



Housing Authority of the City of Arlington
Annual Plan
Fiscal Year Beginning 10/2024

DRAFT

(May 2, 2024)

Streamlined Annual PHA Plan (HCV Only PHAs)	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 03/31/2024
--	---	---

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA’s operations, programs, and services, including changes to these policies, and informs HUD, families served by the PHA, and members of the public of the PHA’s mission, goals and objectives for serving the needs of low- income, very low- income, and extremely low- income families.

Applicability. The Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers, and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, or PHAS if only administering public housing.
- (2) **Small PHA** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
- (3) **Housing Choice Voucher (HCV) Only PHA** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
- (4) **Standard PHA** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS and SEMAP assessments.
- (5) **Troubled PHA** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
- (6) **Qualified PHA** - A PHA with 550 or fewer public housing dwelling units and/or housing choice vouchers combined and is not PHAS or SEMAP troubled.

A. PHA Information.				
A.1	PHA Name: <u>Housing Authority of the City of Arlington</u> PHA Code: <u>TX433</u> PHA Plan for Fiscal Year Beginning: (MM/YYYY): <u>10/2024</u> PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Housing Choice Vouchers (HCVs) <u>3810</u> PHA Plan Submission Type: <input checked="" type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission Availability of Information. In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at the main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. <i>The Annual Plan is available at the main administration office of the PHA and on the PHA website.</i> <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below)			
	Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia
	Lead HA:			No. of Units in Each Program

B.	Plan Elements.
B.1	<p>Revision of Existing PHA Plan Elements.</p> <p>a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?</p> <p>Y N</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Statement of Housing Needs and Strategy for Addressing Housing Needs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Financial Resources.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Rent Determination.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Operation and Management.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Informal Review and Hearing Procedures.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Homeownership Programs.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> Substantial Deviation.</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/> Significant Amendment/Modification.</p> <p>(b) If the PHA answered yes for any element, describe the revisions for each element(s): <i>See attached modifications</i></p>
B.2	New Activities. – Not Applicable
B.3	<p>Progress Report.</p> <p>Provide a description of the PHA’s progress in meeting its Mission and Goals described in its 5-Year PHA Plan. <i>See Attachment A</i></p>
B.4	Capital Improvements. – Not Applicable
B.5	<p>Most Recent Fiscal Year Audit.</p> <p>(a) Were there any findings in the most recent FY Audit?</p> <p>Y N N/A</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, please describe:</p>
C.	Other Document and/or Certification Requirements.
C.1	<p>Resident Advisory Board (RAB) Comments.</p> <p>(a) Did the RAB(s) have comments to the PHA Plan?</p> <p>Y N</p> <p><input checked="" type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. <i>RAB supports the Annual Plan and did not provide any recommendations; see attached letter from RAB.</i></p>
C.2	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>

C.4	<p>Challenged Elements. If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p style="margin-left: 40px;">Y N</p> <p style="margin-left: 40px;"><input type="checkbox"/> <input checked="" type="checkbox"/></p> <p>If yes, include Challenged Elements.</p>
D.	<p>Affirmatively Furthering Fair Housing (AFFH).</p>
D.1	<p>Affirmatively Furthering Fair Housing (AFFH).</p> <p>Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.</p> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>Fair Housing Goal:</p> <p><u>Describe fair housing strategies and actions to achieve the goal</u></p> <p>N/A</p> </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 10px;"> <p>Fair Housing Goal:</p> <p><u>Describe fair housing strategies and actions to achieve the goal</u></p> </div> <div style="border: 1px solid black; padding: 5px;"> <p>Fair Housing Goal:</p> <p><u>Describe fair housing strategies and actions to achieve the goal</u></p> </div>

Attachment A

Streamlined Annual PHA Plan

Housing Authority of the City of Arlington, TX433

Section B.3 – Progress Report for FY2023 (10/1/2022-9/30/2023)

Provide a description of the PHA's progress in meeting its Mission and Goals described in its 5-Year PHA Plan.

