

OHA Regular Meeting of the Board of
Commissioners
Thursday, December 19, 2024 8:30 AM
First Floor Boardroom
1823 Harney Street
Omaha, NE 68102

1. ANNOUNCEMENT OF OPEN MEETINGS ACT
2. ROLL CALL
3. PUBLIC COMMENTS
4. AUDIT PRESENTATION

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA

**FINANCIAL STATEMENTS AND
SUPPLEMENTARY INFORMATION**

YEAR ENDED DECEMBER 31, 2023

**WITH
REPORT OF INDEPENDENT AUDITORS**

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
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REPORT OF INDEPENDENT AUDITORS

To the Board of Commissioners
Housing Authority of the City of Omaha, Nebraska:

Opinion

We have audited the accompanying financial statements of the Housing Authority of the City of Omaha, Nebraska (the "Authority") as of and for the year ended December 31, 2023, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements, as listed in the accompanying table of contents.

In our opinion, the financial statements referred to above present fairly, in all material respects, the net position of the Authority as of December 31, 2023, and the changes in its net position and its cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinion

We conducted our audit in accordance with auditing standards generally accepted in the United States of America ("GAAS") and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the Auditors' Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Authority and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Authority's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditors' Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS and *Government Auditing Standards*, we

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Authority's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

Other Matters

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Other Information

Our audit was conducted for the purpose of forming an opinion on the financial statements that collectively comprise the Authority's basic financial statements. The schedule of expenditures of federal awards is presented for the purpose of additional analysis as required by Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* and is not a required part of the basic financial statements. The accompanying financial data schedule is also not a required part of the financial statements and is presented for the purposes of additional analysis as required by the U.S. Department of Housing and Urban Development.

Other Matters (continued)

Other Information (continued)

The schedule of expenditures of federal awards and the financial data schedule are the responsibility of management and were derived from and relate directly to the underlying accounting and other records used to prepare the financial statements. Such information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards and financial data schedule are fairly stated, in all material respects, in relation to the basic financial statements as a whole.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated September 19, 2024 on our consideration of the Authority's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Authority's internal control over financial reporting and compliance.

Novogradac & Company LLP

September 19, 2024
Toms River, New Jersey

MANAGEMENT'S DISCUSSION AND ANALYSIS

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
MANAGEMENT’S DISCUSSION AND ANALYSIS
DECEMBER 31, 2023

The Housing Authority of the City of Omaha, Nebraska (the “Authority”) management discussion and analysis (“MD&A”) is designed to (a) assist the reader in focusing on significant financial issues, (b) provide an overview of the Authority’s financial activity, (c) identify changes in the Authority’s financial position (its ability to address the next and subsequent year challenges), and (d) identify individual fund issues or concerns. The focus of this MD&A is on the Primary Government of the Authority which includes all the financial activity of the Authority with the exception of its discretely presented component unit.

Since the MD&A is designed to focus on the current year’s activities, resulting changes and currently known facts, please read it in conjunction with the Authority’s financial statements.

OVERVIEW OF THE FINANCIAL STATEMENTS

The basic financial statements in this report are those of a special purpose governmental entity engaged in a business type of activity. The following statements are included:

- Statement of Net Position – presents information about the Authority’s assets, liabilities, and net position and is similar to a balance sheet. The Statement of Net Position reports all financial capital resources for the Authority. This statement is presented in the format where assets minus liabilities equals “Net Position”, which is equivalent to equity in a commercial enterprise. Assets and liabilities are presented in order of liquidity and are classified as “current” (convertible to cash or expected to be used up within one year), and “non-current”. Increases or decreases in net position will serve as a useful indicator of whether the financial position of the Authority is improving.
- Statement of Revenues, Expenses, and Changes in Net Position – reports the Authority’s revenues by source and type of its expenses by category to substantiate the change in net position for the fiscal year then ended.
- Statement of Cash Flows – discloses net cash provided by, or used for operating activities, investing activities, and non-capital financial activities, and capital and related financing activities.

Net Position is reported in three broad categories:

- Net Investment in Capital Assets: This component of net position consists of all capital assets, reduced by the outstanding balances of any bonds, mortgages, notes or other borrowings that are attributable to the acquisition, construction, or improvement of those assets.
- Restricted Net Position: This component of net position consists of restricted assets, when constraints are placed on the asset by creditors (such as debt covenants), grantors, contributors, laws, regulations, etc.
- Unrestricted Net Position: Consists of net position that do not meet the definition of “Net Investment in Capital Assets”, or “Restricted Net Position”.

**HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
MANAGEMENT'S DISCUSSION AND ANALYSIS
DECEMBER 31, 2023**

OVERVIEW OF THE FINANCIAL STATEMENTS (CONTINUED)

Notes to the Financial Statements

The notes to the financial statements provide additional information that is essential to a full understanding of the data provided in the Authority-wide financial statements.

FUND FINANCIAL STATEMENTS

Traditional users of governmental financial statements will find the fund financial statements presentation more familiar. The focus is now on major funds, rather than fund types. The Authority consists of exclusively enterprise funds. Enterprise funds utilize the full accrual basis of accounting. The enterprise method of accounting is similar to accounting utilized by business in the private sector. All of the activities of the Authority are reported in a single enterprise fund.

THE AUTHORITY'S PROGRAMS

To fully understand the financial statements of the Authority, one must start with an understanding of what the Authority actually does. The following is a brief description of the programs and services that the Authority provides for the residents of Omaha.

Public and Indian Housing

The Public and Indian Housing Program is designed to provide low-cost housing. Under this program, HUD provides funding via an annual contributions contract. These funds, combined with the rental income received from tenants, are available solely to meet the operating expenses of the program.

Section 8 Housing Choice Vouchers Program

The Authority administers a program of rental assistance payments to private owners on behalf of eligible low-income families under Section 8 of the Housing and Urban Development Act of 1974. The program provides payments covering the difference between the maximum rent on a dwelling unit, as approved by HUD, and the amount of rent contribution by a participating family.

Public Housing Capital Fund Program

The purpose of the Capital Fund Program is to provide another source of funding to cover the cost of physical and management improvements and rehabilitation on existing low-income housing and improving the central office facilities. Funding for this program is provided by grants from HUD.

