of personal property. Whether or not non-necessary personal property is counted toward net family assets depends on the combined value of all of the family's assets. • When the combined value of net family assets is greater than the HUD-published threshold amount, which is adjusted annually and listed in HUD's current year Inflation Adjusted Values tables, 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. However, actual income from checking and savings accounts is always included in a family's annual income, regardless of the total value of net family assets or whether the asset itself is included or excluded from net family assets, unless that income is specifically excluded.	
ABLE Accounts [24 CFR 5.609(b)(10); Notice PIH 2019-09]	**HUD Policy Change:** An Achieving a Better Life Experience (ABLE) account is a type of tax-advantaged savings account that an eligible individual can use to pay for qualified disability expenses. Section 103 of the ABLE Act mandates that an individual's ABLE account (specifically, its account balance, contributions to the account, and distributions from the account) is excluded when determining the designated beneficiary's eligibility and continued occupancy under certain federal means-tested programs. The PHA must exclude the entire value of the individual's ABLE account from the household's assets. Distributions from the ABLE account are also not considered income. However, all wage income received, regardless of which account the money is paid to, is included as income.	

	HUD Changes	PHA Changes
Investment Accounts Such as Stocks, Bonds, Saving Certificates, and Money Market Funds [24 CFR 5.603(b)(1)]	**HUD Policy Change:** HUD considers financial investments such as stocks and bonds non-necessary items of personal property. Whether non-necessary personal property is counted toward net family assets depends on the combined value of all of the family's assets. • When the combined value of net family assets is greater than the HUD-published threshold amount, which is adjusted annually and listed in HUD's Inflation Adjusted Values tables, financial investments such as stocks and bonds are considered part of net family assets. In this case, the value of the family's financial investments such as stocks and bonds 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 financial investments such as stocks and bonds would not be considered when calculating net family assets. However, actual income from financial accounts is always included in a family's annual income, regardless of the total value of net family assets or whether the asset itself is included or excluded from net family assets, unless that income is specifically excluded. When a stock issues dividends in some years but not others (e.g., due to market performance), the dividend is counted as the actual return when it is issued, but when no dividend is issued, the actual return is $0. When the stock never issues dividends, the actual return is $0.	**PHA Policy Change:** The PHA will include interest or dividends earned by investment accounts as actual income from assets even when the earnings are reinvested. The cash value of such an asset is determined by deducting from the market value any broker fees, penalties for early withdrawal, or other costs of converting the asset to cash. In determining the market value of an investment account, the PHA will use the value of the account on the most recent investment report.
Lump-Sum Additions to Net Family Assets [24 CFR 5.609(b)(24(viii); Notice PIH 2023-27]	**HUD Policy Change:** The regulations exclude income from lump-sum additions to family assets, including lottery or other contest winnings as a type of nonrecurring income. In addition, lump sums from insurance payments, settlements for personal or property losses, and recoveries from civil actions or settlements based on claims of malpractice, negligence, or other breach of duty owed to a family member arising out of law that resulted in a member of the family becoming a family member with a disability are excluded from income. Further, deferred periodic amounts from Supplemental Security Income (SSI) and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts, or any deferred Department of Veterans Affairs disability	**PHA Policy Change:** Any lump-sum receipts are only counted as assets if they are retained by a family in a form recognizable as an asset. [RHIIP FAQs]. For example, if the family receives a $10,000 lump sum for lottery winnings, and the family immediately spends the entire amount, the lump sum will not be counted toward net family assets

	HUD Changes	PHA Changes
	benefits that are received in a lump sum amount or in prospective monthly amounts are also excluded from income. However, these amounts may count towards net family assets. The PHA must consider any actual or imputed returns from assets as income at the next applicable income examination. In the case where the lump sum addition to assets would lead to imputed income, which is unearned income, that increases the family's annual adjusted income by 10 percent or more, then the addition of the lump sum to the family's assets will trigger an immediate interim reexamination of income in accordance with Chapter 11. This reexamination of income must take place as soon as the lump sum is added to the family's net family assets unless the addition takes place in the last three months of family's income certification period and the PHA chooses not to conduct the examination. For a discussion of lump-sum payments that represent the delayed start of a periodic payment, most of which are counted as income, see sections 6-I.H and 6-I.I.	
Jointly Owned Assets [Notice PIH 2023-27]	**HUD Policy Change:** For assets owned jointly by the family and one or more individuals outside of the assisted family, the PHA must include the total value of the asset in the calculation of net family assets, unless: • The asset is otherwise excluded; • The family can demonstrate that the asset is inaccessible to them; or • The family cannot dispose of any portion of the asset without the consent of another owner who refuses to comply. If the family demonstrates that they can only access a portion of an asset, then only that portion's value is included in the calculation of net family assets for the family. Any income from a jointly owned asset must be included in annual income, unless: • The income is specifically excluded; • The family demonstrates that they do not have access to the income from that asset; or • The family only has access to a portion of the income from that asset.	

	HUD Changes	PHA Changes
	If the family demonstrates that they can only access a portion of the income from an asset, then only that portion's value is included in the calculation of income from assets. If an individual is a beneficiary who is entitled to access the account's funds only upon the death of the account's owner, and may not otherwise withdraw funds from an account, then the account is not an asset to the assisted family, and the family should provide proper documentation demonstrating that they are only a beneficiary on the account.	
Trusts [24 CFR 5.609(b)(2) and 5.603(b)(4)]	**HUD Policy Change:** A *trust* is a legal arrangement generally regulated by state law in which one party (the creator or grantor) transfers property to a second party (the trustee) who holds the property for the benefit of one or more third parties (the beneficiaries). The basis for determining how to treat trusts relies on information about who has access to either the principal in the account or the income from the account. There are two types of trusts, *revocable* and *irrevocable*. When the creator sets up an *irrevocable trust*, the creator has no access to the funds in the account. Typically, special needs trusts are considered irrevocable. Irrevocable trusts not under the control of any member of the family are excluded from net family assets. The value of the trust continues to be excluded from net family assets, so long as the fund continues to be held in a trust that is not revocable by, or under the control of, any member of the family or household [24 CFR 5.603(b)(4)]. Further, where an irrevocable trust is excluded from net family assets, the PHA must not consider actual income earned by the trust (e.g., interest earned, rental income if property is held in the trust) for so long as the income from the trust is not distributed. A *revocable trust* is a trust that the creator of the trust may amend or end (revoke). When there is a revocable trust, the creator has access to the funds in the trust account. • A revocable trust that is under the control of the family is included in net family assets when the grantor is a member of the assisted family. If a revocable trust is included in the calculation of net family assets, then the actual income earned by the revocable trust is also included in the family's income. For example, interest earned or rental income if the property is held in the trust. The PHA must calculate imputed income on the revocable trust	

	HUD Changes	PHA Changes
	if net family assets are more than the HUD-published threshold amount, which is adjusted annually and listed in HUD's Inflation Adjusted Values tables ($54,898 for 2027), and actual income from the trust cannot be calculated (e.g., if the trust is comprised of farmland that is not in use). • A revocable trust that is not under the control of the family is excluded from net family assets. This happens when a member of the assisted family is the beneficiary of a revocable trust, but the grantor is not a member of the assisted family. In this case the beneficiary does not "own" the revocable trust, and the value of the trust is excluded from net family assets. For the revocable trust to be considered excluded from net family assets, no family or household member may be the account's trustee. For both irrevocable and revocable trusts, if the value of the trust is not considered part of net family assets, then distributions from the trust are treated as follows: • All distributions from the trust's principal are excluded from income. • Distributions of income earned by the trust (i.e., interest, dividends, realized gains, or other earnings on the trust's principal), are included as income unless the distribution is used to pay for the health and medical expenses for a minor.	
Life Insurance [FR Notice 2/14/23 and Notice PIH 2023-27]	**HUD Policy Change:** Net family assets do not include the value of term life insurance, which has no cash value to the individual before death. The cash value of a life insurance policy available to a family member before death, such as a whole life or universal life policy, is included in the calculation of the value of the family's assets. The cash value is the surrender value. While the cash value of an insurance policy is considered an asset, the face value of any policy is not. If such a policy earns dividends or interest that the family could elect to receive, the amount of dividends or interest is counted as income from the asset whether or not the family actually receives it.	
Tax Refunds [24 CFR 5.603(b)(3)(xi) and Notice PIH 2023-27]	**HUD Policy Change:**	

	HUD Changes	PHA Changes
	All amounts received by a family in the form of federal tax refunds or refundable tax credits are excluded from a family's net family assets for a period of 12 months after receipt by the family. At the time of an annual or interim reexamination of income, if the federal tax refund was received during the 12 months preceding the effective date of the reexamination, then the amount of the refund that was received by the family is subtracted from the total value of net family assets. When the subtraction results in a negative number, then net family assets are considered $0. PHAs are not required to verify the amount of the family's federal tax refund or refundable tax credits if the family's net assets are equal to or below the HUD-determined threshold (adjusted annually for inflation), even in years when full verification of assets is required or if the PHA does not accept self-certification of assets. PHAs must verify the amount of the family's federal tax refund or refundable tax credits if the family's net assets are greater than the HUD-determined threshold. The anticipated income earned by the assets in which a family has deposited their federal tax refund or refundable tax credits must be included in the family's annual income unless the income is specifically excluded.	
Asset Exclusions [24 CFR 5.603(b)]	**HUD Policy Change:** The following are excluded from the calculations of net family assets: • The value of any account under a retirement plan recognized as such by the IRS, including individual retirement arrangements (IRAs), employer retirement plans, and retirement plans for self-employed individuals [24 CFR 5.603(b)(3)(iii)]. • The value of real property that the family does not have the effective legal authority to sell in the jurisdiction in which the property is located [24 CFR 5.603(b)(3)(iv)]. - *Real property* as used in this part has the same meaning as that provided under the law of the state in which the property is located [24 CFR 5.100]. - Examples of this include but are not limited to co-ownership situations (including situations where one owner is a victim of domestic violence), where one party cannot unilaterally sell the real property; property that	

	HUD Changes	PHA Changes
	is tied up in litigation; and inherited property in dispute [Notice PIH 2023-27]. • Any amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty owed to a family member arising out of law, that resulted in a family member being a person with a disability [24 CFR 5.603(b)(3)(v)]; • The value of any Coverdell education savings account under section 530 of the Internal Revenue Code of 1986 [24 CFR 5.603(b)(3)(vi)]; • The value of any qualified tuition program under Section 529 of such Code [24 CFR 5.603(b)(3)(vi)]; • The value of any “baby bond” account created, authorized, or funded by federal, state, or local government [24 CFR 5.603(b)(3)(vi)]; • Interests in Indian trust land [24 CFR 5.603(b)(3)(vii)]; • Equity in a manufactured home where the family receives assistance under 24 CFR part 982 [24 CFR 5.603(b)(3)(viii)]; • Equity in property under the Homeownership Option for which a family receives assistance under 24 CFR part 982 [24 CFR 5.603(b)(3)(ix)]; • Family Self-Sufficiency accounts [24 CFR 5.603(b)(3)(x)]; • Federal tax refunds or refundable tax credits for a period of 12 months after receipt by the family [24 CFR 5.603(b)(3)(xi)]. • The full amount of assets held in an irrevocable trust [Notice PIH 2023-27]; and • The full amount of assets held in a revocable trust where a member of the family is the beneficiary, but the grantor/owner and trustee of the trust is not a member of the participant family or household [Notice PIH 2023-27].	
6-II.D. DETERMINING INCOME FROM ASSETS	**HUD Policy Change:** In some cases, amounts that are excluded from net family assets may be included as annual income when disbursements are made to a family from an asset. In other cases, amounts are excluded from annual income as a lump-sum addition to net family assets, but those funds are then considered a net family asset if	

	HUD Changes	PHA Changes
	held in an account or other investment that is considered part of net family assets [Notice PIH 2023-27].	
Net Family Assets	**HUD Policy Change:** *Net family assets* are defined as the net cash value of all assets owned by the family, after deducting reasonable costs that would be incurred in disposing real property, savings, stocks, bonds, and other forms of capital investment. The calculation of asset income sometimes requires the PHA to make a distinction between an asset's market value and its cash value. • The market value of an asset is its worth in the market (e.g., the amount a buyer would pay for real estate or the total value of an investment account). • The cash value of an asset is its market value less all reasonable amounts that would be incurred when converting the asset to cash. The cash value of real property or other assets with negative equity would be considered $0 for the purposes of calculating net family assets. Negative equity in real property or other investments does not prohibit the family from selling the property or other investments, so negative equity alone would not justify excluding the property or other investments from family assets [Notice PIH 2023-27].	**PHA Policy Change:** Reasonable costs that would be incurred when disposing of an asset include, but are not limited to, penalties for premature withdrawal, broker and legal fees, and settlement costs incurred in real estate transactions such as settlement costs and transfer taxes [New PH OCC GB, *Income Determinations,* p. 24].
Actual Income from Assets	**HUD Policy Change:** Income from assets must be included on the Form HUD-50058 regardless of the amount of income. Actual income from assets is always included in a family's annual income, regardless of the total value of net family assets or whether the asset itself is included or excluded from net family assets, unless that income is specifically excluded by 24 CFR 5.609(b). Income or returns from assets are generally considered to be interest, dividend payments, and other actual income earned on the asset, and not the increase in market value of the asset. The increase in market value is relevant to the cash value of the asset for the purpose of determining total net family assets and imputing income. The PHA may determine the net assets of a family based on a self-certification by the family that the net family assets do not exceed the HUD-published threshold amount, which is adjusted annually and listed in HUD's Inflation Adjusted Values tables, without taking additional steps to verify the accuracy of the declaration	

	HUD Changes	PHA Changes
	[24 CFR 5.618(b)]. Policies related to verification of assets are found in Chapter 7 of this policy. The PHA may not calculate or include any imputed income from assets when net family assets are less than or equal to the HUD-published threshold amount [24 CFR 5.609(b)(1)]. The actual income from assets must be included on the Form HUD-50058.	
Imputed Income from Assets	**HUD Policy Change:** When net family assets exceed the HUD-published threshold amount, which is adjusted annually and listed in HUD's Inflation Adjusted Values tables, the PHA may not rely on self-certification. If actual returns can be calculated, the PHA must include actual income from the asset on the Form HUD-50058 (for example, a savings account or CD where the rate of return is known). If actual returns cannot be calculated, the PHA must calculate imputed returns using the HUD-determined passbook rate (for example, real property or a non-necessary item of personal property such as a recreational boat). Imputed income is calculated by multiplying the net cash value of the asset (found by deducting reasonable costs that would be incurred in disposing of the asset from the market value) by the HUD-published passbook rate. If the PHA can compute actual income from some but not all assets, the PHA must compute actual returns where possible and use the HUD-determined passbook rate for assets where actual income cannot be calculated [24 CFR 5.609(a)(2)]. An asset with an actual return of $0 (such as a non-interest-bearing checking account), is not the same as an asset for which an actual return cannot be computed (such as non-necessary personal property). If the asset is a financial asset and there is no income generated (for example, a bank account with a zero percent interest rate or a stock that does not issue cash dividends), then the asset generates zero actual asset income, and imputed income is not calculated. When a stock issues dividends in some years but not others (e.g., due to market performance), the dividend is counted as the actual return when it is issued, and when no dividend is issued, the actual return is $0. When the stock never issues dividends, the actual return is consistently $0	

	HUD Changes	PHA Changes
6-III.A. INTRODUCTION **Overview**	**HUD Policy Change:** HUD regulations require PHAs to deduct from annual income any of five mandatory deductions for which a family qualifies and allow the PHA to deduct other permissive deductions in accordance with PHA policy. The resulting amount is the family's adjusted income. Mandatory deductions are found in 24 CFR 5.611.	
	5.611 *Adjusted income* means annual income (as determined under § 5.609) of the members of the family residing or intending to reside in the dwelling unit, after making the following deductions: (a) *Mandatory deductions* (1) \$500 for each dependent (adjusted annually by HUD, rounded to the next lowest multiple of \$25); (2) \$550 for any elderly family or disabled family (adjusted annually by HUD, rounded to the next lowest multiple of \$25); (3) The sum of the following, to the extent the sum exceeds ten percent of annual income: (i) Unreimbursed health and medical care expenses of any elderly family or disabled family; (ii) Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with disabilities, to the extent necessary to enable any member of the family (including the member who is a person with disabilities) to be employed; and (4) Any reasonable childcare expenses necessary to enable a member of the family to be employed or to further his or her education.	
	This part covers policies related to these mandatory deductions. Verification requirements related to these deductions are found in Chapter 7.	
Anticipating Expenses		**PHA Policy Change:** Generally, the PHA will use current circumstances to anticipate expenses. When possible, for costs that are expected to fluctuate during the year (e.g., childcare during school and non-school periods and cyclical medical expenses), the PHA will estimate costs based on historic data and known future costs.