1. Goal: Expand/Secure/Retain the supply of assisted housing

Objectives:

- Applied for/received: \$705,115 in NEW funding in FY23. This includes \$496,988 for ERAP-2; \$198,127 for HUD Incremental Voucher, and \$10,000 for the Dollarwise Grant.
- When Community Development Block Grant funding was limited for the Housing Rehab Program, AHA secured funding from the Arlington Housing Finance Corporation to maintain the program to provide needed repairs to affordable owner-occupied homes in Arlington.
- Received \$25,000 from Arlington Housing Finance Corporation (AHFC) through its Diversion program.
- Continuing to work with Arlington Housing Finance Corporation (AHFC) and developers for new construction or rehab of existing affordable housing. During the fiscal year, the AHFC closed on a \$40M bond transaction for the development of 6900 Matlock (aka Matlock Flats) which is scheduled to open in 2025 with 216 affordable units. AHFC also closed on a \$38M bond transaction and became the general partner for the rehab of the Rosemont at Mayfield Villas. Leasing for Reserve at Mayfield, which closed in the prior fiscal year, is now underway.

2. Goal: Maintain/Increase customer experience and satisfaction level

Objectives:

- Continued monitoring customer satisfaction surveys, addressing any issues. In FY23, AHA had 90% of all surveys reflecting excellent/good customer service.
- Utilize Constant Contact and Call Multiplier to remind clients of important events and meetings.
- Continue to use the Language Line for translation of major conversations between staff and clients.

3. Goal: Maintain/Improve the quality of assisted housing and services

Objectives:

- Utilized maximum funds available to HCV customers.
- As appropriate, staff referred customers with disabilities to the Housing Rehab Architectural Barrier Removal program for assistance.

4. Goal: Increase/Maintain assisted housing choices

Objectives:

- Participated in landlord events/briefings coordinated by Code Compliance.
- Coordinating with the Continuum of Care (CoC) for landlord outreach. The CoC worked closely with staff to identify new landlords to participate in HCV and our special needs programs.
- Developed system for available units to be quickly shared by staff with clients in the move process or who are applicants with vouchers searching for available units.
- Landlord meeting was held on 5/31/2023 to help with fostering and sustaining the relationship with the agency and property managers/owners. This meeting also serves to recruit new landlords to the Housing Choice Voucher program.
- Added 148 new properties/landlords to the program during the fiscal year.

5. Goal: Provide an improved living environment

- Provide information on the City's transportation service, utility assistance, eviction prevention, and job fairs, by distributing flyers at prelim/cert meetings and giving clients info by phone and email. Personnel hygiene and clothing items are also provided to clients during the Feast of Sharing event.

6. Goal: Promote self-sufficiency and asset development of assisted households

Objectives:

- Maintain a calendar of events on the AHA website. Programming for Family Self-Sufficiency participants is open to all assisted families.
- Hosted Educational Fair on 5/18/2023.
- Held Parent Appreciation Picnic 6/17/2023.
- Provided a Vision Board class 7/8/2023.
- Navigator regularly emails resource and job fair information to all staff who provide their clients the information for utility assistance, eviction prevention, job fairs, educational fairs, eviction prevention, and transportation services.
- AHA staff attended monthly Arlington Resource Sharing meetings to distribute resources to assisted families. The Arlington Resource Sharing meetings are attended by dozens of nonprofits, faith – based and other organizations who provide resource to lower income families.

7. Goal: Ensure equal opportunity and affirmatively further fair housing

Objectives:

- Informational flyer is displayed on lobby monitors.
- Assessed 117 Reasonable Accommodation requests.
- Completed 7 Architectural Barrier Removal projects through the Housing Rehab program.
- The City of Arlington formed a Unity Council with resulted in a report to City Council which was adopted. AHA participates in advancing solutions to concerns or issues noted in the Unity Council Report including progress toward affordable housing needs identified in the Housing Needs Analysis: emphasis on the need of affordable housing to be developed for households earning 30% and 50% AMI.