Business Activities

The Authority owns non-federal housing units and various interests in low income housing tax credit partnerships. Revenues earned from these activities are recorded in the Business Activities fund.

**HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
MANAGEMENT'S DISCUSSION AND ANALYSIS
DECEMBER 31, 2023**

THE AUTHORITY'S PROGRAMS (continued)

PIH Family Self Sufficiency Program

The purpose of the Family Self-Sufficiency Program is to promote the development of local strategies to coordinate the use of assistance under the Housing Choice Voucher and Public Housing programs with public and private resources to enable participating families to increase earned income and financial literacy, reduce or eliminate the need for welfare assistance, and make progress toward economic independence and self-sufficiency.

Home Investment Partnership Program

The purpose of the Home Investment Partnership Program is to expand the supply of affordable housing, particularly rental housing, for low and very low income Americans; to strengthen the abilities of State and local governments to design and implement strategies for achieving adequate supplies of decent, affordable housing; and to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and nonprofit organizations, in the production and operation of affordable housing.

Resident Opportunity and Supportive Services - Service Coordinators Program

The purpose of the ROSS Service Coordinator program is to provide funding to hire and maintain Service Coordinators who will assess the needs of residents of conventional Public Housing or Indian housing and coordinate available resources in the community to meet those needs. This program works to promote the development of local strategies to coordinate the use of assistance under the Public Housing program with public and private resources, for supportive services and resident empowerment activities. These services should enable participating families to increase earned income, reduce or eliminate the need for welfare assistance, make progress toward achieving economic independence and housing self-sufficiency, or, in the case of elderly or disabled residents, help improve living conditions and enable residents to age-in-place.

Mainstream Vouchers Program

The Authority administers a program of rental assistance payments to private owners on behalf of eligible low-income families whose head of household has a disability. The program provides payments covering the difference between the maximum rent on a dwelling unit, as approved by HUD, and the amount of rent contribution by a participating household.

Central Office Cost Center

The Central Office Cost Center ("COCC") is mandated by HUD to account for "centralized" services and functions necessary to the Authority's operations. Funding for the COCC is in the form of fees charged to other Authority programs and activities as well as to affiliate entities. The fees charged include those specified by HUD as management fees, bookkeeping fees, asset management fees and other fees for service. HUD regulates which and how fees may be charged to HUD programs.

Lower Income Housing Assistance Program - Section 8 Modification Rehabilitation

The purpose of the Lower Income Housing Assistance Program - Section 8 Modification Rehabilitation is to aid low- and very low-income families in obtaining decent, safe, and sanitary rental housing through the provision of housing assistance payments to participating owners on behalf of eligible tenants.

**HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
MANAGEMENT'S DISCUSSION AND ANALYSIS
DECEMBER 31, 2023**

THE AUTHORITY'S PROGRAMS (continued)

Choice Neighborhood Implementation Grant

The objective of the Choice Neighborhood Implementation Grant is to support the development of comprehensive neighborhood Transformation Plans. The Transformation Plan should integrate effective strategies to implement public and/or assisted housing revitalization, the coordination and design of supportive services, including educational opportunities for children, and neighborhood-level planning to improve a range of neighborhood assets. The Transformation Plan should be created as part of a collaborative planning process that involves neighborhood stakeholders and local governmental entities to build the necessary support to successfully implement the plan.

Emergency Housing Vouchers Program

During the year ended December 31, 2021, the Authority was awarded Emergency Housing Vouchers. These funds are to be used to assist individuals and families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability.

Choice Neighborhood Planning Grant

The objective of the Choice Neighborhood Planning grant is to support the development of comprehensive neighborhood revitalization plans which focused on directing resources to address three core goals: Housing, People and Neighborhoods. To achieve these core goals, communities must develop and implement a comprehensive neighborhood revitalization strategy, or Transformation Plan. The Transformation Plan will become the guiding document for the revitalization of the public and/or assisted housing units while simultaneously directing the transformation of the surrounding neighborhood and positive outcomes for families.

FINANCIAL HIGHLIGHTS

Total Assets for FY 2022 were \$50,220,963 and for FY 2023 the amount was \$50,553,778. This represents an overall net decrease of \$306,407 or 0.6%.

Capital Assets (net) decreased from \$32,529,203 in FY 2022 to \$32,308,384 in FY 2023, or by \$220,819 or 0.7%. The decrease is the net amount of depreciation expense in FY 2023 of \$3,149,000 and capital asset additions of \$2,989,485.

Current liabilities increased from \$2,090,436 in FY 2022 to \$2,544,040 in FY 2023 or by \$453,604 or 21.7%. The increase is primarily due to increases in the prepaid tenant rent.

Non-current liabilities increased from \$3,706,152 in FY 2022 to \$3,912,741 in FY 2023 or by \$206,589 or 5.6%.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
MANAGEMENT'S DISCUSSION AND ANALYSIS
DECEMBER 31, 2023

ANALYSIS OF ENTITY-WIDE ASSETS & LIABILITIES (STATEMENT OF NET POSITION)

The table below illustrates our analysis:

	<u>2023</u>	<u>2022</u>	<u>Net Change</u>	<u>Percent Variance</u>
Cash & Cash Equivalents	\$ 7,053,061	\$ 6,345,758	\$ 707,303	11.1%
Other Current Assets	2,766,349	2,792,897	(26,548)	-1.0%
Other Non-Current Assets	8,093,169	8,859,512	(766,343)	-8.6%
Net Capital Assets	<u>32,308,384</u>	<u>32,529,203</u>	<u>(220,819)</u>	-0.7%
Total Assets	<u>\$ 50,220,963</u>	<u>\$ 50,527,370</u>	<u>\$ (306,407)</u>	-0.6%
Current Liabilities	\$ 2,544,040	\$ 2,090,436	\$ 453,604	21.7%
Non Current Liabilities	3,912,741	3,706,152	206,589	5.6%
Deferred Inflow of Resources	<u>2,241,157</u>	<u>2,446,908</u>	<u>(205,751)</u>	-8.4%
Total Liabilities and Deferred Inflows	<u>8,697,938</u>	<u>2,446,908</u>	<u>6,251,030</u>	255.5%
Net Investment in Capital Assets	29,969,319	30,113,313	(143,994)	-0.5%
Restricted Net Position	4,429,543	4,716,695	(287,152)	-6.1%
Unrestricted Net Position	<u>7,124,163</u>	<u>7,453,866</u>	<u>(329,703)</u>	4.4%
Total Net Position/Liabilities/Equity	<u>\$ 50,220,963</u>	<u>\$ 50,527,370</u>	<u>\$ (306,407)</u>	-0.6%