	HUD Changes	PHA Changes
		If a family has an accumulated debt for medical or disability assistance expenses, the PHA will include as an eligible expense the portion of the debt that the family expects to pay during the period for which the income determination is being made. However, amounts previously deducted will not be allowed even if the amounts were not paid as expected in a preceding period. The PHA may require the family to provide documentation of payments made in the preceding year. When calculating health and medical care expenses, the PHA will include those expenses anticipated to be incurred during the 12 months following the certification date which are not covered by an outside source, such as insurance. The allowance is not intended to give a family an allowance equal to last year's expenses, but to anticipate regular ongoing and anticipated expenses during the coming year. Since these expenses are anticipated, the *PH Occupancy Guidebook* states "it is likely that actual expenses will not match what was anticipated. Typically, this would not be considered an underpayment as long as at the time of the annual reexamination, the expenses were calculated based on the appropriate verification" [New PH OCC GB, *Income Determinations,* p. 30].

	HUD Changes	PHA Changes
6-III.B. DEPENDENT DEDUCTION	**HUD Policy Change:** An allowance of $500 is deducted from annual income for each dependent (which amount 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) [24 CFR 5.611(a)(1)]. *Dependent* is defined as any family member other than the head, spouse, or cohead who is under the age of 18 or who is 18 or older and is a person with disabilities or a full-time student. Foster children, foster adults, and live-in aides are never considered dependents [24 CFR 5.603(b)].	
6-III.C. ELDERLY OR DISABLED FAMILY DEDUCTION	**HUD Policy Change:** A single deduction of $550 is taken for any elderly or disabled family (which amount 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) [24 CFR 5.611(a)(2)]. An *elderly family* is a family whose head, spouse, cohead, or sole member is 62 years of age or older, and a *disabled family* is a family whose head, spouse, cohead, or sole member is a person with disabilities [24 CFR 5.403].	

6-III.D. HEALTH AND MEDICAL CARE EXPENSES DEDUCTION [24 CFR 5.611(a)(3)(i) and 5.603(b)]	**HUD Policy Change:** Unreimbursed health and medical care expenses may be deducted to the extent that, in combination with any disability assistance expenses, they exceed ten percent of annual income. This deduction is permitted only for families in which the head, spouse, or cohead is at least 62 or is a person with disabilities. If a family is eligible for a health and medical care expense deduction, the unreimbursed health and medical care expenses of all family members are included. The PHA calculates health and medical care expenses based on the family's past expenses, but accounting for any anticipated changes in expenses during the certification period. **Definition of *Medical Expenses*** HUD regulations define *health and medical care expenses* at 24 CFR 5.603(b) to mean "any costs incurred in the diagnosis, cure, mitigation, treatment, or prevention of disease or payments for treatments affecting any structure or function of the body. Health and medical care expenses include medical insurance premiums and long-term care premiums that are paid or anticipated during the period for which annual income is computed." Health and medical care expenses may be deducted from annual income only if they are eligible under this definition and not otherwise reimbursed. Although HUD revised the definition of *health and medical care expenses* to reflect the Internal Revenue Service (IRS) general definition of medical expenses, HUD is not permitting PHAs to specifically align their policies to IRS Publication 502. PHAs must review each expense to determine whether it is eligible in accordance with HUD's definition. While PHA policies may not specifically align with IRS Publication 502, HUD recommends PHAs use it as a standard for determining allowable expenses, and the PHA may list examples of allowable expenses in their policy provided they comply with HUD's definition at 24 CFR 5.603. The PHA may not define *health and medical care expenses* more narrowly than the regulation. In accordance with the Health Insurance Portability and Accountability Act (HIPAA) (Pub. L. 104-191, 110 Stat. 1936) and the Privacy Act of 1974 (Pub. L. 93-579, 88 Stat. 1896), when requesting documentation to determine unreimbursed health and medical care expenses, the PHA may not request documentation beyond what is sufficient to determine anticipated health and medical care costs.	**PHA Policy Change:** The PHA will use the most current IRS Publication 502 as a standard for determining if expenses claimed by eligible families qualify as health and medical care expenses. However, under no circumstances will the PHA deduct any expenses listed in IRS Publication 502 that do not conform with HUD's definition of health and medical care expenses. **Summary of Typical Allowable Health and Medical Care Expenses** • Services of medical professionals • Surgery and medical procedures that are necessary, legal, and non-cosmetic • Services of medical facilities • Hospitalization, long-term care, and in-home nursing services • Prescription medicines and insulin, but not nonprescription medicines even if recommended by a doctor • Improvements to housing directly related to medical needs (e.g., ramps for a wheelchair, handrails) • Medical insurance premiums or the cost of a health maintenance organization (HMO) • Medicare Part B and Part D premiums • Substance abuse treatment programs • Psychiatric treatment • Ambulance services and some costs of transportation related to medical expenses. The PHA will use the most current medical mileage rate listed in IRS Publication 502. • The cost and care of necessary equipment related to a medical condition (e.g., eyeglasses/lenses, hearing aids, crutches, and artificial teeth)

	HUD Changes	PHA Changes
		• The costs of buying, training, and maintaining a guide dog or other service animal to assist a visually impaired or hearing disabled person, or a person with other physical disabilities. In general, this includes any costs, such as food, grooming, and veterinary care, incurred in maintaining the health and vitality of the service animal so that it may perform its duties. **Note:** This chart provides a summary of eligible health and medical care expenses only. In all cases, the PHA will consider whether health and medical expenses care expenses claimed by the family are eligible under HUD's definition. Before placing health, medical, or disability expense bills and documentation in the tenant file, the PHA will redact all personally identifiable information. If the PHA receives documentation from a verification source that contains the individual's specific diagnosis, information regarding the individual's treatment, and/or information regarding the nature or severity of the person's disability, the PHA will immediately dispose of this confidential information; this information will never be maintained in the individual's file. If the information needs to be disposed of, the PHA will note in the individual's file that verification was received, the date received, and the name and address of the person/organization that provided the verification. Under no circumstances will the PHA include an applicant's or resident's medical records in the file [Notice PIH 2010-26].

	HUD Changes	PHA Changes
Families That Qualify for Both Health and Medical and Disability Assistance Expenses		**PHA Policy Change:** This policy applies only to families in which the head, spouse, or cohead is 62 or older or is a person with disabilities. When expenses anticipated by a family could be defined as either a health and medical care or disability assistance expenses, the PHA will consider them health and medical care expenses unless it is clear that the expenses are incurred exclusively to enable a person with disabilities to work
Eligible Auxiliary Apparatus [Notice PIH 2023-27]	**HUD Policy Change:** Auxiliary apparatus items may include expenses for wheelchairs, ramps, adaptations to vehicles, guide dogs, assistance animals, or special equipment to enable a person who is blind or has low vision to read or type or special equipment to assist a person who is deaf or hard of hearing [Notice PIH 2023-27].	**PHA Policy Change:** Expenses incurred for maintaining or repairing an auxiliary apparatus are eligible. In the case of an apparatus that is specially adapted to accommodate a person with disabilities (e.g., a vehicle or computer), the cost to maintain the special adaptations (but not maintenance of the apparatus itself) is an eligible expense. The cost of service animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.

	HUD Changes	PHA Changes
Eligible Attendant Care	**Added HUD Language:** Examples of attendant care expenses can include teaching a person with disabilities how to perform day-to-day tasks independently like cleaning, bathing, doing laundry, and cooking. Attendant care can be 24-hour care, or care during sporadic periods throughout the day. The family determines the type of attendant care that is appropriate for the person with disabilities.	
6-III.G. HARDSHIP EXEMPTIONS [24 CFR 5.611(c), (d), and (e)] **Health and Medical Care and Disability Assistance Expenses [24 CFR 5.611(c); Notice PIH 2023-27]**	**HUD Policy Change**: The regulations provide for two types of hardship exemption categories for families that qualify for unreimbursed health and medical care expenses and/or disability assistance expenses. A family will benefit from this hardship exemption only if the family has eligible expenses that can be deducted in excess of five percent of annual income. In order to claim unreimbursed health and medical care expenses, the family must have a head, cohead, or spouse that is elderly or a person with a disability. In order to claim unreimbursed reasonable attendant care and auxiliary apparatus expenses, the family must include a person with a disability, and the expenses must enable any member of the family (including the member who is a person with a disability) to be employed. Families may be eligible for relief under one of two categories; phased-in relief or general relief, as defined below.	.
Phased-In Relief	**HUD Policy Change:** Phased-in relief applies to families affected by the statutory increase in the threshold for unreimbursed health and medical care expenses and/or disability assistance expenses from 3 percent to 10 percent. Qualifying families are those who received a deduction for unreimbursed health and medical care and/or reasonable attendant care or auxiliary apparatus expenses based on their most recent income review prior to the date the PHA begins implementing the relief or the applicable HOTMA compliance deadline established by notice, whichever	**PHA Policy Change:** The PHA will not continue the phased-in relief for families who move programs. These families will be treated as new admissions and the sum of expenses that exceeds 10 percent of annual income will be used to calculate their adjusted income

	HUD Changes	PHA Changes
	occurs first. These families will begin receiving a 24-month phased-in relief at their next annual or interim reexamination after that date. For these families, the threshold amount is phased-in as follows: • The family is eligible for a deduction totaling the sum of expenses that exceeds 5 percent of annual income for the first 12 months. • At the conclusion of 12 months, the family is eligible for a deduction totaling the sum of their expenses that exceed 7.5 percent of annual income for another 12 months. • At the conclusion of 24 months, the standard threshold amount of 10 percent would be used, unless the family qualifies for relief under the general hardship relief category. When an eligible family's phased-in relief begins at an interim reexamination, the PHA must process another transaction (either an interim reexamination or non-interim transaction, as applicable) one year later to move the family to the next phase. Prior to the end of the 24-month period, the family may request a hardship exemption under the second category as described below. If the family is found eligible under the second category, the hardship exemption under the first category ends, and the family's hardship is administered in accordance with the requirements listed below. Once a family requests general relief, the family may no longer receive phased-in relief. PHAs must track the 24-month phase-period for each eligible family, even if a family's expenses go below the appropriate phase-in percentage, during the first or second 12-month phase-in period. The phase-in must continue for families who move to another housing unit at the same PHA. When the family is treated as a new admission under a different property/program (e.g., the family moves from public housing to the HCV program), unless the PHA has a written policy to continue the phased-in relief upon admission, the family's expense deduction will be calculated using the 10-percent threshold unless request for general relief is approved by the PHA. When a family moves with continued assistance or ports to a new PHA, the family must continue to receive the phased-in relief. The family must receive the remaining calendar months of the percentage phase-in. The PHA must use the existing phase-in documentation to determine the remaining calendar months and the percentage phase-in.	

<table>
<tr><th></th><th>HUD Changes</th><th>PHA Changes</th></tr>
<tr><td>General Relief Policy</td><td>General Relief HUD Policy:
The second category is for families that can demonstrate:
• Their health and medical and/or disability assistance expenses increased (other than the transition to the higher threshold); or
• The family’s financial hardship is a result of a change in circumstances (as defined in PHA policy) that would not otherwise trigger an interim reexamination.
The family may request a hardship exemption under the second category regardless of whether the family previously received the health and medical and/or disability assistance deductions or are currently or were previously receiving relief under the phased-in relief category above. HUD requires that PHAs develop policies defining what constitutes a hardship for purposes of this exemption.

The PHA must obtain third-party verification of the hardship or must document in the file the reason third-party verification was not available. PHAs must attempt to obtain third-party verification prior to the end of the 90-day hardship exemption period.
The PHA must promptly notify the family in writing of the change in the determination of adjusted income and the family’s rent resulting from hardship exemptions. The notice must inform the family of when the hardship exemption will begin and expire [24 CFR 5.611(e)(2)].</td><td><u>PHA Policy Change:</u>
To qualify for a hardship exemption, a family must submit a request in writing to the PHA.
For all other families requesting a general relief hardship, the request must show that the family’s health and medical and/or disability assistance expenses have increased and that the family’s financial hardship is a result of a change in circumstances.