8. Goal: Promote a positive public awareness of HCV program and customers.

Objectives:

- In FY23, there were 7 different City personnel working as volunteers at AHA. They learn about resources AHA provides to customers/residents and share these with their respective departments.
- Staff met with Arlington Police Dept and North Arlington apartment complex landlords.
- East Arlington Community Resource Fair on 6/13/2024 to share resources and services with area residents and local human service agencies.
- Staff participated in the 1st Annual State of Black Arlington held 6/6/2023.
- Annual Homeownership Fair held 6/24/2023.

9. Goal: Enhance staff engagement

Objectives:

- De-escalation Training held on 6/28/2023.
- Employee Burnout course on 7/19/2023.
- Psychological Safety workshop on August 2nd.
- Promoted training opportunities for AHA staff. In FY23, staff attending training for Cyber Security Awareness, Sexual Harassment Awareness, HCV Specialist, HCV Executive Management, HCV Executive Financial Management, PIC and EIV, SEMAP, TX Public Funds Investment Act, Fair Housing, Personnel Management, Housing Pro Software modules, and FSS Continuum of Care Financial Course.
- Staff Lunch-n-Learn(s): 10/19/2022 legal services/wills; 2/8/2023 s; 4/22/2023 and TMRS (retirement) 8/4/2023.
- Congressman Mar Veasey Grant Writing Workshop on 6/28/2023

Significant Amendment/Modification

Streamlined Annual PHA Plan

Housing Authority of the City of Arlington, TX433

Section B.1 – Revision of Existing PHA Plan Elements

CHAPTER 10
HOUSING QUALITY STANDARDS AND INSPECTIONS
[24 CFR 982.401]

INTRODUCTION

National Standards for the Physical Inspection of Real Estate (NSPIRE) will become the new HUD inspection standard for tenant-based programs on October 1, 2024. Should HUD change this implementation deadline, AHA will adjust its implementation deadline accordingly. NSPIRE standards are required both at initial occupancy and during the term of the lease. NSPIRE standards apply to the building and premises, as well as the unit. Newly leased units must pass the NSPIRE inspection before the beginning date of the assisted lease and HAP contract. The AHA will inspect each unit under contract at least biennially. The AHA will also have an inspection supervisor perform quality control inspections on the number of files required for file sampling by SEMAP annually to maintain the AHA's required standards and to assure consistency in the AHA's program. This chapter describes the AHA's procedures for performing NSPIRE and other types of inspections, and AHA standards for the timeliness of repairs. It also explains the responsibilities of the owner and family, and the consequences of non-compliance with NSPIRE requirements for both families and owners. The use of the term "NSPIRE" in this Administrative Plan refers to the combination of both HUD and AHA requirements. (See 10-J.).

10-A. GUIDELINES/TYPES OF INSPECTIONS [24 CFR 982.401(a), 982.405]

All units must meet the NSPIRE Standards set forth by HUD. The AHA will not promote any additional acceptability criteria which are likely to adversely affect the health or safety of participant families, or severely restrict housing choice (SEE: APPENDIX 7- LEAD- BASED PAINT POLICIES AND PROCEDURES).

NSPIRE Inspections – Housing Choice Voucher inspections are made initially and at least biennially to ensure the unit, building and premises prioritizes health, safety and functional defects and are in compliance with NSPIRE Standards. For all other rental housing assistance programs administered by the AHA, inspections are made initially and at least annually.

10-J. ACCEPTABILITY CRITERIA AND EXCEPTIONS TO NSPIRE [24 CFR 5.705(a)(3)]

Upon implementation of NSPIRE, some previous deficiencies under HQS do not align with the NSPIRE Standard. Permission for variations have been submitted to HUD and AHA is awaiting decision. The variation requested are:

- Utilities not in service – in order for a home to be sanitary, all utility services must be in service. NSPIRE does not address the lack of maintaining utilities. The lack of a utility could present a risk of an adverse medical event, can cause temporary harm or if left without service cause or worsen a chronic condition that may have long-lasting adverse health effects.