ANALYSIS OF CAPITAL ASSET ACTIVITY

The table below illustrates the changes in Capital Assets throughout the fiscal year:

	<u>2023</u>	<u>2022</u>	<u>Net Change</u>	<u>Percent Variances</u>
Land	\$ 8,278,584	\$ 8,278,584	\$ -	0.0%
Buildings	206,695,165	204,627,633	2,067,532	1.0%
Furniture, Equip., & Mach.	7,724,489	7,118,263	606,226	8.5%
Construction in Process	<u>1,022,592</u>	<u>807,011</u>	<u>215,581</u>	26.7%
Total Fixed Assets	<u>223,720,830</u>	<u>220,831,491</u>	<u>2,889,339</u>	1.3%
Accumulated Depreciation	<u>(191,412,446)</u>	<u>(188,302,288)</u>	<u>(3,110,158)</u>	1.7%
Net Fixed Assets	<u>\$ 32,308,384</u>	<u>\$ 32,529,203</u>	<u>\$ (220,819)</u>	-0.7%

In fiscal year 2023, the Authority acquired capital assets in the amount of \$2,989,485 from outside vendors which in total, were offset by an annual depreciation increase of \$3,149,000, yielding a decrease in net capital assets of \$220,819 or 0.7%.

Note 5 summarizes the activity of all of capital assets.

**HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
MANAGEMENT'S DISCUSSION AND ANALYSIS
DECEMBER 31, 2023**

ANALYSIS OF LONG-TERM DEBT

The Authority's long-term debt at December 31, 2023 and 2022 amounted to \$2.3 million and \$2.4 million, respectively, a decrease of approximately 0.1%. The decrease was due to annual principal payments.

ANALYSIS OF ENTITY-WIDE REVENUES

The Authority administers the following programs and the revenues generated from these programs during Fiscal Year Ended 2023 were as follows:

Program	Revenues Generated	
Section 8 Housing Choice Vouchers (HCV)	\$	41,390,885
Emergency Housing Vouchers		1,221,227
Public and Indian Housing (LIPIH)		17,288,667
Public Housing Capital Fund (CPF)		7,792,279
Choice Neighborhood Implementation Grant		869,875
Mainstream Vouchers (MV)		791,148
HOME Investment Partnership Program		193,420
Resident Opportunities and Self-Sufficiency Program (ROSS)		272,106
PIH Family Self-Sufficiency Program		426,972
Lower Income HAP - Section 8 Moderate Rehabilitation		546,513
Component Unit Blended		1,583,903
Business Activities		431,745
OOOC		657,830
Total Revenue	\$	73,466,570

Total revenues for FY 2022 were \$73,301,478 as compared to \$73,466,570 of total revenues for FY 2023. Comparatively, FY 2023 revenues decreased in relation to FY 2022 revenues by \$165,092.

ANALYSIS OF ENTITY-WIDE EXPENSES

The table below illustrates our analysis:

	2023	2022	Net Change	Percent Variances
Administrative	\$ 11,609,969	\$ 10,705,860	\$ 904,109	8.4%
Tenant Services	710,395	506,827	203,568	40.2%
Utilities	3,400,492	3,159,649	240,843	7.6%
Maintenance	12,469,204	12,233,476	235,728	1.9%
Protective Services	717,730	716,969	761	0.1%
Insurance and General Expense	2,374,344	2,034,417	339,927	16.7%
Housing Assistance Payments	39,724,615	38,164,959	1,559,656	4.1%
Depreciation Expense	3,149,000	3,142,437	6,563	0.2%
Total Expenses	\$ 74,155,749	\$ 70,664,594	\$ 3,491,155	4.9%

**HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
MANAGEMENT'S DISCUSSION AND ANALYSIS
DECEMBER 31, 2023**

Administrative expenditures for FY 2022 were \$10,705,860 as compared to \$11,609,969 in FY 2023. This represents an increase of \$904,109 or 8.4%. The increase was caused by turnover in the Authority in the prior year.

Maintenance expenditures for FY 2023 were \$12,469,204 as compared to \$12,233,476 in FY 2022, an increase of \$235,728 or 1.9%. This increase is primarily due to the Authority entering into several new repairs and maintenance contracts during the audit period.

Housing assistance payments for FY 2023 were \$39,724,615 as compared to \$38,164,959 in FY 2022, an increase of \$1,559,656 or 4.1%. This is primarily due to an increase in the average HAP payment paid to landlords during FY 2023.

Depreciation Expense for FY 2023 was \$3,149,000 as compared to \$3,142,437 in FY 2022, an increase of \$6,563 or 0.2%. This increase was due to the purchase of several assets during the audit period.

FINANCIAL CONTACT

The financial report is designed to provide a general overview of the Authority's finances for all those with an interest. Questions concerning any of the information provided in this report or request for additional information should be addressed to Ashley Hatheway, Chief Financial Officer of the Housing Authority of the City of Omaha, Nebraska.

FINANCIAL STATEMENTS

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
STATEMENT OF NET POSITION
AS OF DECEMBER 31, 2023

ASSETS

Current assets:

Cash and cash equivalents	\$ 7,053,061
Tenant security deposits	656,271
Accounts receivable, net	1,576,054
Prepaid expenses	314,363
Assets held for sale	<u>20,560</u>

Total current assets	<u>9,620,309</u>

Non-current assets:

Restricted cash	5,390,869
Leases receivable, net of current portion	2,864,252
Other assets	37,149
Capital assets, net	<u>32,308,384</u>

Total non-current assets	<u>40,600,654</u>

Total assets	<u><u>\$ 50,220,963</u></u>

See accompanying notes to financial statements.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
STATEMENT OF NET POSITION (continued)
AS OF DECEMBER 31, 2023

LIABILITIES

Current liabilities:	
Accounts payable	\$ 719,936
Accrued expenses	187,165
Tenant security deposits	656,271
Unearned revenue	619,218
Loans payable, current	48,168
Other current liabilities	<u>313,282</u>
Total current liabilities	<u>2,544,040</u>
Non-current liabilities:	
Accrued compensated absences, non-current	719,803
Loans payable, non-current	2,290,897
Other non-current liabilities	<u>902,041</u>
Total non-current liabilities	<u>3,912,741</u>
Total liabilities	<u>6,456,781</u>