For this purpose, the PHA defines a change in circumstances as a decrease in income or increase in other expenses that has resulted in the family’s financial hardship but does not, on its own, trigger an interim reexamination in accordance with PHA policies. Examples of a change in circumstances include the need for new health and medical care or disability assistance expenses or an increase in the cost of qualifying expenses so that qualifying expenses exceed 5 percent of the family’s annual income.
<u>Examples of circumstances constituting a financial hardship may include the following situations:</u>
• The family is awaiting an eligibility determination for a federal, state, or local assistance program, such as a determination for unemployment compensation or disability benefits;
• The family’s income decreased because of a loss of employment, death of a family member, or due to a natural or federal/state declared disaster; or
• Other circumstances as determined by the PHA.</td></tr>
</table>

	HUD Changes	PHA Changes
		The family must provide third-party verification of the hardship with the request. If third-party verification is not available, the PHA will document the file with the reason and will attempt to obtain third-party verification prior to the end of the 90-day hardship exemption period. The PHA will comply with the Health Insurance Portability and Accountability Act (HIPAA) (Pub. L. 104-191, 110 Stat. 1936) and the Privacy Act of 1974 (Pub. L. 93-579, 88 Stat. 1896) when requesting documentation. If the PHA receives documentation from a verification source that contains the individual's specific diagnosis, information regarding the individual's treatment, and/or information regarding the nature or severity of the person's disability, the PHA will immediately dispose of this confidential information; this information will never be maintained in the individual's file. If the information needs to be disposed of, the PHA will note in the individual's file that verification was received, the date received, and the name and address of the person or organization that provided the verification. Under no circumstances will PHA include an applicant's or resident's medical records in the file [Notice PIH 2010-26]. **PHA Policy Change**: The PHA will make a determination of whether the family qualifies within 30 calendar days and will notify the family in writing of the result within 10 business days of the determination. If the PHA denies the hardship exemption request, the PHA notice will also state that if the

	HUD Changes	PHA Changes
		family does not agree with the PHA determination, the family may request a hearing. If the family qualifies for an exemption, the PHA will include the date the hardship exemption will begin and the date it will expire as well as information on how to request a 90-day extension based on family circumstances. If the family qualifies, the family will receive a deduction for the sum of eligible expenses that exceed five percent of annual income. The family's hardship relief ends when the circumstances that made the family eligible for the relief are no longer applicable or after 90 days, whichever is earlier. However, the PHA may, at its discretion, extend the relief for one or more additional 90-day periods while the family's hardship condition continues. PHAs are not limited to a maximum number of 90-day extensions. PHAs must establish written policies regarding the types of circumstances that will allow a family to qualify for a financial hardship and when such deductions may be eligible for additional 90-day extensions. PHAs must develop policies requiring families to report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. **PHA Policy Change:** The family may request an extension either orally or in writing prior to the end of the hardship exemption period. The PHA will extend relief for an additional 90-days if the family demonstrates to the PHA's

	HUD Changes	PHA Changes
		satisfaction that the family continues to qualify for the hardship exemption based on circumstances described above. The PHA will require updated verification based on the family's current circumstances. Additional extension(s) may be granted on a case-by-case basis provided the family continues to request extensions prior to the end of each hardship exemption period. Families must report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. At any time, the PHA may terminate the hardship exemption if the PHA determines that the family no longer qualifies for the exemption.
Childcare Expense Hardship Exemption [24 CFR 5.611(d) and Notice PIH 2023-27]	**HUD Policy Change:** A family whose eligibility for the childcare expense deduction is ending may request a financial hardship exemption to continue receiving the deduction. If the family demonstrates to the PHA's satisfaction that the family is unable to pay their rent because of the loss of the childcare expense deduction, and that the childcare expense is still necessary even though the family member is not working, looking for work, or seeking to further their education, the PHA must recalculate the family's adjusted income and continue the childcare deduction. The PHA must develop a policy to define what constitutes a hardship, which includes the family's inability to pay rent. The PHA must obtain third-party verification of the hardship or must document in the file the reason third-party verification was not available. PHAs must attempt to obtain third-party verification prior to the end of the 90-day hardship exemption period.	**PHA Policy Change**: For a family to qualify, they must demonstrate that their inability to pay rent would be as a result of the loss of this deduction. The PHA defines this hardship as a potential decrease in income or increase in other expenses that would result from the loss of the childcare expense and such loss would impact the family's ability to pay their rent. Some factors to consider when determining if the family is unable to pay rent may include determining that the rent, utility payment, and applicable expenses (childcare expenses or health and medical expenses) are more than 40 percent of the family's adjusted income, or verifying whether the family has experienced unanticipated expenses, such as large medical bills, that have affected their ability to pay their rent. The family must also demonstrate that the childcare expense is still necessary even though the family member is no longer employed or

	HUD Changes	PHA Changes
		furthering their education. The PHA will consider qualification under this criterion on a case-by case basis (for example, if the family member who was employed has left their job in order to provide uncompensated care to an elderly friend or family member who is severely ill and lives across town). The family must provide third-party verification of the hardship with the request. If third-party verification is not available, the PHA will document the file with the reason and will attempt to obtain third-party verification prior to the end of the 90-day hardship exemption period. The PHA must promptly notify the family in writing of the change in the determination of adjusted income and the family's rent resulting from hardship exemptions. If the PHA denies the request, the notice must specifically state the reason for the denial. PHAs must provide families 30 days' notice of any increase in rent. If the PHA approves the request, the notice must inform the family of when the hardship exemption will begin and expire [24 CFR 5.611(e)(2)]. The notice must also state the requirement for the family to report to the PHA if the circumstances that made the family eligible for relief are no longer applicable and that the family's adjusted income and tenant rent will be recalculated upon expiration of the hardship exemption [Notice PIH 2023-27]. **PHA Policy Change:** The PHA will make a determination of whether the family qualifies within 30 calendar days and will notify the family in writing of the result within 10 business days of the determination.

	HUD Changes	PHA Changes
		If the PHA denies the hardship exemption request, the PHA notice will also state that if the family does not agree with the PHA determination, the family may request an informal hearing. If the family qualifies for an exemption, the PHA will include all required information listed above as well as information on how to request a 90-day extension based on family circumstances. If the family qualifies, the hardship exemption and the resulting alternative adjusted income calculation must remain in place for a period of up to 90 days. The PHA may, at its discretion, extend the hardship exemptions for additional 90-day periods based on family circumstances and as stated in PHA policies. PHAs are not limited to a maximum number of 90-day extensions. PHAs must develop policies requiring families to report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. PHAs must promptly notify families in writing if they are denied either an initial hardship exemption or an additional 90-day extension of the exemption. If the PHA denies the request, the notice must specifically state the reason for the denial. PHAs must notify the family if the hardship exemption is no longer necessary and the hardship exemption will be terminated because the circumstances that made the family eligible for the exemption are no longer applicable. The notice must state the termination date and provide 30 days' notice of rent increase, if applicable.

	HUD Changes	PHA Changes
		PHA Policy Change: The family may request an extension either orally or in writing prior to the end of the hardship exemption period. The PHA will extend relief for an additional 90-days if the family demonstrates to the PHA's satisfaction that the family continues to qualify for the hardship exemption. The PHA will require updated verification based on the family's current circumstances. Additional extensions may be granted on a case-by-case basis provided the family continues to request extensions prior to the end of each hardship exemption period. Families must report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. At any time, the PHA may terminate the hardship exemption if the PHA determines that the family no longer qualifies for the exemption.
6-IV.C. APPLYING PAYMENT STANDARDS	***NEW* HUD Language** If the PHA has established an exception payment standard for a designated part of a an FMR area in accordance with 24 CFR 982.503 and a family's unit is located in the designated area, the PHA must use the appropriate payment standard for the exception area [24 CFR 982.505(c)(2)]. ***Decreases*** **HUD Language Changed**: If the PHA does choose to reduce the payment standard for families currently under HAP contract, the initial reduction to the payment standard may not be applied any earlier than two years following the effective date of the decrease in the payment standard and only with proper written notice to the family in accordance with 24 CFR 982.505(c)(3)(iii).	

	HUD Changes	PHA Changes
6-III.H. PERMISSIVE DEDUCTIONS [24 CFR 5.611(b)(1)(ii)]	**HUD Policy Change:** The PHA may adopt additional permissive deductions from annual income if they establish a policy in the administrative plan. Permissive deductions are additional, optional deductions that may be applied to annual income. As with mandatory deductions, permissive deductions must be based on need or family circumstance and deductions must be designed to encourage self-sufficiency or other economic purpose. If the PHA offers permissive deductions, they must be granted to all families that qualify for them and should complement existing income exclusions and deductions [PH Occ GB, p. 128]. Permissive deductions may be used to incentivize or encourage self-sufficiency and economic mobility. A PHA that adopts such deductions must have sufficient funding to cover the increased housing assistance payment cost of the deductions. A PHA will not be eligible for an increase in HCV renewal funding for subsidy costs resulting from such deductions.	**PHA Policy Change:** The PHA has opted not to use permissive deductions.

	HUD Changes	PHA Changes
6-IV.C. APPLYING PAYMENT STANDARDS [24 CFR 982.505(c) and Notice PIH 2024-34]	**HUD Added Language below:** **Overview** *If the PHA has established an exception payment standard for a designated part of a an FMR area in accordance with 24 CFR 982.503 and a family's unit is located in the designated area, the PHA must use the appropriate payment standard for the exception area [24 CFR 982.505(c)(2)].* ***Decreases* [24 CFR 982.505(c)(3) and Notice PIH 2024-34]** *If the PHA does choose to reduce the payment standard for families currently under HAP contract, the initial reduction to the payment standard may not be applied any earlier than two years following the effective date of the decrease in the payment standard and only with proper written notice to the family in accordance with 24 CFR 982.505(c)(3)(iii).*	**PHA Policy Change:** When the payment standard schedule is decreased during the term of the HAP contract, the PHA will apply decreased payment standards beginning two years following the effective date of the decrease in the payment standard. The PHA will compare the current payment standard to the payment standard last used to calculate the monthly housing assistance for the family. First annual reexamination: The PHA will use the higher of these payment standards. Second annual reexamination (unless effective on or after the two-year anniversary of the effective date of the decreased payment standard): The PHA will use the higher of the previous payment standard or the current payment standard. For any reexamination effective on or later than two years from the effective date of the decreased payment standard: The decreased payment standard from the schedule effective two years prior will be used, unless the PHA subsequently increased the payment standard. In that case, the current, increased payment standard will be used. In all cases, the PHA will provide the family with a minimum of 12 months' notice prior to applying a decreased payment standard. The notice will include the new payment standard amount, explain that the family's new payment standard amount will be the greater of the amount listed in the current written notice or the new amount (if any) on the PHA's payment standard schedule at the end of the 12-month period, and make clear where the family will find the PHA's payment standard schedule

	HUD Changes	PHA Changes
Chapter 7: Verification *New HOTMA Regulations: See Attached Chapter 7 for red-lined details of the HUD and PHA Changes*		
7-I.A. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 982.516, 982.551, 24 CFR 5.230; Notice PIH 2023-27; and HOTMAquestions@HUD.gov response 9/15/25] **Consent Forms**		**PHA Policy Change:** At admission, the PHA will request that all adult family members (other than the head of household) sign consent forms stating that their EIV income information may be shared with the head of household. Adult family members with no such consent form on file will be requested to sign at annual reexamination. If an adult family member other than the head of household fails to sign a consent form stating that their EIV income information may be shared with the head of household, the PHA will utilize EIV's "Print Household Member Information" feature to generate income reports addressed separately to each adult in the household. For example, if a household has two adults, the PHA will provide one report to the head of household and a separate report to the other adult member. Refusal by an adult family member to sign a form granting permission to provide EIV information to the head of household is not grounds for denial or termination of assistance of either the individual or the family. The executed form will remain effective until the family is denied assistance, the individual leaves the program, or the family member provides written notification to the PHA to revoke consent.

	HUD Changes	PHA Changes
Form HUD-9886-A, Authorization for Release of Information [24 CFR 5.230(b)(1), (b)(2), (c)(4), and (c)(5)]; Notice PIH 2023-27	**HUD Policy Clarification/Change:** All adult family members (and the head and spouse/cohead, regardless of age) are required to sign the Form HUD-9886-A at admission. Prior to January 1, 2024, participants signed and submitted Form HUD-9886 at each annual reexamination. HOTMA eliminated this requirement. On or after January 1, 2024, current program participants signed and submitted a Form HUD-9886-A. This form is only be signed once	

7-I.B. USE OF OTHER PROGRAMS' INCOME DETERMINATIONS **[24 CFR 5.609(c)(3) and Notice PIH 2023-27]**	**HUD Policy Change:** PHAs may, but are not required to, determine a family's annual income, including income from assets, prior to the application of any deductions, based on income determinations made within the previous 12-month period, using income determinations from means-tested federal public assistance programs. If the PHA adopts a policy to accept this type of verification, the PHA must include in policy when they will accept Safe Harbor income determinations and from which programs. PHAs must also create policies that outline the course of action when families present multiple verifications from the same or different acceptable Safe Harbor programs. Means-tested federal public assistance programs include: • Temporary Assistance for Needy Families (TANF) (42 U.S.C. 601, et seq.); • Medicaid (42 U.S.C. 1396 et seq.); • Supplemental Nutrition Assistance Program (SNAP) (42 U.S.C. 2011 et seq.); • Earned Income Tax Credit (EITC) (26 U.S.C. 32); • Low-Income Housing Tax Credit (LIHTC) program (26 U.S.C. 42); • Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) (42 U.S.C. 1786); • Supplemental Security Income (SSI) (42 U.S.C. 1381 et seq.); • Other programs administered by the HUD Secretary; • Other means-tested forms of federal public assistance for which HUD has established a memorandum of understanding; and • Other federal benefit determinations made in other forms of means-tested federal public assistance that the Secretary determines to have comparable reliability and announces through the *Federal Register.* If the PHA elects to use the annual income determination from one of the above-listed forms of means-tested federal public assistance, then they must obtain the income information by means of a third-party verification. The third-party verification must state the family size, must be for the entire family, and must state the amount of the family's annual income. The annual income need not be broken down by family member or income type. Annual income includes income earned from assets, therefore when using Safe Harbor to verify a family's	**PHA Policy Change:** The PHA will not accept verification from other federal assistance programs. With the exception of when the PHA uses streamlined income determinations at annual reexamination as described below, all income will be verified in accordance with the requirements of HUD's verification hierarchy and PHA policies in this chapter.