Arlington Housing TX433 would require a 24-hour emergency repair if a unit does not have electricity, water and/or gas service. The failure to maintain utilities would be addressed to the person, tenant or landlord, who is responsible for that particular utility service.

- Broken glass – NSPIRE requires sharp edges be repaired within 30 days. Glass that is broken with jagged edges and are within reach is a safety hazard which needs to be repaired quickly. A sharp edge can result in a cut or puncture hazard and could likely require emergency care.

Arlington Housing TX433 would require a 24-hour emergency repair if a unit has broken glass, with jagged edges, that is within reach of an individual, and poses a safety hazard.

- Lack of functioning toilet – NSPIRE requires that when a toilet is damaged or inoperable and it is the only toilet in the unit the repairs be completed within 30 days. A lack of an operable toilet in a unit presents a risk of an adverse medical event, which could end in requiring a healthcare visit, can cause temporary harm or if left untreated cause or worsen a chronic condition that may have long-lasting adverse health effects. For a home to be sanitary, a functioning toilet must be present. This deficiency presents a high risk of permanent disability, or serious injury or illness, to a resident or the physical security or safety of a resident at their property would be seriously compromised.

Arlington Housing TX433 would require a 24-Hour emergency repair if a unit has no functioning toilet. No functional toilet puts the health of the family in jeopardy.

- Air conditioning not working – NSPIRE requires that a non-working AC be repaired within 30 days. Arlington Texas (the DFW area) on average has 20 days where temperatures exceed 100 degrees. This temperature is dangerous and can lead to illness up to death. In 2023 more than 300 Texans died of heat related causes. The City of Arlington's Uniform Housing Code Article X (p) states "where air conditioning is furnished to the occupant of a rental unit, failure to design to a twenty (20) degree difference between inside and outside temperatures and function to at least fifteen (15) degree difference". The penalty to not provide a working AC that meets the code requirements is a fine not to exceed \$2,000 per offence. A person commits a separate offence each day the violation continues.

Arlington Housing TX433 would require a 24-hour emergency repair when the outside temperature exceeds 99 degrees, and the air conditioner is not cooling the interior of the unit to at least 15 degrees less than the outside temperature.

- Sewer back-up – NSPIRE requires that a wastewater system that is unable to drain resulting in a sewer backup be repaired within 30 days. This deficiency presents a high risk of permanent disability, or serious injury or illness, to a resident or the physical security or safety of a resident or their property would be seriously compromised. In order for a unit to be sanitary and healthy it must have an operable sewer system.

Arlington Housing TX433 would require a 24-hour emergency repair if the sewer system is backing up into the home and/or yard.

Public Housing and Housing Choice Voucher Program
List of Discretionary Policies to Implement the Housing Opportunity Through Modernization Act (HOTMA)

HOTMA Provision / Regulation / PIH 2023-27 Reference	Required HOTMA Policy	PHA Discretionary Policies
Asset Limitation for New Admissions (24 CFR § 5.618) Reference: Notice PIH 2023-27 / Attachment A	<ul style="list-style-type: none"> • PHAs must deny admission of an applicant family for the following: <ol style="list-style-type: none"> 1. Net family assets that exceed \$100,000 (adjusted annually for inflation); and/or 2. The family has a present ownership interest in, a legal right to reside in, and the effective legal authority to sell (based on laws of the state or locality in which the property is located), real property that is suitable for occupancy by the family as a residence. 	<ul style="list-style-type: none"> • No discretion over enforcement. • Policies should indicate the general parameters PHAs will use when determining whether the location of owned real property constitutes a geographic hardship (relevant to determining whether it is considered suitable for occupancy). • See Notice PIH 2023-27 / Attachment A, section A.6 on required policy updates.