DEFERRED INFLOWS OF RESOURCES

Deferred inflows - cell tower leases	<u>2,241,157</u>
Total deferred inflows of resources	<u>2,241,157</u>

NET POSITION

Net position:	
Net investment in capital assets	29,969,319
Restricted	4,429,543
Unrestricted	<u>7,124,163</u>
Total net position	<u>41,523,025</u>
Total liabilities, deferred inflows of resources, and net position	<u>\$ 50,220,963</u>

See accompanying notes to financial statements.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
STATEMENT OF REVENUES, EXPENSES
AND CHANGES IN NET POSITION
FOR THE YEAR ENDED DECEMBER 31, 2023

Operating revenues:	
Tenant revenue	\$ 9,028,534
HUD operating grants	59,332,832
Other government grants	1,049,211
Other revenues	<u>1,362,587</u>
Total operating revenues	<u>70,773,164</u>
Operating expenses:	
Administrative	11,609,969
Tenant services	710,395
Utilities	3,400,492
Ordinary repairs and maintenance	12,469,204
Protective services	717,730
Insurance	1,459,243
General expenses	915,101
Housing assistance payments	39,724,615
Depreciation	<u>3,149,000</u>
Total operating expenses	<u>74,155,749</u>
Operating loss	<u>(3,382,585)</u>
Non-operating revenues (expenses):	
Investment income	263,174
Interest expense	(71,670)
Gain on sale of fixed assets	<u>488,881</u>
Net non-operating revenues	<u>680,385</u>
Loss before capital grants and transfers	(2,702,200)
Capital grants	<u>1,941,351</u>
Change in net position	(760,849)
Net position, beginning of year	<u>42,283,874</u>
Net position, end of year	<u>\$ 41,523,025</u>

See accompanying notes to financial statements.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
STATEMENT OF CASH FLOWS
FOR THE YEAR ENDED DECEMBER 31, 2023

Cash Flows from Operating Activities:	
Cash received from grantors	\$ 60,569,062
Cash received from tenants	10,332,748
Cash paid to suppliers	(58,396,326)
Cash paid to employees	<u>(11,633,919)</u>
Net cash provided by operating activities	<u>871,565</u>
Cash Flows from Capital and Related Financing Activities:	
Principal payments on long term debt	(76,825)
Interest paid on long term debt	(71,670)
Proceeds from capital grants	1,941,351
Purchase of capital assets	(2,989,485)
Proceeds from sale of capital assets	<u>517,000</u>
Net cash used in capital and related financing activities	<u>(679,629)</u>
Cash Flows from Investing Activities:	
Interest received on leases	115,178
Interest received on notes receivable	<u>147,996</u>
Net cash provided by investing activities	<u>263,174</u>
Net increase in cash, cash equivalents, and restricted cash	455,110
Cash, cash equivalents, and restricted cash, beginning of year	<u>12,645,091</u>
Cash, cash equivalents, and restricted cash, end of year	<u><u>\$ 13,100,201</u></u>
A reconciliation of cash, cash equivalents, and restricted cash to the Statement of Net Position is as follows:	
Cash and cash equivalents	\$ 7,053,061
Tenant security deposits	656,271
Restricted cash	<u>5,390,869</u>
Total cash, cash equivalents, and restricted cash	<u><u>\$ 13,100,201</u></u>

See accompanying notes to financial statements.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
STATEMENT OF CASH FLOWS (continued)
FOR THE YEAR ENDED DECEMBER 31, 2023

Reconciliation of operating loss to net cash
provided by operating activities:

Operating loss	\$ (3,382,585)

Adjustments to reconcile operating loss to net cash
provided by operating activities:

Depreciation	3,149,000
Bad debt - tenants	568,526

Changes in assets and liabilities:

Accounts receivable - HUD and other government	392,770
Accounts receivable - tenants and other	(895,417)
Prepaid expenses	6,010
Lease receivable	187,957
Other assets	314,037
Accounts payable	249,196
Accrued compensated absences	125,583
Accrued expenses	(57,135)
Tenant security deposits	1,555
Unearned revenue	300,148
Deferred inflows of resources	(205,751)
Other current liabilities	143,552
Other liabilities	<u>(25,881)</u>

Net cash provided by operating activities	\$ <u><u>871,565</u></u>

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

A. Organization

The Housing Authority of the City of Omaha, Nebraska (the "Authority") is a governmental, public corporation created under federal and state housing laws for the purpose of engaging in the development, acquisition and administrative activities of the low-income housing program and other programs with similar objectives for low and moderate income families residing in the City of Omaha, Nebraska (the "City"). The Authority is responsible for operating certain low-rent housing programs in the City under programs administered by the U.S. Department of Housing and Urban Development ("HUD"). These programs provide housing for eligible families under the United States Housing Act of 1937, as amended.

The Authority is governed by a board of seven members who serve five year terms. The governing board is essentially autonomous but responsible to HUD. An Executive Director is appointed by the Authority's board of commissioners to manage the day-to-day operations of the Authority.

B. Basis of Accounting / Financial Statement Presentation

The Authority's financial statements are prepared in accordance with accounting principles generally accepted in the United States of America ("GAAP"). The Governmental Accounting Standards Board ("GASB") is responsible for establishing GAAP for state and local governments through its pronouncements (Statements and Interpretations).

The programs of the Authority are organized as separate accounting entities. Each program is accounted for by a separate set of self-balancing accounts that comprise its assets, deferred outflows of resources, liabilities, deferred inflows of resources, net position (program equity), revenues, and expenses. The individual programs account for the governmental resources allocated to them for the purpose of carrying on specific programs in accordance with laws, regulations, or other restrictions, including those imposed by HUD. The programs of the Authority are combined and considered an enterprise fund. An enterprise fund is used to account for activities that are operated in a manner similar to those found in the private sector.

The Authority's enterprise fund is accounted for using the economic resources measurement focus and the accrual basis of accounting. Revenues, expenses, gains, and losses from assets and liabilities resulting from exchange and exchange-like transactions are recognized when the exchange takes place.