	HUD Changes	PHA Changes
	income, PHAs will neither further inquire about a family's net family assets, nor about the income earned from those assets, except with respect to whether or not the family owns assets that exceed the asset limitation in 24 CFR 5.618. The Safe Harbor documentation will be considered acceptable if any of the following dates fall into the 12-month period prior to the receipt of the documentation by the PHA: • Income determination effective date; • Program administrator's signature date; • Family's signature date; • Report effective date; or • Other report-specific dates that verify the income determination date. The only information that PHAs are permitted to use to determine income under this method is the total income determination made by the federal means-tested program administrator. Other federal programs may provide additional information about income inclusions and exclusions in their award letters; however, these determinations and any other information must not be considered by the PHA. PHAs are not permitted to mix and match Safe Harbor income determinations and other income verifications. If the PHA is unable to obtain Safe Harbor documentation or if the family disputes the other program's income determination, the PHA must calculate the family's annual income using traditional methods as outlined in Notice PIH 2023-27 and this chapter. If the PHA uses a Safe Harbor determination to determine the family's income, the family is obligated to report changes in income that meet the PHA's reporting requirement and occur after the effective date of the transaction. The amounts of unreimbursed reasonable attendant care expenses and childcare expenses deducted from a family's annual income, except for when a family is approved for a childcare expense hardship exemption, must still be capped by the amount earned by any family member who is enabled to work as a result of the expense. PHAs are therefore required to obtain third-party verification of the applicable employment income and cap the respective expense deductions accordingly.	

	HUD Changes	PHA Changes
7-I.C. STREAMLINED INCOME DETERMINATIONS [24 CFR 960.257(c); Notice PIH 2023-27]	**HUD Policy Change:** 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 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. 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. Two streamlining options are available, depending upon the percentage of the family's income that is received from fixed sources. 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. When less than 90 percent of a family's unadjusted income consists of fixed income, PHAs may apply a COLA to each of the family's sources of fixed income. PHAs must determine all other income using standard verification requirements as outlined in Notice PIH 2023-27.	**PHA Policy:** The PHA will not use streamlined income determination

7-I.D. VERIFICATION HIERARCHY [Notice PIH 2023-27]	When the PHA does not use a streamlined determination of income or an income determination from a means-tested federal assistance program, HUD requires the PHA to obtain third-party verification of: • Reported family annual income; • The value of net family assets when the net value exceeds the HUD-published threshold, as listed in HUD's Inflation-Adjusted Values; • Expenses related to deductions from annual income; and • Other factors that affect the determination of adjusted income. HUD mandates the use of the EIV system and offers administrative guidance on the use of other methods to verify family information and specifies the circumstances in which each method will be used. In general HUD requires the PHA to use the most reliable form of verification that is available and to document the reasons when the PHA uses a lesser form of verification. HUD developed a hierarchy that described verification documentation from most acceptable to least acceptable. The PHA must demonstrate efforts to obtain third party verification prior to accepting self-certification except instances when self-certification is explicitly allowed. In order of priority, the hierarchy is: • Highest: Level 6: Up-front Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system • Highest: Level 5: Up-front Income Verification (UIV) using a non-EIV system • High: Level 4: - Written third-party verification from the source, also known as "family-provided verification" - Or EIV plus self-certification • Medium: Level 3: Written third-party verification form • Medium: Level 2: Oral third-party verification • Low: Level 1: Self-certification (not third-party verification) Each of the verification methods is discussed in subsequent sections below. **File Documentation** The PHA must document in the file how the figures used in income and rent calculations were determined. All verification attempts, information obtained,	

	HUD Changes	PHA Changes
	and decisions reached during the verification process will be recorded in the family's file in sufficient detail to demonstrate that the PHA has followed all of the verification policies set forth in this plan. The record should be sufficient to enable a staff member or HUD reviewer to understand the process followed and conclusions reached	

7-I.E. LEVEL 5 AND 6 VERIFICATIONS: UP-FRONT INCOME VERIFICATION (UIV)	**HUD Policy Change:** Up-front income verification (UIV) refers to the PHA's use of the verification tools available from independent sources that maintain computerized information about earnings and benefits for a number of individuals. PHAs may use UIV sources before or during a family reexamination. UIV will be used to the extent that these systems are available to the PHA. There may be legitimate differences between the information provided by the family and UIV-generated information. If the family disputes the accuracy of UIV data, no adverse action can be taken until the PHA has independently verified the UIV information and the family has been granted an opportunity to contest any adverse findings through the informal review/hearing process of the PHA. HUD's Enterprise Income Verification (EIV) System (Mandatory) PHAs must use HUD's EIV system in its entirety as a third-party source to verify tenant employment and income information during annual and streamlined reexaminations of family composition and income in accordance with 24 CFR 5.236 and Notice PIH 2023-27. HUD's EIV system contains data showing earned income, unemployment benefits, social security benefits, and SSI benefits for participant families. The income validation tool (IVT) in EIV provides projections of discrepant income for wages, unemployment compensation, and SSA benefits pursuant to HUD's data sharing agreements with other departments. The following policies apply to the use of HUD's EIV system. EIV Income Report PHAs are required to obtain an EIV Income Report for each family any time the PHA conducts an annual reexamination. However, PHAs are not required to use the EIV Income Report: • At annual reexamination if the PHA used Safe Harbor verification from another means-tested federal assistance program to determine the family's income; or • During any interim reexaminations. The EIV Income Report is also not available for program applicants at admission. When required to use the EIV Income Report, the PHA must pull the report within 120 days of the effective date of the annual reexamination in order for the report to be considered current.	**PHA Policy Change:** The PHA will obtain an EIV Income Report for all annual reexaminations for families as part of the regular reexamination process. The PHA will ensure that all EIV Income Reports are pulled within 120 days of the effective date of the annual reexamination. Income reports will only be used for interim reexaminations as necessary. For example, EIV may be used to verify that families claiming zero income are not receiving income from any sources listed in EIV. Income reports will be retained in participant files with the applicable annual reexamination documents or interim reexamination documents (if applicable) for the duration of the family's participation. When the PHA determines through EIV reports and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 14, Program Integrity.

	HUD Changes	PHA Changes
	The EIV Income Report may be used to verify and calculate income at annual reexamination if the family self-certifies that the amount is accurate and representative of current income. The family must be provided with the information in EIV.	
New Hires Report [Notice PIH 2023-27]	**HUD Policy Change:** The New Hires Report identifies participant families who have new employment within the last six months. The report is updated monthly. PHAs must review this information at annual reexamination except when the PHA uses Safe Harbor verification from another means-tested federal assistance program to determine the family's income. PHAs that do not require families to undergo interim reexaminations for earned income increases after an interim decrease are not required to review this report between a family's annual reexamination. If the PHA requires an interim for increases in earned income after an interim decrease, then the PHA must review the report quarterly after the family's interim decrease.	**PHA Policy Changes:** In accordance with PHA policies in Chapter 11, the PHA processes an interim reexamination for families who have increases in earned income when there was a previous decrease. Except for instances in which the PHA uses Safe Harbor income determinations to determine a family's annual income, the PHA will review the report quarterly.
No Income Reported by HHS or SSA Report	**HUD Policy Change:** This report is a tool for PHAs to identify participants who passed the SSA identity test, but no income information was reported by either the Department of Health and Human Services (HHS) or SSA records. This scenario does not mean that the participant does not have any income. PHAs obtain written, third-party verification of any income reported by the participant. The PHA must identify in its policies and procedures when this report will be pulled [Notice PIH 2023-27].	**PHA Policy Changes:** The PHA will generate the No Income Reported by HHS or SSA Report quarterly and will retain the report. The PHA will re-verify the status of participants identified on the report quarterly. Based on the information provided by the family and in EIV, the PHA may require that family members provide verifications or sign release forms to allow the PHA to obtain additional verification. When the PHA determines through this report and third-party verification that a family has concealed or under-reported income, corrective action will be taken pursuant to the policies in Chapter 14, Program Integrity

	HUD Changes	PHA Changes
EIV Identity Verification Report	**HUD Policy Change:** The EIV system verifies tenant identities against SSA records. These records are compared to HUD data for a match on social security number, name, and date of birth. PHAs are required to use EIV's *Identity Verification Report* on a monthly basis to improve the availability of income information in EIV [Notice PIH 2023-27]. When identity verification for a participant fails, a message will be displayed within the EIV system, and no income information will be displayed.	**PHA Policy Changes:** The PHA will identify participants whose identity verification has failed by reviewing EIV's *Identity Verification Report* on a monthly basis. The PHA will attempt to resolve discrepancies by obtaining appropriate documentation from the participant. When the PHA determines that discrepancies exist as a result of PHA errors such as spelling errors or incorrect birth dates, it will correct the errors promptly.
Deceased Tenants Reports [Notice PIH 2012-4 and Notice PIH 2023-27]	**HUD Policy Change:** The Deceased Tenant Report identifies residents that have been reported by the SSA as deceased. The PHA is required to review the report at least monthly. When the Deceased Tenants Report identifies an individual as being deceased, or when PHA's receive information by other sources (e.g., reports from family or friends, presentation of an obituary). PHAs must request confirmation of the death within 24 hours of being notified of the death of a household member. The PHA must document in the tenant record their attempts to confirm the death. Requests for confirmation may be sent by mail, email, and/or hand delivery to the head of household. If the head of household is deceased and there are no other adult household members, the PHA should attempt to confirm the death with an emergency contact person. PHAs may provide families or emergency contacts 30 days to respond to the PHA's request for a written confirmation of death. If the family does not respond within 30 days, then the PHA may presume that the information is accurate and proceed in removing the deceased tenant from the household. In cases where the deceased individual is the head of household, the PHA must notify the owner in writing of the deceased head of household. For deceased single member households, PHAs must terminate the HAP to owner no later than the last day of the month in which the death occurred. After confirming the head of household's death, PHAs must submit a form HUD-50058 with an End of Participation (EOP) action as the last day of the month in which	**PHA Policy Changes:** If the deceased individual was the head of household and minors are the only remaining household members, the PHA will follow its policies regarding Caretakers for a Child in Section 6-I.B. When the only remaining household member is the live-in aide, the live-in aide is not entitled or eligible for any rental assistance or continued occupancy. The PHA may not designate the live-in aide as the new head of household or change the relation code on the Form HUD-50058.

	HUD Changes	PHA Changes
	the death occurred. The landlord is entitled to receive the full HAP amount for the month in which the tenant death occurred. If the deceased individual was the head of household and there are remaining family members who are eligible adults, the PHA must follow its administrative policies to determine whether the family continues to receive assistance with a new head of household and designate who the new head of household will be.	
Other EIV Reports [Notice PIH 2023-27]	**HUD Policy Change:** The PHA is required to review the Multiple Subsidy Report at least quarterly and the Failed EIV Pre-Screening, Failed Verification (Failed SSA Identity Test), and the EIV Immigration reports at least monthly.	
Upfront Income Verification Using Non-HUD Systems	**HUD Policy Change:** In addition to mandatory use of the EIV system, HUD encourages PHAs to utilize other upfront verification sources	**PHA Policy Changes:** The PHA will inform all applicants and participants of its use of the following UIV resources: HUD's EIV system The Work Number (as necessary)
7-I.F. LEVEL 4 VERIFICATION [Notice PIH 2023-27]	**HUD Policy Change:** HUD identifies two types of Level 4 verification: written-third party verification from the source and EIV + self-certification. **EIV + Self-Certification** EIV may be used as written third-party verification and may be used to calculate income if the family agrees with the information in EIV and self-certifies that the amount is accurate and representative of current income. This practice is known as *EIV + self-certification*. When calculating income using this method, the PHA may use its discretion to determine which method of calculation is reasonable: the last four quarters combined or an average of any number of quarters. The family must be provided with the information from EIV.	**PHA Policy Changes:** At annual reexamination, if the PHA is unable to use a determination of income from a means-tested federal assistance program and if there are no reported changes to an income source, the PHA will use EIV + self-certification as verification of employment income, provided the family agrees with the amounts listed in EIV. The PHA will follow EIV security requirements as detailed in PHA policy in Section 7-I.A. Family Consent to Release of Information. If an adult family member other than the head of household fails to sign a consent form stating that their EIV income information may be shared

	HUD Changes	PHA Changes
		with the head of household, the PHA will utilize EIV's "Print Household Member Information" feature to generate income reports addressed separately to each adult in the household. For example, if a household has two adults, the PHA will provide one report to the head of household and a separate report to the other adult member. The PHA will use an average of the last two quarters of income listed in EIV to determine income from employment. The PHA will provide the adult family member with the information in EIV. The family member 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 member disagrees with using only the last two quarters of income listed in EIV, because of the seasonal or otherwise fluctuating nature of that family member's employment, the PHA will permit the family member 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 member 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 PHA will use written third-party verification from the source as outlined below. The PHA will not use this method of verification at new admission since EIV is not available for applicant families or at interim reexamination since the income information in EIV is not current.

	HUD Changes	PHA Changes
Written Third-Party Verification from Source	**HUD Policy Change:** Written, third-party verification from the source is also known as "tenant-provided verification." In order to qualify as written-third party verification from the source, the documents must be original or authentic and (generally) dated within 120 days of the date received by the PHA. For fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation. The PHA may use the verification obtained during an interim reexamination for an annual reexamination if there have been no other changes to annual income since the interim reexamination. Documents may be supplied by the family or received from a third-party source.	

	HUD Changes	PHA Changes
7-I.G. LEVEL 3 VERIFICATION: WRITTEN, THIRD-PARTY FORM [Notice PIH 2023 -27]	**HUD Policy Change:** This type of verification is a form developed by the PHA and used uniformly for all families when needed to collect information from a third-party source. This is known as "traditional third-party verification." PHAs send a PHA-developed form directly to the third-party source by mail, fax, or email and the source completes the form by hand (in writing or typeset). The PHA may use this method when higher forms are unavailable or are rejected by the PHA or when the family is unable to provide acceptable verification. The PHA may skip this level of verification and may instead substitute oral third-party verification before moving to self-certification.	**PHA Policy Change:** Typically, the PHA will attempt to send written third-party verification forms to the verification source whenever higher forms of verification are unavailable. However, on a case-by-case basis, the PHA may choose to obtain oral third-party verification without first attempting, and in lieu of, a written-third party verification form.
7.I.H. LEVEL 2: ORAL THIRD-PARTY VERIFICATION [Notice PIH 2023-27]	**HUD Policy Change:** For third-party oral verification, PHAs contact sources identified by UIV techniques or by the family, by telephone or in person. Third-party oral verification may be used when requests for written third-party verification forms have not been returned within a reasonable time—e.g., 10 business days. PHAs must document in the file the date and time of the telephone call or visit, the name of the person contacted, the telephone number, as well as the information confirmed. The PHA may skip this level of verification if they attempted written third-party verification via a form and the source did not respond and move directly to self-certification.	**PHA Policy Change:** In general, the PHA will attempt to obtain written third-party verification via a form from the verification source. If written third-party verification forms are not returned within 10 business days, the PHA will accept self-certification from the family without attempting to obtain oral third-party verification. However, if the PHA chooses to obtain oral third-party verification, the PHA will document in the file the date and time of the telephone call or visit, the name of the person contacted and the telephone number, as well as the information confirmed
When Third-Party Verification is Not Required [Notice PIH 2023-27]	**HUD Policy Change:** Third-party verification may not be available in all situations. HUD has acknowledged that it may not be cost-effective or reasonable to obtain third-party verification of income, assets, or expenses when these items would have a minimal impact on the family's total tenant payment.	**PHA Policy Change:** If the family cannot provide original documents, the PHA will pay the service charge required to obtain third-party verification, unless it is not cost effective in which case a self-certification will be acceptable as the only means of verification. The cost of verification will not be passed on to the family.