Please note that this list may be subject to further revision based on additional guidance and/or other factors.

<p>Asset Limitation at Annual and Interim Reexaminations (24 CFR § 5.618)</p> <p>Reference: Notice PIH 2023-27 / Attachment A</p>	<p>N/A</p>	<p>PHAs have the following policy options at annual and interim reexaminations:</p> <p>1. <u>Total Non-Enforcement:</u></p> <p>2. Total Enforcement:</p> <ul style="list-style-type: none"> • AHA selected total enforcement of this provision. <p>3. Limited Enforcement:</p>
---	------------	---

¹ [Pub. L. 114-201](#).

<p>Self-Certification of Net Family Assets Equal to or Less Than \$50,000 (adjusted annually for inflation) (24 CFR §§ 5.603; 5.609; 5.618; 882.515(a); 882.808(i)(1); 960.259(c)(2); 982.516(a)(3))</p> <p>Reference: Notice PIH 2023-27 / Attachment F/ Appendix</p>	<ul style="list-style-type: none"> • PHAs must determine if the family's total net family assets are equal to or less than \$50,000, and they must determine the actual income earned from the asset(s). 	<p>AHA chose to accept self-certification of net family assets equal to or less than \$50,000 (adjusted annually for inflation) at reexamination are required to fully verify net family assets every three years (882.515(a); 882,808(i)(1); 960.259(c)(2); 982.516(a)(3)).</p>
---	---	--

<p>Hardship Exemptions for Health/Medical Care Expenses & Reasonable Attendant Care & Auxiliary Apparatus Expenses – <u>General Relief</u> (24 CFR § 5.611(c)(2))</p> <p>Reference: Notice PIH 2023-27 / Attachment C</p>	<ul style="list-style-type: none"> • N/A 	<p>PHAs must state whether they will allow extensions of the 90-day hardship period and the maximum number of 90-day extension periods (if establishing a maximum policy) that a family may receive.</p> <p>AHA elects not to allow extensions of the 90-day hardship period.</p>
--	---	---

Please note that this list may be subject to further revision based on additional guidance and/or other factors.

<p>Hardship Exemptions for Health/Medical Care Expenses & Reasonable Attendant Care & Auxiliary Apparatus Expenses – <u>Phased-In Relief</u> (24 CFR § 5.611(c)(1))</p>	<ul style="list-style-type: none"> • All families 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 January 1, 2024, will begin receiving the 24-month phased-in relief at their next annual or interim reexamination, whichever occurs first on or after the date the PHA complies with HOTMA. 	<p>No discretionary elements.</p>
--	---	-----------------------------------

Please note that this list may be subject to further revision based on additional guidance and/or other factors.

<p>Reference: Notice PIH 2023-27 / Attachment C</p>	<ul style="list-style-type: none"> Families who receive phased-in relief will have eligible expenses deducted as follows: <ul style="list-style-type: none"> <u>1st twelve months</u> – in excess of 5% of annual income. <u>2nd twelve months</u> – in excess of 7.5% of annual income. <u>After 24 months</u> – in excess of 10% threshold will phase in and remain in effect unless the family qualifies for General Hardship relief. Once a family chooses to obtain general relief, a family may no longer receive the phased-in relief. 	
<p>Hardship Exemption to Continue Child Care Expense Deduction (24 CFR § 5.611(d))</p> <p>Reference: Notice PIH 2023-27 / Attachment C</p>	<ul style="list-style-type: none"> PHAs must obtain third-party verification of the family's inability to pay rent or must document in the file with the reason third-party verification was not available. PHAs must attempt to obtain third-party verification prior to the end of the 90-day period. 	<ul style="list-style-type: none"> PHAs must develop written policies to define what constitutes a hardship, which includes the family's inability to pay rent, for the purposes of the childcare expense hardship exemption. This is defined in the Admin Plan Chapter 6 page 57 and 61. No change. No extensions of the 90-day hardship period are permitted.