The Authority's financial statements are prepared in accordance with GASB 34, *Basic Financial Statements and Management's Discussion and Analysis for State and Local Governments* ("GASB 34"), as amended. GASB 34 requires the basic financial statements to be prepared using the economic resources measurement focus and the accrual basis of accounting and requires the presentation of a Statement of Net Position, a Statement of Revenues, Expenses and Changes in Net Position and Statement of Cash Flows. GASB 34 also requires the Authority to include management's discussion and analysis as part of the Required Supplemental Information.

The Authority's primary source of non-exchange revenue relates to grants and subsidies. In accordance with GASB 33, *Accounting and Financial Reporting for Non-exchange Transactions*, ("GASB 33") grant and subsidy revenue are recognized at the time eligible program expenditures occur and/or the Authority has complied with the grant and subsidy requirements.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

B. Basis of Accounting / Financial Statement Presentation (continued)

On January 30, 2008, HUD issued *PIH Notice 2008-9* which requires that unused housing assistance payments ("HAP") under proprietary fund reporting should be reported as restricted net position, with the associated cash and investments also being reported on HUD's Financial Data Schedule ("FDS") as restricted. Any unused administrative fees should be reported as unrestricted net position, with the associated assets being reported on the FDS as unrestricted.

Both administrative fee and HAP revenue continue to be recognized under the guidelines set forth in GASB 33. Accordingly, both the time and purpose restrictions as defined by GASB 33 are met when these funds are available and measurable, not when these funds are expended. The Housing Choice Vouchers program is no longer a cost reimbursement grant; therefore, the Authority recognizes unspent administrative fee and HAP revenue in the reporting period as revenue for financial statement reporting.

In accordance with 2 CFR 200.305(b)(9), any investment income earned up to \$500 on these funds may be retained by the Authority. Amounts in excess of \$500 must be remitted annually to the Department of Health and Human Services, Payment Management System.

Effective January 1, 2023, the Authority adopted GASB Statement No.96, *Subscription-Based Information Technology Arrangements* ("GASB 96"). GASB 96 improves the financial reporting by establishing a definition for subscription-based information technology arrangements ("SBITA") and providing uniform guidance for accounting and financial reporting for transactions that meet the definition of SBITA. For the year ended December 31, 2023, the adoption of GASB 96 did not have a material effect on the financial statements of the Authority.

Funds

The accounts of the Authority are organized and operated on the basis of funds. A fund is an independent fiscal and accounting entity with a self-balancing set of accounts. Fund accounting segregates funds according to their intended purpose and is used to aid management in demonstrating compliance with finance-related legal and contractual provisions. The minimum number of funds is maintained consistent with legal and managerial requirements. The Authority maintains the following type of proprietary fund:

Enterprise Fund – The Authority's operations are presented as a single enterprise fund. The transactions for each of the programs of the Authority are accounted for in separate funds for internal purposes and grant requirements and combined into one enterprise fund for external financial reporting.

Measurement Focus and Basis of Accounting

Proprietary funds distinguish operating revenues and expenses from non-operating items. Operating revenues and expenses generally result from providing services and producing and delivering goods in connection with proprietary funds' principal ongoing operations. The principal operating revenues of the Authority's funds are rent and maintenance charges to residents, operating grants and subsidies from HUD, and administration fees earned.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

B. Basis of Accounting / Financial Statement Presentation (continued)

Measurement Focus and Basis of Accounting (continued)

Operating expenses for proprietary funds include the administrative costs of providing services to residents and the housing assistance payments to residents. All revenues and expenses not meeting this definition are reported as non-operating revenues and expenses.

C. Reporting Entity

In accordance with GASB 61, *The Financial Reporting Entity Omnibus - An Amendment of GASB Statement No. 14 and No. 34*, ("GASB 61") the Authority's basic financial statements include those of the Authority and any component units. Component units are legally separate, tax-exempt organizations whose majority of officials are appointed by the primary government or the organization is fiscally dependent on the primary government and there is a potential for those organizations either to provide specific financial benefits to, or impose specific financial burdens on, the primary government. An organization has a financial benefit or burden relationship with the primary government if any one of the following conditions exist:

1. The primary government (Authority) is legally entitled to or can otherwise access the organization's resources.
2. The primary government is legally obligated or has otherwise assumed the obligation to finance the deficits of, or provide financial support to, the organization.
3. The primary government is obligated in some manner for the debt of the organization.

Based upon the application of these criteria, this report includes blended component units.

The Authority's blended component units are, although legally separate entities, in substance part of the Authority's operations and so data from these units are combined with data of the primary government and reflected in the Statement of Net Position, Statement of Revenues, Expenses and Changes in Net Position and Statement of Cash Flows. As of December 31, 2023, the Authority's blended component units consisted of the following:

- Housing in Omaha, Inc
- Omaha Crown Limited Partnership I
- Omaha Crown Limited Partnership II
- Strehlow Housing Partners Limited Partnership
- North Omaha Affordable Housing Limited Partnership
- 1613 Farnam Street Limited Liability Company
- 1234 South 13th Street Limited Liability Company
- Securities Building Limited Partnership
- Keystone Crown I, LP

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

D. Description of Programs

The Authority maintains its accounting records by program. A summary of the significant programs operated by the Authority is as follows:

Public and Indian Housing Program

The Public and Indian Housing Program is designed to provide low-cost housing. Under this program, HUD provides funding via an annual contributions contract. These funds, combined with the rental income received from tenants, are available solely to meet the operating expenses of the program.

Section 8 Housing Choice Vouchers

The Authority administers a program of rental assistance payments to private owners on behalf of eligible low-income families under Section 8 of the Housing and Urban Development Act of 1974. The program provides payments covering the difference between the maximum rent on a dwelling unit, as approved by HUD, and the amount of rent contribution by a participating family.

Public Housing Capital Fund

The purpose of the Capital Fund Program is to provide another source of funding to cover the cost of physical and management improvements and rehabilitation on existing low-income housing and improving the central office facilities. Funding for this program is provided by grants from HUD.