	HUD Changes	PHA Changes
		The cost of postage and envelopes to obtain third-party verification of income, assets, and expenses is not an unreasonable cost [VG, p. 18].
Primary Documents	**HUD Policy Change:** Third-party verification is not required when legal documents are the primary source, such as a birth certificate or other legal documentation of birth.	
Imputed Assets	**HUD Policy Change:** HUD permits PHAs to accept a self-certification from a family as verification of assets disposed of for less than fair market value [HCV GB, p. 5-28].	**PHA Policy Change:** The PHA will accept a self-certification from a family as verification of assets disposed of for less than fair market value.

<table>
<tr><th></th><th>HUD Changes</th><th>PHA Changes</th></tr>
<tr><td>7-I.I. LEVEL 1: NON-THIRD-PARTY VERIFICATION: SELF-CERTIFICATION [Notice PIH 2023-27]</td><td>HUD Policy Change:
Non-third-party verification consists of a signed statement of reported income and/or expenses. This verification method should be used as a last resort when the PHA has not been successful in obtaining information via all other required verification techniques.
Self-certification, however, is an acceptable form of verification when:
A source of income is fully excluded
Net family assets are less than or equal to the HUD-published threshold and the PHA has adopted a policy to accept self certification
The family declares that they do not have any present ownership in any real property
A family reports zero income;
A family states that they have non-recurring income that will not be repeated in the coming year; and/or
The PHA has adopted a policy to implement streamlined verification for fixed sources of income (See Chapter 11)
When the PHA was required to obtain third-party verification but instead relies on self-certification, the family's file must be documented to explain why third-party verification was not available.
HUD does not require that a self-certification be notarized; however, HUD recommends including language on any self-certification to ensure the certifier understands the consequences of knowingly providing false information.</td><td><u>PHA Policy Change:</u>
When information cannot be verified by a third party or by review of documents, family members will be required to submit self-certifications attesting to the accuracy of the information they have provided to the PHA.

The PHA may require a family to certify that a family member does <u>not</u> receive a particular type of income or benefit.

The self-certification must be made in a format acceptable to the PHA and must be signed by the family member whose information or status is being verified.

All self-certifications will include the following language:

"I/We, the undersigned, certify under penalty of perjury that the information provided here is true and correct, to the best of my knowledge and recollection. WARNING: Anyone who knowingly submits a false claim or knowingly makes a false statement is subject to criminal and/or civil penalties, including confinement for up to five years, fines, and civil and administrative penalties (18 U.S.C. 287, 1001, 1010, 1012; 31 U.S.C. 3279, 3802)."</td></tr>
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	HUD Changes	PHA Changes
7-II.A. VERIFICATION OF LEGAL IDENTITY		**PHA Policy Change:** Added Certified school records to verify legal identity for Children Added Language: Legal identity will be verified for all applicants at the time of eligibility determination *and in cases where the PHA has reason to doubt the identity of a person representing themselves to be a participant.*
7-II.G. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5.508]		
U.S. Citizens and Nationals	**Added HUD Language:** HUD strongly encourages PHAs to require that families provide proof of citizenship by such means as birth certificates, naturalization certificates, passports, or other documentation [HUD Secretary Letter 12/16/25].	**PHA Policy—Removed "or there is a change in a family member's citizenship status" from below paragraph:** **Family members who claim U.S. citizenship or national status will not be required to provide additional documentation unless the PHA receives information indicating that an individual's declaration may not be accurate.**
Eligible Immigrants ***PHA Verification*** [HCV GB, pp. 5-3 and 5-7; HUD Secretary Letter 12/16/25	**Added HUD Language:** For family members under the age of 62 who claim to be eligible immigrants must provide supporting documentation of their immigration status and sign a verification consent form. Supporting documentation consists of documentation accepted by the U.S. Citizenship and Immigration Services (USCIS)—for example, a Form I-551 U.S. Permanent Resident Card. The PHA must verify immigration status with the United States Citizenship and Immigration Services (USCIS). The PHA will follow all USCIS protocols for verification of eligible immigration status. The primary method for verifying eligible immigration status is USCIS's automated system, Systematic Alien Verification for Entitlements (SAVE). The PHA must determine whether the applicant's status makes them eligible for assistance consistent with Section 214. Exhibit 7-2 at the end of this chapter provides information on eligibility for HUD assistance.	

	HUD Changes	PHA Changes
	Where applicable, the PHA must retain documentation of SAVE verification in tenant files. If SAVE cannot confirm an individual's eligible immigration status, or if the response in SAVE verifies an immigration status that is not eligible for assistance, then the PHA must submit a request for secondary or additional verification to USCIS within 10 days of receiving the initial results. The PHA must scan and upload information to USCIS as needed or required to obtain a verification response. If the secondary or additional verification fails, the PHA must notify the family and inform them of their right to file an appeal with USCIS. If the family wishes to exercise their right to file an appeal with USCIS, they must submit a written request to USCIS within 30 days of the notification. USCIS will render a decision to the family and forward a copy to the PHA. Assistance must be denied when primary and secondary verification do not verify eligible immigration status and the family does not pursue a USCIS appeal or informal hearing rights, or decisions are rendered against the family through a USCIS appeal or informal hearing. The PHA must not delay, deny, reduce, or terminate assistance because of a delay in the process of determining eligible status, unless the family causes the delay. While the PHA may not admit any individual prior to receiving required documentation, the PHA may elect to provide prorated assistance to the family prior to completing the verification process. Family members who do not sign a declaration of their status or provide the required supporting documentation will be considered ineligible for housing assistance. The head of household must sign a statement listing all family members who do not claim to be citizens, nationals, or eligible immigrants, or whose status cannot be confirmed [HUD Secretary Letter 12/16/25].	

	HUD Changes	PHA Changes
7-III.B. BUSINESS AND SELF EMPLOYMENT INCOME	**HUD Policy Change:** The PHA must obtain written, third-party verification when the income type is not available in EIV. This includes income from self-employment.	**Added language to PHA Policy:** Business owners and self-employed persons will be required to provide: Income tax returns with corresponding official tax forms and schedules attached and including third-party receipt of transmission for income tax return filed (i.e., tax preparer's transmittal receipt, summary of transmittal from online source, etc.). For self-employed individuals who claim they do not have to file tax returns, The PHA will obtain a completed copy of IRS Form 4506-T to verify that no return has been filed. For those employed in "gig employment" (i.e., those in formal agreements with on-demand companies such as Uber, Lyft, or DoorDash), the PHA will provide a format for the individual to declare their income and expenses. The PHA will also review the printed statement of monthly income from the applicable app for all hours worked and pay received as well as the Schedule C of the individual's tax return and the corresponding IRS Form 1099 or 1099k.
7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS		
Social Security/SSI Benefits [Notice PIH 2023-27]	**HUD Policy Change:** Verification requirements for Social Security (SS) and Supplemental Security Income (SSI) benefits differ for applicants and participants. For applicants, since EIV does not contain SS or SSI benefit information, the PHA must ask applicants to provide a copy of their current SS and/or SSI benefit letter (dated within the appropriate benefit year) for each family member that receives SS and/or SSI benefits. If the family is unable to provide the document or documents, the PHA should help the applicant request a benefit verification letter from SSA's website at www.ssa.gov or ask the family to request one by calling SSA at 1-800-772-1213. The PHA must obtain the original benefit letter	**PHA Policy Change**: If an EIV income report must be provided to the family, the PHA will follow EIV security requirements as detailed in PHA policy in Section 7-I.A. Family Consent to Release of Information

	HUD Changes	PHA Changes
	from the applicant, make a photocopy of the document for the file, and return the original to the family. For participants, the PHA must obtain information through the HUD EIV system and confirm with the participants that the current listed benefit amount is correct. • If the participant agrees with the amount reported in EIV, the PHA must use the EIV-reported gross benefit amount to calculate annual income from Social Security. PHAs are required to use the EIV-reported SS and SSI benefit amounts when calculating income unless the tenant disputes the EIV-reported amount. For example, an SSA benefit letter may list the monthly benefit amount as $450.80 and EIV displays the amount as $450.00. The PHA must use the EIV-reported amount unless the participant disputes the amount. • If the participant disputes the EIV-reported benefit amount, or if benefit information is not available in EIV, the PHA must request a current SSA benefit verification letter (dated within the appropriate benefit year) from each family member that receives SS and/or SSI benefits. If the family is unable to provide the document or documents, the PHA should help the participant request a benefit verification letter from SSA's website at www.ssa.gov or ask the family to request one by calling SSA at 1-800-772-1213. The PHA must obtain the original benefit letter from the participant, make a photocopy of the document for the file, and return the original to the family. Photocopies of social security checks or bank statements are not acceptable forms of verification for SS/SSI benefits.	

	HUD Changes	PHA Changes
7-III.D. ALIMONY OR CHILD SUPPORT [Notice PIH 2023-27]	**HUD Policy Change:** Annual income includes "all amounts received," not the amount that a family may be legally entitled to receive but which they do not receive. For example, a family's child support or alimony income must be based on payments received, not the amounts to which the family is entitled by court or agency orders. A copy of a court order or other written payment agreement alone may not be sufficient verification of amounts received by a family.	**PHA Policy Change:** Verification will be obtained in the following order of priority: Copies of the receipts and/or payment stubs for the 90 day period prior to PHA request Third-party verification form from the state or local child support enforcement agency Third-party verification form from the person paying the support Family's self-certification of amount received Note: Families are not required to undertake independent enforcement action.
7-III.E. NONRECURRING INCOME [Notice PIH 2023-27]	**HUD Policy Change:** 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. PHAs may accept a self-certification from the family stating that the income will not be repeated in the coming year.	**PHA Policy Change:** The PHA will accept self-certification from the family stating that income will not be repeated in the coming year. However, the PHA may choose, on a case-by-case basis, to require third-party verification that income sources will not be repeated in the coming year.
7-III.F. ASSETS AND INCOME FROM ASSETS		
Net Family Assets [24 CFR 5.603]	**HUD Policy Change:** At admission and reexam, for families with net assets less than or equal to the HUD-published threshold listed in HUD's current year Inflation-Adjusted Values tables ($54,898 for 2027), the PHA may, but is not required to, accept the family's self-certification that the family's assets do not exceed the HUD-published threshold without taking any additional steps to verify the accuracy of the declaration. The declaration must include the amount of income the family expects to receive from assets which must be included in the family's income. This includes declaring income from checking and savings accounts which, although these may be excluded from the calculation of net family assets (because the combined value of non-necessary personal property does not	**PHA Policy Change:** The PHA will not accept the family's self-certification of the value of family assets and anticipated asset income. The family will be required to provide third-party verification of net family assets every year. If the family declares that they do not hold any assets, they will be asked to sign a self-certification stating that they have under the HUD-published threshold amount (adjusted

	HUD Changes	PHA Changes
	exceed the HUD-published threshold), may generate asset income. PHAs must clarify during the self-certification process which assets are included/excluded from net family assets. For PHAs that choose to accept self-certification, the PHA is required to obtain third-party verification of all assets, regardless of the amount, at least once every three years. PHAs who choose not to accept self-certifications of assets must verify all families' assets on an annual basis. When net family assets have a total net value over the HUD-published threshold, the PHA may not rely on the family's self-certification. Third-party verification of assets is required when net family assets exceed the HUD-published threshold. When verification of assets is required, PHAs are required to obtain a minimum of one statement that reflects the current balance of banking/financial accounts	annually and published in HUD's current year Inflation-Adjusted Values tables) In determining the value of checking or savings accounts, the PHA will use the current balance. In determining the anticipated income from an interest-bearing checking or savings account when verification is required and the rate of return is known, the PHA will multiply the current balance of the account by the current rate of interest paid on the account. If a checking account does not bear interest, the anticipated income from the account is zero**.**
Self-Certification of Real Property Ownership [24 CFR 5.618(b)(2); Notice PIH 2023-27]	**HUD Policy Change:** The PHA must determine whether a family has present ownership in real property that is suitable for occupancy for purposes of determining whether the family is compliant with the asset limitation described in Chapters 3. The PHA may accept a self-certification from the family stating that the family does not have any present ownership in any real property. If the family certifies that they do not have any present ownership interest in real property, the PHA may take that as sufficient to determine the family is not out of compliance with the real property restriction. If the family declares they have present ownership in real property, the PHA must obtain third-party verification of the family's legal right to reside in the property, the effective legal authority to sell the property, and whether the property is suitable for occupancy by the family as a residence.	**PHA Policy Change:** The PHA will accept self-certification from the family stating that the family does not have any present ownership in any real property. The certification must be signed by all family members 18 years of age and older. The PHA reserves the right to require additional verification in situations where the accuracy of the declaration is in question. If the family declares they have present ownership in real property, the PHA will obtain third-party verification of the following factors: whether the family has the legal right to reside in the property; whether the family has effective legal authority to sell the property; and whether the property is suitable for occupancy by the family as a residence. However, in cases where a family member is a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, the PHA will comply with

	HUD Changes	PHA Changes
		confidentiality requirements under 24 CFR 5.2007 and will accept a self-certification.
7-III.H. FEDERAL TAX REFUNDS OR REFUNDABLE TAX CREDITS **[Notice PIH 2023-27]**	**HUD Policy Change:** PHAs are not required to verify the amount of the family's federal tax refund or refundable tax credit(s) if the family's net assets are less than or equal to the HUD-published threshold listed in HUD's current year Inflation-Adjusted Values tables ($50,000 for 2024, $51,600 for 2025), even in years when full verification of assets is required or if the PHA does not accept self-certification of assets. PHAs must verify the amount of the family's federal tax refund or refundable tax credits if the family's net assets are greater than the HUD-published threshold.	