<p>Additional (Permissive) Deductions – Public Housing, Housing Choice Voucher, and Moderate Rehabilitation/SRO Only (24 CFR § 5.611(b)(1))</p> <p>Reference: Notice PIH 2023-27 / Attachment C</p>	<p>N/A</p>	<ul style="list-style-type: none"> • AHA elected to allow no additional permissive deductions.
---	------------	---

<p>De Minimis Errors in Income Determinations (24 CFR §§ 5.609(c)(4); 960.257(f); 982.516(f); 882.515(f); 882.808(i)(5))</p> <p>Reference: Notice PIH 2023-27 / Attachment B</p>	<ul style="list-style-type: none"> • PHAs must take corrective action to credit or repay a family if the family was overcharged tenant rent because of de minimis errors in calculating family income. • PHAs may not implement local policies to require families to repay in instances resulting in a family being undercharged for rent where the PHA miscalculated the family's income. 	<ul style="list-style-type: none"> • AHA will make direct payments to the family via check or direct deposit within 30 days.
<p>Interim Reexaminations - Decreases in Adjusted Income (24 CFR §§ 960.257(b)(2); 982.516(c)(2); 882.515(b)(2); 891.410)</p> <p>Reference: Notice PIH 2023-27 / Attachment I</p>	<ul style="list-style-type: none"> • PHAs are required by HUD to process interim reexaminations for <i>all</i> decreases in adjusted income when a family member permanently moves out of the unit. • PHAs <u>are not permitted</u> to establish a dollar figure threshold amount instead of a percentage threshold less than ten percent. 	<ul style="list-style-type: none"> • AHA will continue to process all decreases in income.

<p>Interim Reexaminations - Increases in Adjusted Income (24 CFR §§ 960.257(b)(3); 982.516(c)(3); 882.515(b)(3))</p> <p>Reference: Notice PIH 2023-27 / Attachment I</p>	<ul style="list-style-type: none"> • PHAs must conduct an interim reexamination of family income when the they become aware that the family's annual adjusted income has changed by an amount that would result in an estimated increase of ten percent or more in annual adjusted income or another amount established through a HUD notice, except PHAs may not consider any increases in <i>earned</i> 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. • PHAs <u>may not</u> establish a different threshold to conduct interim reexaminations for increases in adjusted income. 	<ul style="list-style-type: none"> • AHA will not to conduct an interim reexamination if a family reports an increase in income within three months of their next annual reexamination effective date.
<p>Interim Reexaminations - Reporting Changes & Effective Date</p>	<ul style="list-style-type: none"> • Families must report household composition changes and changes to adjusted income consistent with HOTMA requirements; however, PHAs determine 	<ul style="list-style-type: none"> • AHA's policy requires families to report changes in household composition and adjusted income within 30 days of the change occurring.

<p>(24 CFR §§ 960.257(b)(4); 982.516(d); 882.515(b)(1) - (4); 882.808(i)(4); 891.410)</p> <p>Reference: Notice PIH 2023-27 / Attachment I</p>	<p>the timeframe in which reporting must occur to be considered “timely.”</p> <ul style="list-style-type: none"> • If the PHA has adopted a retroactive rent decrease policy, it may not be applied prior to the later of: <ul style="list-style-type: none"> ○ The 1st of the month following the date of the actual decrease in income; or ○ The 1st of the month following the most recent previous income examination. 	
<p>Revocation of Consent Form (Form HUD-9886)² (24 CFR §§ 5.230(c)(5)(iii) and 24 CFR 5.232(c))</p>	<ul style="list-style-type: none"> • The executed consent form will remain effective until the family is denied assistance, the assistance is terminated, or the family provides written notification to the PHA to revoke consent. 	<ul style="list-style-type: none"> • AHA has established that revocation of consent will result in termination of assistance or denial of admission.

² Revocation of consent or refusal to sign the consent form prohibits the PHA from requesting and accessing income information and financial records, including pulling any EIV reports and using EIV data to verify income.