Resident Opportunity and Supportive Services Program / Service Coordinators ("ROSS")

The purpose of the ROSS Service Coordinator program is to provide funding to hire and maintain Service Coordinators who will assess the needs of residents of conventional Public Housing or Indian housing and coordinate available resources in the community to meet those needs. This program works to promote the development of local strategies to coordinate the use of assistance under the Public Housing program with public and private resources, for supportive services and resident empowerment activities. These services should enable participating families to increase earned income, reduce or eliminate the need for welfare assistance, make progress toward achieving economic independence and housing self-sufficiency or, in the case of elderly or disabled residents, help improve living conditions and enable residents to age-in-place.

Business Activities

The Authority owns non-federal housing units and various interests in low income housing tax credit partnerships. Revenues earned from these activities are recorded in the Business Activities fund.

PIH Family Self Sufficiency Program

The purpose of the Family Self-Sufficiency Program is to promote the development of local strategies to coordinate the use of assistance under the Housing Choice Voucher and Public Housing programs with public and private resources to enable participating families to increase earned income and financial literacy, reduce or eliminate the need for welfare assistance, and make progress toward economic independence and self-sufficiency.

Home Investment Partnership Program

The purpose of the Home Investment Partnership Program is to expand the supply of affordable housing, particularly rental housing, for low and very low income Americans; to strengthen the abilities of state and local governments to design and implement strategies for achieving adequate supplies of decent, affordable housing; and to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and nonprofit organizations, in the production and operation of affordable housing.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

D. Description of Programs (continued)

Mainstream Vouchers Program

The Authority administers a program of rental assistance payments to private owners on behalf of eligible low-income families whose head of household has a disability. The program provides payments covering the difference between the maximum rent on a dwelling unit, as approved by HUD, and the amount of rent contribution by a participating household.

Central Office Cost Center

The Central Office Cost Center ("COCC") is mandated by HUD to account for "centralized" services and functions necessary to the Authority's operations. Funding for the COCC is in the form of fees charged to other Authority programs and activities as well as to affiliate entities. The fees charged include those specified by HUD as management fees, bookkeeping fees, asset management fees and other fees for service. HUD regulates which and how fees may be charged to HUD programs.

Lower Income Housing Assistance Program - Section 8 Modification Rehabilitation

The purpose of the Lower Income Housing Assistance Program - Section 8 Modification Rehabilitation is to aid low- and very low-income families in obtaining decent, safe, and sanitary rental housing through the provision of housing assistance payments to participating owners on behalf of eligible tenants.

Choice Neighborhood Implementation Grant

The objective of the Choice Neighborhood Implementation Grant is to support the development of comprehensive neighborhood Transformation Plans. The Transformation Plan should integrate effective strategies to implement public and/or assisted housing revitalization, the coordination and design of supportive services, including educational opportunities for children, and neighborhood-level planning to improve a range of neighborhood assets. The Transformation Plan should be created as part of a collaborative planning process that involves neighborhood stakeholders and local governmental entities to build the necessary support to successfully implement the plan.

Emergency Housing Vouchers Program

During the year ended December 31, 2023, the Authority was awarded Emergency Housing Vouchers. These funds are to be used to assist individuals and families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability.

Choice Neighborhood Planning Grant

The objective of the Choice Neighborhood Planning grant is to support the development of comprehensive neighborhood revitalization plans which focused on directing resources to address three core goals: Housing, People and Neighborhoods. To achieve these core goals, communities must develop and implement a comprehensive neighborhood revitalization strategy, or Transformation Plan. The Transformation Plan will become the guiding document for the revitalization of the public and/or assisted housing units while simultaneously directing the transformation of the surrounding neighborhood and positive outcomes for families.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

E. Use of Management Estimates

The preparation of financial statements in accordance with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect certain reported amounts of assets and liabilities, and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Significant estimates include the allowance for doubtful accounts, accrued expenses and other liabilities, depreciable lives of properties and equipment and contingencies. Actual results could differ significantly from these estimates.

F. Cash and Cash Equivalents

HUD requires housing authorities to invest excess funds in obligations of the United States, certificates of deposit or any other federally insured investment.

HUD also requires that deposits be fully collateralized at all times. Acceptable collateralization includes FDIC insurance and the market value of securities purchased and pledged to the political subdivision. Pursuant to HUD restrictions, obligations of the United States are allowed as security for deposits. Obligations furnished as security must be held by the Authority or with an unaffiliated bank or trust company for the account of the Authority.

For the statement of cash flows, cash and cash equivalents include all cash balances and highly liquid investments with a maturity of three months or less at time of purchase. It is the Authority's policy to maintain collateralization in accordance with HUD requirements.

G. Accounts Receivable, Net

Rents are due from tenants on the first day of each month. As a result, tenants' accounts receivable balances primarily consist of rents past due and vacated tenants. Also included in accounts receivable are those amounts that tenants owe the Authority as payment for committing fraud or misrepresentation. These charges usually consist of retroactive rent and other amounts that may be determined by a formal written agreement or by a court order. An allowance for doubtful accounts is established to provide for all accounts, which may not be collected in the future for any reason.

The Authority recognizes a receivable from HUD and other governmental agencies for amounts billed but not received and for amounts unbilled but earned as of year-end.

H. Allowance for Doubtful Accounts

The Authority periodically reviews all accounts receivable to determine the amount, if any, that may be uncollectable. If it is determined that an account or accounts may be uncollectable, the Authority prepares an analysis of such accounts and records an appropriate allowance against such amounts.

I. Prepaid Expenses

Prepaid expenses represent amounts paid as of year-end that will benefit future operations.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

J. Notes Receivable

The Authority has utilized development funds in accordance with HUD guidelines to assist in the construction and redevelopment of affordable housing developments through the issuance of mortgage notes. When preparing financial statements in accordance with GAAP, management is required to make estimates as to the collectability of such mortgage notes. When estimating collectability, management analyzes the value of the underlying mortgaged property, the property's ability to generate positive cash flow, and current economic trends and conditions. Management utilizes these estimates and judgments in connection with establishing an allowance for uncollectable amounts during an accounting period.

K. Lease Receivable

Lease receivables are recognized at the net present value of the leased assets at a borrowing rate either explicitly described in the lease agreement or implicitly determined by the Authority.

L. Capital Assets, Net

Capital assets are stated at cost. Expenditures for repairs and maintenance are charged directly to expense as they are incurred. Expenditures determined to represent additions or betterments are capitalized. Depreciation is calculated using the straight-line method based on the estimated useful lives of the following asset groups:

• Buildings	5 - 27.5 Years
• Furniture and Equipment	5 - 15 Years
• Site Improvements	7 - 27.5 Years

The Authority has established a capitalization threshold of \$5,000.