	HUD Changes	PHA Changes
7-III.I. RETIREMENT ACCOUNTS		**PHA Policy Change:** The PHA will accept an original document from the entity holding the account dated no earlier than 12 months before that reflects any distributions of the account balance, any lump sums taken, and any regular payments
7-III.K. ZERO INCOME FAMILIES [Notice PIH 2023-27]	**HUD Policy Change:** PHAs have discretion to establish reasonable procedures to manage the risk of unreported income, such as asking families to complete a zero-income worksheet at admission or periodically after admission to determine if they have any sources of unreported income or searching any UIV sources for unreported income. In calculating annual income, PHAs must not assign monetary value to nonmonetary in-kind donations from a food bank or similar organization received by the family [24 CFR § 5.609(b)(24)(vi)]. PHAs may accept a self-certification of zero income from the family without taking any additional steps to verify zero reported income. HUD does not require such self-certifications be notarized. PHAs that perform zero income reviews must update local discretionary policies, procedures, and forms. Families who begin receiving income which does not trigger an interim reexamination should no longer be considered zero income even though the family's income is not reflected on the Form HUD-50058.	**PHA Policy Change:** The PHA may check UIV sources and/or request information from third-party sources to verify that certain forms of income such as unemployment benefits, TANF, SS, SSI, and earned income, child support, etc., are not being received by families claiming to have zero annual income. The PHA may also require that each family member who claims zero income status complete a zero-income form. If any sources of income are identified on the form, the PHA will verify the income in accordance with the policies in this chapter prior to including the income in the family's annual income. The PHA will only conduct interims in accordance with PHA policy in Chapter 11.
7-III.L. STUDENT FINANCIAL ASSISTANCE	**HUD Language Added:** …The PHA will not request verification of actual covered costs when the student's only source of assistance falls under Title IV of the HEA.	

7-IV.B. HEALTH AND MEDICAL CARE EXPENSE DEDUCTION	**HUD Policy Change:** Policies related to health and medical care expenses are found in Chapter 6. The amount of the deduction will be verified following the standard verification procedures described in Part I. The PHA must comply with the Health Insurance Portability and Accountability Act (HIPAA) (Pub. L. 104-191, 110 Stat. 1936) and the Privacy Act of 1974 (Pub. L. 93-579, 88 Stat. 1896) when requesting documentation to determine unreimbursed health and medical care expenses. The PHA may not request documentation beyond what is sufficient to determine anticipated health and medical care costs. Before placing bills and documentation in the tenant file, the PHA must redact all personally identifiable information [FR Notice 2/14/23].	***Amount of Expense*** **PHA Policy Change:** **Health and medical care expenses will be verified through:** Written third-party documents provided by the family, such as pharmacy printouts or receipts. When income is projected at new admission or interim, the PHA will make a best effort to determine what expenses from the past are likely to continue to occur in the future. The PHA will also accept evidence of monthly payments or total payments that will be due for health and medical expenses during the upcoming 12 months. Written third-party verification forms if the family is unable to provide acceptable documentation. When income is projected at new admission or interim, if third-party or document review is not possible, written family certification as to costs anticipated to be incurred during the upcoming 12 months. Before placing bills and documentation in the tenant file, the PHA will redact all personally identifiable information. If the PHA receives documentation from a verification source that contains the individual's specific diagnosis, information regarding the individual's treatment, and/or information regarding the nature or severity of the person's disability, the PHA will immediately dispose of this confidential information; this information will never be maintained in the individual's file. If the information needs to be disposed of, the

	HUD Changes	PHA Changes
		PHA will note in the individual's file that verification was received, the date received, and the name and address of the person/organization that provided the verification. *Under no circumstances will PHA include an applicant's or resident's medical records in the file [Notice PIH 2010-26].*
Expenses Incurred in Past Years		***PHA Policy Added*** ***"At new admission and interim reexam"*** *for when, the PHA will verify anticipated costs related to on-going payment of medical bills incurred in past years**.***
7-IV.C. DISABILITY ASSISTANCE EXPENSES	**HUD Policy Change—Added Language:** The PHA must comply with the Health Insurance Portability and Accountability Act (HIPAA) (Pub. L. 104-191, 110 Stat. 1936) and the Privacy Act of 1974 (Pub. L. 93-579, 88 Stat. 1896) when requesting documentation to determine unreimbursed auxiliary apparatus or attendance care costs. The PHA may not request documentation beyond what is sufficient to determine anticipated reasonable attendant care and auxiliary apparatus costs. Before placing bills and documentation in the tenant file, the PHA must redact all personally identifiable information [FR Notice 2/14/23].	
Amount of Expense		***PHA Policy Change:*** Expenses for attendant care will be verified through • Written third-party documents provided by the family, such as receipts or cancelled checks. • Third-party verification form signed by the provider, if family-provided documents are not available. When income is projected at new admission or interim, if third-party verification is not possible, written family certification as to costs anticipated to be incurred for the upcoming 12 months.

	HUD Changes	PHA Changes
		Before placing bills and documentation in the tenant file, the PHA will redact all personally identifiable information .If the PHA receives documentation from a verification source that contains the individual's specific diagnosis, information regarding the individual's treatment, and/or information regarding the nature or severity of the person's disability, the PHA will immediately dispose of this confidential information; this information will never be maintained in the individual's file. If the information needs to disposed of, the PHA will note in the individual's file that verification was received, the date received, and the name and address of the person/organization that provided the verification. Under no circumstances will PHA include an applicant's or resident's medical records in the file [Notice PIH 2010-26].
Auxiliary Apparatus		**PHA Policy Added the following:** "If third-party verification is not possible, written family certification of estimated apparatus costs for the upcoming 12 months".
Chapter 8: National Standards for Physical Inspections		
HAP Abatement [24 CFR 982.404(d)(2)]		**PHA Policy**: Payment will resume effective on the following business day the unit passes inspection vs the same day the unit passes. The PHA will make all HAP abatements effective the first of the month following the expiration of the PHA-specified correction period (including any extension).

	HUD Changes	PHA Changes
		The PHA will inspect abated units within five business days of the owner's notification that the work has been completed. Payment will resume effective on the following business day the unit passes inspection.
Chapter 9: General Leasing Policies		
9-I.E. PHA LEASING ASSISTANCE FOR FAMILIES	**HUD NEW Language:** PHAs may utilize their Unrestricted Net Position (UNP, or administrative fee reserves) or ongoing administrative fees towards activities designed to help assist HCV families in leasing units under the program. Such activities include providing security deposit assistance, utility deposit assistance, assisting with all or some of the application fee or similar fees, and holding fees.	**PHA Policy:**--The PHA will not utilize UNP or ongoing administrative fees to pay security deposits, utility deposits, assist with application or similar fees, or holding fees.
9-I.F. LEASE AND TENANCY ADDENDUM		**PHA Policy—Added when a shorter lease than 1 year would be approved:** The PHA will approve an initial lease term of less than one (1) year only where the PHA determines and can clearly document that: (i) Such shorter term would improve housing opportunities for the tenant; and (ii) Such shorter term is the prevailing local market practice.
9-I.H. HAP CONTRACT EXECUTION [24 CFR 982.305]		**PHA Policy:**--Added clarifying language about the HAP Contract matching the dwelling lease term. • The owner and the assisted family will execute the dwelling lease and the owner must provide a copy to the PHA. • The owner and the PHA will execute the HAP contract. The HAP Contract begins the first day of the lease term and ends the last day of the lease term. The PHA will not execute the HAP contract until the owner has submitted IRS form W-9. The PHA will ensure that the owner receives a copy of the executed HAP contract.

	HUD Changes	PHA Changes
		• As required under VAWA, once the HAP contract and lease have been executed and the family has been admitted to the program, the PHA will notify the families of their rights under VAWA by providing all families with a copy of the domestic violence certification form (HUD-5382) as well as the VAWA notice of occupancy rights (form HUD-5380).
Chapter 11: Reexaminations *New HOTMA Regulations: See Attached Chapter 7 for red-lined details of the HUD and PHA Changes*		
Introduction	**HUD Added the following Category of Reexam:** Part III: Non-Interim Reexamination Transaction. This part describes transactions that do not entail changes to the family's adjusted income.	
11-I.A. OVERVIEW	**HUD Added Overview Language Explaining new way to perform Reexams:** Unlike when performing an interim reexamination or at intake, at annual reexamination, the PHA must determine the income of the family for the previous 12-month period, except where the PHA uses a streamlined income determination. Income from assets, however, is always anticipated, irrespective of the income examination type [Notice PIH 2023-27]. PHAs also have the option of using a Safe Harbor income verification from another federal means-tested program to verify gross annual income. Chapter 7 contains the PHA's policies related to streamlined income determinations and the use of Safe Harbor income verifications.	
11-I.E. CALCULATING ANNUAL INCOME AT ANNUAL REEXAMINATION [24 CFR 5.609(c)(2) and Notice PIH 2023-27]	**HUD Policy Change:** The PHA must determine the income of the family for the previous 12-month period and use this amount as the family income for annual reexaminations, except where the PHA uses a streamlined income determination as indicated in Chapter 7 of this policy. The PHA may also use Safe Harbor income determinations dated within the last 12 months from a means-tested federal public assistance program at annual reexamination as outlined in Chapter 7 of this policy.	**PHA Policy** The PHA will not use streamlined income determinations. Regardless of the percent of a family's unadjusted income from fixed income sources: The PHA will streamline the annual reexamination process by applying the verified

	HUD Changes	PHA Changes
	Except when using streamlined or Safe Harbor income determinations, in determining the income of the family for the previous 12-month period, any change of income since the family's last annual reexamination, including those that did not meet the threshold to process an interim reexamination in accordance with PHA policies and 24 CFR 5.657(c) or 960.257(b) must be considered. Income from assets is always anticipated, irrespective of the income examination type. A change in income may be a loss of income or the addition of a new source of income. Changing to a different employer in the prior year does not necessarily constitute a change if the income earned from either employer is substantially the same. The PHA should look at the entirety of the family's unearned income and earned income from the prior year in which earned income may have been one constant job or many different jobs that start and stop. Cost of Living Adjustments (COLA) to Social Security income and Social Security disability income are always considered changes to income because the COLA is an adjustment that automatically occurs annually by law. See Chapter 6 for PHA policies on when the COLA is applied and Chapter 7 on streamlined determination of income for inflationary adjustments. Notice PIH 2023-27 lists the following steps to calculate both earned and unearned income at annual reexamination. **Step 1: The PHA determines annual income for the previous 12-month period by reviewing the following information:** • The EIV Income Report pulled within 120 days of the effective date of the annual reexamination; • The income reported on the most recent HUD–50058; and • The amount of prior-year income reported by the family on the PHA's annual reexamination paperwork. **Step 2: The PHA takes into consideration any interim reexamination of family income completed since the last annual reexamination.** • If there was an interim reexamination performed within the last reexamination cycle and there are no additional changes, the PHA must	COLA/inflationary adjustment factor to fixed-income sources such as Social Security. The family will be required to list their sources of fixed income by listing them on their annual reexam. If the family's source(s) of fixed income has changed from the previous year, the PHA will obtain third-party verification of any new sources of fixed income.

	HUD Changes	PHA Changes
	use the annual income from the interim to determine the family's total annual income. The PHA may use verification obtained from the interim for this step. • If the PHA did not perform an interim or there have been changes since the last reexamination, the PHA moves to Step 3. **Step 3: If there were changes in annual income not processed by the PHA since the last reexamination, the PHA must use current income. The family will be required to report their income for the prior year and whether there have been permanent changes.** If there are no reported changes to an income source, the PHA may use documentation of prior-year income to calculate the annual income. For example, the PHA may use the following documentation: • EIV + self-certification (wages, Supplemental Security Income (SSI), Social Security, and unemployment) • Current written third-party verification from the source verifying prior-year income that is dated within 120 days of receipt by the PHA, for example: - Year-end statements - Paystub with year-to-date amounts - Tax forms (Form 1040, W2, 1099, etc.) If there are reported changes by the family or the PHA notes discrepancies between EIV and what the family reports, the PHA must follow the verification hierarchy (described in Chapter 7) to document and verify income. Exhibit 11-1 provides detailed examples of how the PHA calculates income from different sources at annual reexamination using the above method	
PART II: INTERIM REEXAMINATIONS [24 CFR 982.516] **11-II.A. OVERVIEW**	**HUD Added Language Explaining Interim Reexaminations:** A family may request an interim determination of family income or composition because of any changes since the last determination. The PHA must conduct any interim reexamination within a reasonable period of time after the family request or when the PHA becomes aware of a change in the family's adjusted income that must be processed in accordance with HUD regulations. What qualifies as a "reasonable time" may vary based on the amount of time it takes to verify information, but the PHA generally should conduct the interim	

	HUD Changes	PHA Changes
	reexamination not longer than 30 days after the PHA becomes aware of changes in income. Notice PIH 2023-27 changes the conditions under which interim reexaminations must be conducted, codifies when interim reexaminations should be processed and made effective, and requires related changes for annual reexaminations and streamlined income determinations. When the PHA determines that an interim reexamination of income is necessary, they must ask the family to report changes in all aspects of adjusted income and household composition. HUD recommends as a best practice that PHA's maintain documentation of all reported changes in the family's file, including those that did not result in an interim reexamination	
11-II.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION		
Reporting	**HUD Policy Change:** PHAs must require families to report household composition changes; however, PHAs determine the timeframe in which reporting happens [Notice PIH 2023-27]. The PHA must adopt policies prescribing when and under what conditions the family must report changes in income and family composition [24 CFR 960.257(b)(5)].	**PHA Policy**: All families must report all changes in family and household composition that occur between annual reexaminations within 10 business days of the change.
Conducting Interims [Notice PIH 2023-27]	**HUD Policy Change:** PHAs must conduct interim reexaminations when a household adds or removes household members, including family members, foster adults, foster children, and live-in aides. An interim reexamination is processed to add the new member regardless of whether the change results in a decrease, increase, or no change in the family's annual adjusted income. The exception to this policy is if, during the last three months of the family's recertification period, the family is adding or removing household members and the change would require an interim reexamination for an increase in the family's adjusted income, and the PHA has a written policy not to conduct interim reexaminations under these circumstances, then the PHA is not required to conduct an interim reexamination. If PHA policy allows for this, the PHA would instead include the change in household composition (and any related changes	**PHA Policy Change:** The PHA will conduct interims for all decreases related to household changes. PHA will not conduct an interim reexamination when a family has a change in family composition within three months of the annual reexamination effective date if it results in an increase. The PHA will add the new household member at the family's annual reexamination **PHA Policy Change**: When a household member is added who has earned income that would cause the household's