<p>Reference: Notice PIH 2023-27 / Attachment J</p>	<ul style="list-style-type: none"> • Families have the right to revoke consent by notice to the PHA; however, revoking consent can result in termination or denial of assistance if the PHA has established an admission and occupancy policy that the revocation of consent will result in termination of assistance or denial of admission. • PHAs may not process interim or annual reexaminations of income, including when a family's income decreases and the family requests an interim reexamination to decrease tenant rent, without the family's executed consent form(s). • PHAs must explain to families the consequences, if any, of revoking their consent. • PHAs must notify their local HUD office when an applicant or participant family member revokes their consent. <p>Note: Data matches between HUD and other agencies will continue to automatically occur, when consent is revoked, if the family is not terminated from the program.</p>	
--	---	--

Please note that this list may be subject to further revision based on additional guidance and/or other factors.

<p>Determination of Family Income Using Other Means Tested Public Assistance, i.e., “Safe Harbor” (24 CFR §§ 5.609(c)(3) and 891.105)</p> <p>Reference: Notice PIH 2023-27 / Attachment J</p>	<ul style="list-style-type: none"> • PHAs may determine the family’s income prior to the application of any deductions based on income determinations made within the previous 12-month period for purposes of the following means-tested forms of Federal public assistance: <ul style="list-style-type: none"> ○ The Temporary Assistance for Needy Families block grant (42 U.S.C. 601, et seq.). ○ Medicaid (42 U.S.C. 1396 et seq.). ○ The Supplemental Nutrition Assistance Program (42 U.S.C. 2011 et seq.). ○ The Earned Income Tax Credit (26 U.S.C. 32). ○ The Low-Income Housing Tax Credit (26 U.S.C. 42). ○ The Special Supplemental Nutrition for Woman, Infants, and Children (42 U.S.C. 1786). ○ Other programs administered by the Secretary. ○ Other means-tested forms of Federal public assistance for which HUD has established a memorandum of understanding. 	<ul style="list-style-type: none"> • AHA chooses to implement Safe Harbor income determinations at annual re-exam and new admission from the following programs: <ul style="list-style-type: none"> ○ The Temporary Assistance for Needy Families block grant (42 U.S.C. 601, et seq.). ○ Medicaid (42 U.S.C. 1396 et seq.). ○ The Supplemental Nutrition Assistance Program (42 U.S.C. 2011 et seq.). ○ The Earned Income Tax Credit (26 U.S.C. 32). ○ The Low-Income Housing Tax Credit (26 U.S.C. 42). ○ The Special Supplemental Nutrition for Woman, Infants, and Children (42 U.S.C. 1786). ○ Other programs administered by the Secretary. ○ Other means-tested forms of Federal public assistance for which HUD has established a memorandum of understanding.
---	---	--

Please note that this list may be subject to further revision based on additional guidance and/or other factors.

	<ul style="list-style-type: none"> ○ Other Federal benefit determinations made by other means-tested Federal programs that the Secretary determines to have comparable reliability and announces through a Federal Register notice. ● PHAs are not required to accept or use determinations of income from other Federal means-tested forms of assistance. ● Safe Harbor verification must be obtained by means of third-party verification and must state the family size, must be for the entire family (i.e., the family members listed in the documenting must match the family's composition in the assisted unit, except for household members) and must state the amount of the family's annual income. 	
--	---	--

<p>Enterprise Income Verification (EIV) Usage (24 CFR § 5.233)</p> <p>Reference: Notice PIH 2023-27 / Attachment J</p>	<ul style="list-style-type: none"> • PHAs must use HUD’s EIV system in its entirety, in accordance with 24 CFR 5.233. • PHAs must update their EIV policies and procedures to reflect their discretionary use of EIV reports (e.g., Income Report, zero income reports, New Hires Report, IVT) under HOTMA. 	<ul style="list-style-type: none"> • AHA will continue to use EIV during interim reexaminations and annual reexams.
--	---	--