M. Impairment of Long Lived Assets

The Authority evaluates events or changes in circumstances affecting long-lived assets to determine whether an impairment of its assets has occurred. If the Authority determines that a capital asset is impaired, and that impairment is significant and other-than-temporary, then an impairment loss will be recorded in the Authority's financial statements. For the year ended December 31, 2023, no impairment losses were recognized.

N. Inter-Program Receivables and Payables

Inter-program receivables and payables are all classified as either current assets or current liabilities and are the result of the use of a concentrated account depository as the common paymaster for most of the programs of the Authority. Cash settlements are made monthly. All inter-program balances are reconciled, and inter-program receivables and payables balances net to zero. In accordance with GASB 34, inter-program receivables and payables are eliminated for financial statement purposes. Detail balances by program are found in the Financial Data Schedule of this report.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

O. Accounts Payable and Accrued Liabilities

The Authority recognizes a liability for goods and services received but not paid for as of year-end. It also recognizes a liability for wages and fringe benefits related to services performed at year-end but not yet paid to employees or taxing authorities.

P. Unearned Revenue

The Authority's unearned revenue primarily consists of the prepayment of rent by residents and the receipt of HUD and other grant funding applicable to future periods prior to incurring the corresponding expense.

Q. Accrued Compensated Absences

Compensated absences are those absences for which employees will be paid in accordance with the Authority's Personnel Policy. A liability for compensated absences that are attributable to services already rendered and that are not contingent on a specific event that is outside the control of the Authority and its employees, is accrued as employees earn the rights to the benefits. Compensated absences that relate to future services or that are contingent on a specific event that is outside the control of the Authority and its employees are accounted for in the period in which such services are rendered or in which such event takes place.

R. Deferred Inflows of Resources

In addition to liabilities, the Statement of Net Position will sometimes report a separate section for deferred inflows of resources. This separate financial statement element represents an acquisition of net position that applies to a future period and so will not be recognized as an inflow of resources until that time.

S. Net Position Classifications

Net position is displayed in three components:

Net investment in capital assets - Consists of capital assets including restricted capital assets, net of accumulated depreciation and reduced by the outstanding balances of any bonds, mortgages, notes, or other borrowings that are attributable to the acquisition, construction or improvement of those assets.

Restricted net position - Consists of resources with constraints placed on the use either by (1) external groups such as creditors, grantors, contributors, laws or regulations of other governments; or (2) law through constitutional provisions or enabling legislation.

Unrestricted net position - All other resources that do not meet the definition of "restricted" or "net investment in capital assets."

T. Use of Restricted Assets

When both restricted and unrestricted resources are available for a particular restricted use, it is the Authority's policy to use restricted resources first, and then unrestricted resources as needed.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

U. Operating Revenues and Expenses

The Authority defines its operating revenues as income derived from charges to residents and others for services provided as well as government subsidies and grants used for operating purposes. The Authority receives annual operating subsidies from HUD, subject to limitations prescribed by HUD. Operating subsidies from HUD are recorded when received and are accounted for as revenue. Other contributions from HUD that are for development and modernization of capital assets are reflected separately in the accompanying financial statements as capital grants. Operating expenses are costs incurred in the operation of its program activities to provide services to residents and others. The Authority classifies all other revenues and expenses as non-operating.

V. Taxes

The Authority is a unit of local government under Nebraska law and is exempt from real estate, sales and income taxes.

W. Budgets and Budgetary Accounting

The Authority adopts annual, appropriated operating budgets for all its programs receiving federal expenditure awards and are used as a management tool throughout the accounting cycle. All budgets are prepared on a HUD basis, which differs with accounting principles generally accepted in the United States of America. All appropriations lapse at HUD's program year end or at the end of grant periods.

X. Regulated Leases

The Authority is a lessor of residential dwelling units under regulated leases as defined by GASB 87 and as such recognizes rental revenue in accordance with the terms of the lease contract. The leases which are twelve months in length are regulated by HUD as to rent, unit size, household composition and tenant income. For the year ended December 31, 2023, rental revenue earned by the Authority under the aforementioned leases totaled \$8,273,800.

Y. Economic Dependency

The Section 8 Housing Choice Vouchers and Public and Indian Housing programs of the Authority are economically dependent on operating grants and subsidies from HUD. The programs operate at a loss prior to receiving subsidies.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 2. CASH AND CASH EQUIVALENTS AND RESTRICTED CASH

As of December 31, 2023, the Authority had funds on deposit in checking, savings and money market accounts. As of December 31, 2023, the carrying amount of the Authority's cash (on deposit) was \$13,100,201 and the bank balances were \$13,742,532. Cash and cash equivalents consist of the following:

<u>Cash Category</u>	<u>Amount</u>
Unrestricted	\$ 7,053,061
Tenant security deposits	656,271
Restricted	<u>5,390,869</u>
Total cash, cash equivalents, and restricted cash	<u>\$ 13,100,201</u>

Of the bank balances, \$867,308 was covered by federal depository insurance and the remaining \$12,875,224 was collateralized with the pledging financial institution as of December 31, 2023.

Custodial credit risk is the risk that, in the event of a bank failure, the government's deposits may not be returned to it. As of December 31, 2023, the Authority's bank balances were not exposed to custodial credit risk.

NOTE 3. ACCOUNTS RECEIVABLE, NET

Accounts receivable, net consists of the following at December 31, 2023;

<u>Description</u>	<u>Amount</u>
Accounts receivable - HUD	\$ 203,594
Accounts receivable - tenants	381,567
Accounts receivable - other government	651,313
Accounts receivable - fraud recovery	106,096
Accounts receivable - miscellaneous	<u>233,484</u>
Total accounts receivable, net	<u>\$ 1,576,054</u>

Accounts receivable - HUD

Accounts receivable - HUD represents amounts due to the Authority for amounts expended under grant agreements that have not been reimbursed as of December 31, 2023. The Authority considers the entire amount to be collectable.

Accounts receivable - tenants

Accounts receivable - tenants represents amounts due for tenant rents and other tenant charges. At December 31, 2023, the balance is shown net of an allowance for doubtful accounts of \$116,368.