	HUD Changes	PHA Changes
	to income or allowances) at the family's next annual reexamination. A non-interim reexam transaction is not submitted in this case. Otherwise, interim reexaminations are always conducted for changes in household composition. Changes to the household's adjusted income are processed as follows: • When the addition or removal of a household member changes the deductions for which the family qualifies, the PHA processes the interim increase or decrease regardless of the amount of the change. • When a household member is added who has earned income that would cause the household's adjusted income to increase, the PHA must not consider increases in earned income, unless the family has previously received an interim reduction during the same reexamination cycle, and PHA policy allows for an interim reexamination in this circumstance. If the increase is not considered, then an interim reexamination is processed to add the new member, but their income is not added until the family's next annual reexamination. When a new household member is added who has both earned and unearned income, the PHA must not consider increases in earned income, unless the family has previously received an interim reduction during the same reexamination cycle, and PHA policy allows for an interim reexamination in this circumstance. For the unearned income, the PHA processes the interim increase regardless of the amount of the increase.	adjusted income to increase between annual reexaminations, the PHA will only conduct an interim reexamination adding that earned income if there was a previous decrease since the family's last annual reexamination. If there was not an interim reduction during the same reexamination cycle, the PHA will process an interim reexamination to add the new member, but their income will not be added until the family's next annual reexamination. When a new household member is added who has unearned income, the PHA must process an interim reexamination regardless of the amount of the increase.
Departure of a Family or Household Member	**HUD Policy Change:** Added that the PHA "must process an interim recertification anytime a family member permanently moves out of the unit"	
Changes in Family Unit Size (Voucher Size) [24 CFR 982.505(c)(6)]		**Added the following paragraph to the PHA Policy:** *For reference and audit purposes, for changes effective 12/2/24 and earlier: Irrespective of any increase or decrease in the payment standard, if the family unit size increased or decreased during the HAP contract term, HUD required the new family unit size to be*

	HUD Changes	PHA Changes
		used to determine the payment standard for the family beginning at the family's first regular reexamination following the change in family unit size. ***PHA Policy*** If the family unit size (voucher size) changes during the term of a HAP contract, the new family unit size will be used to determine the payment standard at the family's first regular reexamination following the change in family unit size.
11-II.C. CHANGES AFFECTING INCOME OR EXPENSES	**HUD Language Changes:** Interim reexaminations for changes in income or expenses may be scheduled either because the PHA has reason to believe that changes in income or expenses may have occurred, or because the family reports a change. The PHA must estimate the income of the family for the upcoming 12-month period to determine family income for an interim reexamination [24 CFR 5.609(c)(1)]. Policies for projecting income are found in Chapter 6.	
Interim Decreases [24 CFR 982.516(c)(2) and Notice PIH 2023-27]	**HUD Policy Change:** A family may request an interim determination of family income for any change since the last determination. However, the PHA may decline to conduct an interim reexamination if the PHA estimates the family's adjusted income will decrease by an amount that is less than 10 percent of the family's adjusted income, with the exception of circumstances in which household members are added or removed, as discussed in Section 11-II.B. The PHA may set a lower threshold in PHA policy such as performing an interim for any decreases in adjusted income, although HUD prohibits the PHA from setting a dollar-figure threshold. The PHA must conduct an interim reexamination when a family's annual adjusted income has changed by an amount that the PHA estimates will result in a decrease of 10 percent or more in annual adjusted income. In addition to decreases in family income, increases in a family's deductions may produce a sufficient decrease in annual adjusted income to require an interim reexamination.	**PHA Policy Changes:** The PHA will conduct an interim reexamination any time the family's adjusted income has decreased by any amount.

	HUD Changes	PHA Changes
Interim Increases [24 CFR 982.516(c)(3) and Notice PIH 2023-27]	**HUD Policy Changes related to Interim Increases:** **Increases Less than 10 Percent:** PHAs must not process interim reexaminations for income increases that result in less than a 10 percent increase in annual adjusted income. **Increases 10 Percent or Greater** PHAs must conduct an interim reexamination of family income when the PHA becomes aware that the family's adjusted income has changed by an amount that the PHA estimates will result in an increase of 10 percent or more in adjusted income, with the following exceptions: • PHAs may not consider any increases in earned income when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction during the same reexamination cycle; and • PHAs may choose not to conduct an interim reexamination during the last three months of a certification period if a family reports an increase in income within three months of the next annual reexamination effective date. When the family previously received an interim reexamination for a decrease to adjusted income during the same annual reexamination cycle, a PHA has the discretion whether to consider a subsequent increase in earned income.	**PHA Policy Changes**: Provided a family's increase meets the 10 percent threshold, the PHA will conduct an interim when the family experiences an increase in earned income and the family previously had an interim performed for a decrease in adjusted income (whether for earned income, unearned income, or a combination of the two) since their last annual. The PHA will not process an interim for increases in earned income when an interim was previously performed since the family's last annual and the interim resulted in an increase in the family's rent, nor will the PHA process an interim for an increase in earned income when the family has not had a previous interim reexamination since their last annual. The PHA will also process an interim for any other increases in income that meet the 10 percent threshold. The PHA will not perform an interim reexamination when a family reports an increase in income (whether earned or unearned income) within three months of their annual reexamination effective date. However, families who delay reporting income increases until the last three months of their certification period may be subject to retroactive rent increases in accordance with the PHA policies in Chapter 15.
Concurrent Increases in Earned and Unearned Income [Notice PIH 2023-27]	**HUD Policy Change** : When the family reports an increase in both earned and unearned income at the same time, the PHA must look at the earned and unearned income changes independently of each other to determine if an interim reexamination is performed. The PHA will only conduct an interim reexamination when the	

	HUD Changes	PHA Changes
	increase independently meets the 10 percent threshold and all other requirements for performing interim reexaminations. For example, if a family reported increases in both earned and unearned income that overall resulted in a 12 percent increase in their adjusted income, but the change in earned income represented a 7 percent increase and the change in unearned income represented a 5 percent increase, the PHA may not perform an interim for either change since neither change meets the 10 percent threshold amount independently. If the change in unearned income met the 10 percent threshold in this case, the PHA would be required to perform an interim. If the change in earned income met the 10 percent threshold in this case, the PHA would refer to PHA policy to determine whether an interim was required.	
Cumulative Increases [Notice PIH 2023-27]	**HUD Policy Change:** A series of smaller reported increases in adjusted income may cumulatively meet or exceed the 10-percent increase threshold, at which point the PHA must conduct an interim reexamination in accordance with PHA policy.	
Family Reporting	**HUD Policy Change**: The PHA must adopt policies consistent with HUD regulations prescribing when and under what conditions the family must report a change in family income or composition [24 CFR 982.516(d)]. PHA policy may require families to report only changes that the family estimates meet the threshold for an interim reexamination or the PHA may establish policies requiring that families report all changes in income and household composition, and the PHA will subsequently determine if the change requires an interim reexamination [Notice PIH 2023-27]. When the PHA determines that an interim reexamination of income is necessary, they must ask the family to report changes in all aspects of adjusted income. For example, if the family is reporting a decrease in adjusted income that is more than 10 percent, but the family also had a change in assets that would result in a change in income, the change in assets must also be reviewed [Notice PIH 2023-27].	**PHA Policy Changes**: The family will be required to report all changes in income regardless of the amount of the change, whether the change is to earned or unearned income, or if the change occurs during the last three months of the certification period. Families must report changes in income within 10 business days of the date the change takes effect. The family may notify the PHA of changes either in writing including email or via web-based application system. If the family provides oral notice, the PHA will also require the family to submit the changes in writing, including email or via web-based application system. Within 10 business days of the family reporting the change, the PHA will determine whether the change will require an interim reexamination. If the change will not result in an interim reexamination, the PHA will note the information in the tenant file but will not conduct an interim

	HUD Changes	PHA Changes
		reexamination. The PHA will send the family written notification (which may be emailed) within 10 business days of making this determination informing the family that the PHA will not conduct an interim reexamination. If the change will result in an interim reexamination, the PHA will determine the documentation the family will be required to submit based on the type of change reported and PHA policies in Chapter 7. The PHA will ask the family to report changes in all aspects of adjusted income at this time. The family must submit any required information or documents within 10 business days of receiving a request from the PHA. This time frame may be extended for good cause with PHA approval. The PHA will accept required documentation by mail, email, or in person. The PHA will conduct the interim within a reasonable time period based on the amount of time it takes to verify the information. Generally, the family will not be required to attend an interview for an interim reexamination. However, if the PHA determines that an interview is warranted, the family may be required to attend.
11-II.D. Effective Dates	**HUD Policy Changes:** **Changes Reported Timely [Notice PIH 2023-27]** If the family reports a change in family income or composition timely in accordance with PHA policies: • For rent increases, the PHA must provide the family with 30 days advance written notice. The rent increase is effective the first of the month after the end of that 30-day notice period. • Rent decreases are effective on the first of the month after the date of the actual change leading to the interim reexamination of family income. This means the decrease will be applied retroactively.	**PHA Policy Change**: In general, when the family fails to report a change in income or family composition timely, and the change would lead to a rent decrease, the PHA will apply the decrease the first of the month following completion of the interim reexamination. However, the PHA will apply the results of the interim reexamination retroactively where a

	HUD Changes	PHA Changes
	Changes Not Reported Timely [Notice PIH 2023-27] If the family failed to report a change in family income or composition timely in accordance with PHA policies: • For rent increases, the PHA must implement any resulting rent increases retroactively to the first of the month following the date of the change leading to the interim reexamination of family income. • For rent decreases, the PHA must implement the change no later than the first rent period following completion of the interim reexamination. However, the PHA may choose to adopt a policy that would make the effective date of the rent decrease retroactive to the first of the month following completion of the reexamination. PHAs may choose to establish conditions or requirements for when such a retroactive application would apply. PHAs that choose to adopt such policies must ensure the earliest date that the retroactive decrease is applied is the later of: • The first of the month following the date of the change that led to the interim reexamination; or • The first of the month following the most recent previous income examination. In applying a retroactive change in rent as the result of an interim reexamination, the PHA must clearly communicate the effect of the retroactive adjustment to the family so that there is no confusion over the amount of the rent that is the family's responsibility.	family's ability to report a change in income promptly may have been hampered due to extenuating circumstances such as a natural disaster or disruptions to PHA management operations. The PHA will decide to apply decreases retroactively on a case-by-case basis. When the PHA applies the results of interim increases retroactively, the PHA will clearly communicate the effect of the retroactive adjustment to the family and may enter into a repayment agreement in accordance with PHA policies. The PHA will also clearly communicate the effect of the retroactive adjustment to the owner.
PART III: NON-INTERIM REEXAMINATION TRANSACTIONS [Notice PIH 2023-27]	**HUD Policy Change:** Families may experience changes within the household that do not trigger an interim reexamination under PHA policy and HUD regulations, but which HUD still requires the PHA to report to HUD via Form HUD-50058. These are known as non-interim reexamination transactions. In these cases, PHAs will submit a separate, new action code on Form HUD-50058. The following is a list of non-interim reexamination transactions: • Adding or removing a hardship exemption for the childcare expense deduction; • Updating or removing the phased-in hardship relief for the health and medical care expense deduction and/or reasonable attendant care and auxiliary apparatus expense deduction (families will begin receiving a	

	HUD Changes	PHA Changes
	24-month phased-in relief at their next annual or interim reexamination, whichever occurs first); • Adding or removing general hardship relief for the health and medical care expense deduction and/or reasonable attendant care and auxiliary apparatus expense deduction; • Adding or removing a minimum rent hardship; • Ending a family's EID or excluding 50 percent (decreased from 100 percent) of a family member's increase in employment income at the start of the second 12- month EID period. • Adding/updating a family or household member's Social Security number; • Updating a family member's citizenship status from eligible to ineligible or vice versa, resulting in a change to the family's rent and/or utility reimbursement, if applicable (i.e., family begins receiving prorated assistance or previously prorated assistance becomes full assistance), or updating the prorated rent calculation due to the addition or removal of family members in household with an ineligible noncitizen(s); and • Rent increases PHAs must make all other changes to assets, income, and deductions at the next annual or interim reexamination of income, whichever is sooner	
Chapter 12: Termination of Assistance and Tenancy		
12-I.D. MANDATORY TERMINATION OF ASSISTANCE		
Death of a Sole Family Member	For deceased single-member households, PHAs must terminate the HAP to owner no later than the last day of the month in which the death occurred. HAP remitted for any month following the month in which the death occurred are considered HAP overpayments. After confirming the head of household's death, the PHA must submit an End of Participation (EOP) Form HUD-50058 with the EOP date listed as the last day of the month in which the death occurred. The PHAs is required to submit the Form HUD-50058 no later than 60 calendar days from the effective date of the action. In cases where there is a delay between the death of an individual and when the death is reported in EIV, the PHA must submit an updated Form HUD-50058 no later than 60 days from the date EIV received the death information. The owner is entitled to receive the full HAP amount for the month in which the tenant death occurred.	

	HUD Changes	PHA Changes
Family Absence from the Unit	. The family may be absent from the unit for brief periods. The PHA must establish a policy on how long the family may be absent from the assisted unit. However, the family may not be absent from the unit for a period of more than 180 consecutive calendar days for any reason. Absence in this context means that no member of the family is residing in the unit. At its discretion, the PHA may allow absence for a lesser period in accordance with PHA policy. Housing assistance payments terminate if the family is absent for longer than the maximum period permitted. The term of the HAP contract and assisted lease also terminate. The owner must reimburse the PHA for any housing assistance payment for the period after the termination. The family must supply any information or certification requested by the PHA to verify that the family is residing in the unit or relating to family absence from the unit. The family must cooperate with the PHA for this purpose. The family must promptly notify the PHA of absence from the unit, including any information requested on the purposes of family absences. The PHA may adopt appropriate techniques to verify family occupancy or absence, including letters to the family at the unit, phone calls, visits, or questions to the landlord or neighbors. The PHA administrative plan must state the PHA policies on family absence from the dwelling unit. The PHA absence policy includes how the PHA determines whether or when the family may be absent, and for how long; and any provision for resumption of assistance after an absence, including readmission or resumption of assistance to the family.	**PHA Policy Change:** The family is required to notify the PHA when all family members will be absent from the unit for any period greater than 60 calendar days. Written notice must be provided to the PHA at the start of the extended absence. Upon PHA request, the family must provide any additional information to the PHA related to the family's absence from the unit to confirm their continued residency in the unit. The PHA may take the following actions to determine whether the family is absent from the unit: • Write letters to the family at the unit; • Telephone the family at the unit; • Contact the owner; • Interview neighbors; • Verify whether utilities are in service; and/or • Check with the post office. If the family is absent from the unit for more than 180 consecutive calendar days, the family's assistance will be terminated. Notice of termination will be sent in accordance with Section 12-II.F. A family terminated due to PHA error will be reinstated retroactively. Any family terminated due to absence from the unit may reapply for assistance when the waiting list is open.
12-I.E. MANDATORY POLICES AND OTHER AUTHORIZED TERMINATIONS	**HUD Language Added:** The family was evicted for repeated violation(s) of the lease. Repeated lease violations will include, but not be limited to, nonpayment of rent, disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises, and criminal activity.	

	HUD Changes	PHA Changes
	Generally, the criterion to be used will be whether or not the reason for the eviction was the fault of the tenant or guests.	
Asset Limitation	**HUD Added New Language:** 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.	**PHA Policy Change** The PHA 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 HCV program.
Insufficient Funding		**PHA Policy Change--Language Added:** In the event that the PHA decides to stop issuing vouchers as a result of a funding shortfall, and the PHA is not assisting the required number of special purpose vouchers (family unification program (FUP) families), when the PHA resumes issuing vouchers, the PHA will issue vouchers first to the special purpose voucher families on its waiting list until it has reached the required number of special purpose vouchers, when applicable.
12-II.D. CRITERIA FOR DECIDING TO TERMINATE ASSISTANCE **Consideration of Circumstances**	**HUD Policy Change:** →While a record or records of arrest will not be used as the sole basis for termination, an arrest may, however, trigger an investigation to determine whether the participant actually engaged in disqualifying criminal activity. As part of its investigation, the PHA may obtain the police report associated with the arrest and consider the reported circumstances of the arrest… has been changed to: When there is a record of arrest, the PHA may obtain a copy of the police report associated with the arrest and consider the circumstances of the arrest, including:	
Chapter 13: Owners		
13-I.A. OWNER RECRUITMENT AND RETENTION	**HUD Policy Change:** The PHA may utilize its Unrestricted Net Position (UNP, or administrative fee reserve) or ongoing administrative fees to make owner incentive payments (e.g.,	**PHA Policy Change:**

	HUD Changes	PHA Changes
	signing bonuses) or retention payments to owners that agree to initially lease their unit to an HCV family and/or renew the lease of an HCV family. If a PHA chooses to offer incentive or retention payments, it must adopt a policy that governs when the offer of such payments is appropriate. Owner incentive payments are not housing assistance payments, nor can they effectively serve to supplement ongoing, monthly housing assistance payments. Owner incentive payments are not part of the rent to owner, nor are they taken into consideration when determining whether the rent for the unit is reasonable.	The PHA will not provide owner incentive or retention payments.
13-II.F. CHANGE IN OWNERSHIP / ASSIGNMENT OF THE HAP CONTRACT	**HUD Language Added:** … If the above documentation is received, it will be retained in the family's file, and no new lease or HAP contract is required. The new owner is bound by the HAP contract that was executed by the previous owner.	
Chapter 14: Program Integrity		
	HUD Revised amount of federal awards required to have an independent audit. Now 1,000,000	
Chapter 15: Special Housing Types		
	• Corrected calculation in the example of how to determine utility allowance in shared housing • Added section on use of exception payment standards for shared housing	
Chapter 16: Informal Reviews and Hearings		
16-III.B. INFORMAL REVIEWS		**PHA Corrected language to informal reviews vs informal hearings:** *The PHA will notify the applicant of the final decision, including a statement explaining the reason(s) for the decision. The notice will be*

	HUD Changes	PHA Changes
		mailed within 10 business days of the informal review, to the applicant and their representative, if any, along with proof of mailing.
16-III.C. INFORMAL HEARINGS FOR PARTICIPANTS **Ensuring Accessibility for Persons with Disabilities and LEP Individuals**		**PHA Policy Language Updated:** Informal hearings will be conducted in English. For participants who may require language assistance, the PHA will responsibly use interpretation services, artificial intelligence, a PHA staff person who can interpret, and/or machine translation to communicate. The PHA may also permit families to bring an advocate, family member, friend, or other adult representative to assist in communications
16-VI.C. RECORDS MANAGEMENT **Medical/Disability Records**	**HUD Language Changed:** If the PHA receives documentation from a verification source that contains the individual's specific diagnosis, information regarding the individual's treatment, and/or information regarding the nature or severity of the person's disability, the PHA will immediately dispose of this confidential information; this information will never be maintained in the individual's file. If the information needs to be disposed of, the PHA will note in the individual's file that verification was received, the date received, and the name and address of the person/organization that provided the verification. Under no circumstances will the PHA include an applicant's or resident's medical records in the file.	
PART IX: VAWA	**HUD Language updated throughout this part to recognize the updates made to VAWA forms:** Definitions External emergency transfer refers to an emergency relocation of a tenant to another unit where the tenant would be categorized as a new applicant; that is, the tenant must undergo an application process in order to reside in the new unit. Examples include: • Project Based to Tenant Based units under HUD • Transfers from HUD funded to Rural Development funded unit	

	HUD Changes	PHA Changes
	Internal emergency transfer refers to an emergency relocation of a tenant to another unit where the tenant would not be categorized as a new applicant; that is, the tenant may reside in the new unit without having to undergo an application process. . Examples include: • Transfers within the HUD funded Project Based Unit Portfolio • Safe unit refers to a unit that the victim of VAWA violence/abuse believes is safe. VAWA violence/abuse means an incident or incidents of domestic violence, dating violence, sexual assault, or stalking, as those terms are defined in 24 CFR 5.2003 and "Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking" (Form HUD-5382).	
Chapter 19: Special Voucher Programs		
19-I.A. PROGRAM OVERVIEW:	**HUD Changed eligibility to having left foster care within 180 days from 90 days**. See language below: Youth eligible for FUPY vouchers are those who: • Are at least 18 years old and not more than 24 years of age; • Have left foster care or will leave foster care within 180 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act at age 16 and older; and • Are homeless or at risk of becoming homeless. Added the paragraph below to the regulation: FUP and FYI vouchers are subject to the requirements in Section 8(x) of the 1937 Act and 24 CFR 982, 983 (as applicable) and the Fostering Stable Housing Opportunities (FSHO) Amendments Federal Register notice except as provided in Notice PIH 2025-08 and any subsequent notice issued by HUD. The Consolidated Appropriations Act, 2024 (Public Law 118-42) authorized HUD to establish waivers and alternative requirements for FUP and FYI vouchers that are necessary for the effective delivery and administration of funds. HUD may waive or specify alternative requirements for regulatory provisions related to the administration of waiting lists, local preferences, and the initial term and extensions of tenant-based vouchers. Additionally, HUD may also waive or specify alternative requirements regarding the timing of referral of youth leaving	

	HUD Changes	PHA Changes
	foster care. HUD is not permitted to waive requirements related to tenant rights and protections, rent setting, fair housing, nondiscrimination, labor standards, and the environment.	
Assigning Vouchers [FUP FAQs]	**Added HUD Language below:** The PHA may, but is not required to, assign a specific number or percentage of FUP vouchers for FUP youths (FUPY) and FUP families (FUPF). Unless the PHA assigns a specific number or percentage of FUP vouchers to a designated FUP population, the PHA must serve any referrals (youths or families) that meet all program eligibility requirements up to the PHA's designated FUP program size.	**PHA Policy Change:** The PHA has not designated any specific number or percentage of FUP vouchers for youths or families. The PHA will serve all referrals that meet program eligibility requirements, up to the PHA's FUP voucher allocation. FUP Youth Vouchers (FUPY) will, however, be placed as a preference on the HCV Waiting List to support transition to long term subsidy.
19-I.B. PUBLIC CHILD WELFARE AGENCY (PCWA) [Notice PIH 2025-08]	**HUD Policy Change:** Families and youth do not apply directly to the PHA for FUP vouchers. They are instead referred by a PCWA with whom the PHA has entered into a Memorandum of Understanding (MOU). The partnering PCWA initially determines whether the family or youth meets the FUP program eligibility requirements listed in 19-I.C. and 19-I.D. and then refers those families or youths to the PHA who determines whether the family or youth meets HCV program eligibility requirements. The PHA conducts all other processes relating to voucher issuance and administration. Referrals may also be received from other agencies such as the Continuum of Care (CoC), or a state, local, educational, philanthropic, or faith-based organization. HUD strongly encourages PHAs and PCWAs to make decisions collaboratively on the administration of the program and to maintain open and continuous communication. In cases where the referral comes from a third-party partner, the PCWA and PHA are still responsible for determining eligibility as outlined above, including the PCWA's written certification that the youth is eligible. The PCWA must have a system for identifying FUP-eligible youth within the agency's caseload and for reviewing referrals from a Continuum of Care (COC) if applicable	**PHA Policy Change:** The PHA has entered into an MOU with Scott County Health and Human Services
19-I.E. ASSISTANCE PERIOD Statutory Exceptions		**Added PHA Policy Language:** The PHA defines incapacitated person as an individual who, for reasons other than being a

	HUD Changes	PHA Changes
		minor, is impaired to the extent of lacking sufficient understanding or capacity to make personal decisions, and who is unable to meet personal needs for medical care, nutrition, clothing, shelter, or safety, even with appropriate technological and supported decision making assistance
19-I.F. REFERRALS AND WAITING LIST MANAGEMENT	**HUD Policy Change:** Added option for PHA's to request approval from HUD to have a separate waiting list for FUP and adjusted language to address how to manage the FUP waiting list. HCV regulations require PHAs to use a single waiting list for admission to its Section 8 tenant-based assistance program. To enable PHAs to more effectively allocate FUP and FYI vouchers, HUD waived 24 CFR 982.204(f) and is establishing an optional waiver to allow PHAs to maintain a separate waiting list for FUP and FYI vouchers.	**PHA Policy Changes:** The PHA will place all FUP and FYI on both the HCV waiting list and a separate FUP and FYI waiting list in accordance with their respective position on the regular HCV waiting list. FUP and FYI applicants will not lose their position on the general HCV waiting list even though they are also placed on the separate FUP and FYI waiting list. The PHA will not remove the applicant from the general HCV waiting list upon being issued a FUP/FYI voucher. The PHA will ensure that all families on its HCV waiting list are informed of the separate FUP and FYI waiting list by posting the information on the PHA's website. Families will have an opportunity to be placed on the list should the partnering PCWA certify to their eligibility for these special purpose vouchers. In addition, the PHA will conduct outreach to organizations serving youth, families, and other service organizations so there is widespread awareness of the availability of a separate waiting list and how to access this resource and provide information on the PHA's social media sites. When providing notice, the PHA will describe the eligibility criteria for FUP and FYI vouchers and describe the actions an individual should take to be added to the FUP and FYI waiting list. The PHA notice will also

	HUD Changes	PHA Changes
		make clear to applicants that if they decide to be included on the FUP and FYI waiting list, they will not lose their position on the HCV waiting list. The PHA will use date and time of application in selecting an applicant from the FUP and FYI waiting list. The application date and time of the applicant's prior HCV application will be used for those FUP and FYI applicants that are already on the HCV waiting list
Waiting List Selection [Notice PIH 2025-08]		**PHA Policy Changes:** The PHA will not have separate local preferences for the FUP Program.
19-I.H. LEASE UP **Voucher Issuance Notice**	**HUD Changed Language:** The initial search term for FUP vouchers must be at least 120 days from the date the voucher is issued. The initial 120-day term also applies when a family or youth chooses to move to a new unit with continued assistance inside or outside the PHA's jurisdiction. PHAs must adopt an extension policy for FUP applicants that includes the following: • Each extension must be for a minimum of 90 days; • The PHA must approve the first extension request, regardless of how the request is made (written or oral) or when it is made, as long as the request is made on or before the voucher term expiration date and is consistent with applicable requirements; Subsequent requests should be processed in accordance with the PHA's administrative plan; and The PHA must, on at least one occasion after voucher issuance, notify the applicant prior to the initial term expiration, to remind them about the term expiration date and the process for requesting an extension of the initial term, and to inquire if the applicant is in need of assistance with their housing search. If a family or youth with a disability requires additional time to search for their unit, the PHA must provide an extension as a reasonable accommodation. The PHA's administrative plan must describe its policies for granting extensions of the initial 120-day term and provide clear instructions to the family and/or youth on the procedures for requesting an extension.	**PHA Policy Changes:** All FUP vouchers will have an initial term of 120 calendar days. The PHA will notify the applicant in writing via email and/or through a phone call at least 30 days prior to the expiration of the initial term of the voucher and inquire if the applicant is in need of assistance with their housing search. The PHA will also remind the applicant of the housing search assistance that is available to them as set forth in the PHA's partnership agreements. Upon written or oral request of the applicant (either through an email, phone call, or through a written form), the PHA will automatically approve one 90-day extension to the initial voucher term as long as the request is made prior to the expiration date of the initial voucher term. Subsequent requests for extensions will follow PHA policies on voucher extensions found in Chapter 5. This includes granting additional extensions as needed as a reasonable accommodation.

	HUD Changes	PHA Changes
	The family must submit a Request for Tenancy Approval and proposed lease within the 120-day period unless the PHA grants an extension. Once the family or youth locate a unit, the PHA conducts all other processes relating to voucher issuance and administration per HCV program regulations and the PHA's policies (including, but not limited to inspections, determination of rent reasonableness, etc.). A FUPY may lease a unit prior to officially leaving foster care in order to ensure a smooth transition from foster care to independence, as long as all requirements of the FUP program and HCV program are met.	
Glossary	***HUD Changes to Definitions:*** *Affiliated person. (UPDATED)* The tenant's spouse, parent, sibling, or child; or any individual, tenant, or lawful occupant living in the tenant's household; or anyone for whom the tenant acts as parent/guardian of a victim of domestic violence, dating violence, sexual assault, or stalking. *Net family assets*. *(UPDATED)* The net cash value of all assets owned by the family, after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment. In determining net family assets, PHAs or owners, as applicable, must include the value of any business or family assets disposed of by an applicant or tenant for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application for the program or reexamination, as applicable, in excess of the consideration received therefor. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered to be for less than fair market value if the applicant or tenant receives consideration not measurable in dollar terms. Negative equity in real property or other investments does not prohibit the owner from selling the property or other investments, so negative equity alone would not justify excluding the property or other investments from family assets. *Real property. (NEW)* Real property has the same meaning as that provided under the law of the state in which the property is located.	

	HUD Changes	PHA Changes
	Victim. (NEW) Any victim of VAWA violence/abuse, regardless of actual or perceived sexual orientation, gender identity, sex, or marital status. *Welfare assistance*. *(UPDATED)* Income assistance from federal or state welfare programs, including assistance provided under TANF and general assistance. Does not include assistance directed solely to meeting housing expenses, nor programs that provide health care, childcare or other services for working families. For the FSS program (24 CFR 984.103), *welfare assistance* includes only cash maintenance payments designed to meet a family's ongoing basic needs. Does not include nonrecurring short term benefits designed to address individual crisis situations, work subsidies, supportive services such as childcare and transportation provided to families who are employed, refundable earned income tax credits, contributions to and distributions from Individual Development Accounts under TANF, services such as counseling, case management, peer support, childcare information and referral, financial empowerment, transitional services, job retention, job advancement, and other employment-related services that to not provide basic income support, amounts solely directed to meeting housing expenses, amounts for health care, Supplemental Nutrition Assistance Program (SNAP) and emergency rental and utilities assistance, SSI, SSDI, or social security, and child-only or non-needy TANF grants made to or on behalf of a dependent child solely on the basis of the child's need and not the need of the child's current non-parental caretaker.	