Accounts receivable - other government

Accounts receivable - other government consists of amounts due from other housing authorities for portable tenants in the Section 8 Housing Choice Vouchers program and from other governmental agencies for unreimbursed grant expenditures. Management estimates that these amounts are fully collectible and as such, no allowance for doubtful accounts is recorded.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 3. ACCOUNTS RECEIVABLE, NET (continued)

Accounts receivable - fraud recovery

Accounts receivable - fraud recovery, net represents amounts owed from tenants or other program participants who committed fraud or mis-representation and now owe additional rent or retroactive rent. At December 31, 2023, the balance is shown net of an allowance for doubtful accounts of \$6,477.

Accounts receivable - miscellaneous

Accounts receivable - miscellaneous consists of amounts owed from managed properties and other miscellaneous sources from normal ongoing operations. At December 31, 2023, the balance is shown net of an allowance for doubtful accounts of \$540,387.

NOTE 4. RESTRICTED DEPOSITS

Restricted deposits consists of the following as of December 31, 2023:

<u>Cash Category</u>	<u>Amount</u>
Restricted for Modernization and Development	\$ 3,598,541
Operating reserves	761,328
Reserves for replacement	69,674
Family self sufficiency program escrows	596,175
Homeownership escrows	365,151
Tenant security deposits	<u>656,271</u>
Total restricted deposits	<u>\$ 6,047,140</u>

Restricted funds for modernization in the public housing program are restricted for the revitalization and rehabilitation of public housing units.

Operating reserves represent funds that are restricted to cover operating deficits of various projects.

Reserves for replacement represent funds that are restricted for the modernization of public housing units and certain other non-federal units.

Family Self Sufficiency ("FSS") program escrows are restricted for use in the Section 8 Housing Choice Vouchers program by FSS program participants.

Homeownership escrows represent funds that are restricted to cover costs associated with homeownership.

Tenant security deposits represent amounts held in escrow on behalf of tenants to cover any unpaid rent or damages to the Authority owned unit.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 5. CAPITAL ASSETS, NET

The following is a summary of changes in capital assets for the year ended December 31, 2023:

Description	January 1, 2023	Additions	Dispositions	Transfers	December 31, 2023
<u>Non-depreciable capital assets:</u>					
Land	\$ 8,278,584	\$ -	\$ -	\$ -	\$ 8,278,584
Construction in progress	<u>807,011</u>	<u>215,581</u>	<u>-</u>	<u>-</u>	<u>1,022,592</u>
Total	<u>9,085,595</u>	<u>215,581</u>	<u>-</u>	<u>-</u>	<u>9,301,176</u>
<u>Depreciable capital assets:</u>					
Buildings	204,627,633	2,160,592	(93,060)	-	206,695,165
Furniture and equipment	<u>7,118,263</u>	<u>613,312</u>	<u>(7,086)</u>	<u>-</u>	<u>7,724,489</u>
Total	<u>211,745,896</u>	<u>2,773,904</u>	<u>(100,146)</u>	<u>-</u>	<u>214,419,654</u>
Less: accumulated depreciation	<u>188,302,288</u>	<u>3,149,000</u>	<u>(38,842)</u>	<u>-</u>	<u>191,412,446</u>
Net capital assets	<u>\$ 32,529,203</u>	<u>\$ (159,515)</u>	<u>\$ (61,304)</u>	<u>\$ -</u>	<u>\$ 32,308,384</u>

Depreciation expense for the year ended December 31, 2023, amounted to \$3,149,000.

NOTE 6. NOTES RECEIVABLE

The Authority has notes receivable (including accrued interest) related to the redevelopment of affordable housing units at December 31, 2023 in the amount of \$4,474,298. The notes receivable are shown net of an allowance for uncollectable amounts of \$4,474,298 and consist of the following:

Description	Amount
The Authority issued a \$3,881,598 loan to Mercy Timbercreek, LLC (the "LLC"), an affiliated limited liability company, to assist in the development of a low-to-moderate income housing complex known as Timbercreek Apartments. The principal amount and any unpaid accrued interest are payable only from net available cash flows of the LLC, as defined in the repayment agreement, with any outstanding principal and accrued interest due upon maturity. The note is secured by a deed of trust on the property, which is subordinate to a senior mortgage on the property.	\$ 3,881,598
The second mortgage notes consist of mortgages due from homeowners. These mortgages do not bear interest and are forgiven over the lives of the loans as long as the homeowners meet the home ownership program requirements. They are secured by the underlying property	<u>592,700</u>
Total notes receivable	4,474,298
Less: allowance for uncollectable amounts	<u>(4,474,298)</u>
Total notes receivable, net	<u>\$ -</u>

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 7. LEASES RECEIVABLE

On April 9, 2018, the Authority entered into a lease agreement as a lessor with T-Mobile Central, LLC for the lease of rooftop space on Evans Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for one additional five (5) year term. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$2,000, increasing by 10% at the beginning of the renewal term. For the year ended December 31, 2023, the Authority received principal payments of \$20,938 on the lease. As of December 31, 2023, the value of the lease receivable was \$104,875. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$89,537. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$20,662 and \$4,662, respectively.

In December 2015, the Authority entered into a lease agreement as a lessor with Omaha Cellular Telephone Company d/b/a Verizon Wireless for the lease of rooftop space on Florence Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for five (5) additional five (5) year terms. As of December 31, 2023, the value of the lease receivable was \$601,558. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$2,373, increasing by 3% each year. For the year ended December 31, 2023, the Authority received principal payments of \$6,091 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$540,825. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$24,676 and \$24,196, respectively.

In December 2014, the Authority entered into a lease agreement as a lessor with Omaha Cellular Telephone Company d/b/a Verizon Wireless for the lease of rooftop space on Benson Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for five (5) additional five (5) year terms. As of December 31, 2023, the value of the lease receivable was \$594,294. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$2,373, increasing by 3% each year. For the year ended December 31, 2023, the Authority received principal payments of \$7,264 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$516,623. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$24,699 and \$23,932, respectively.

On July 7, 2017, the Authority entered into a lease agreement as a lessor with T-Mobile Central, LLC for the lease of rooftop space on Benson Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for one additional five (5) year term. As of December 31, 2023, the value of the lease receivable was \$87,997. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$2,000, increasing by 10% at the beginning of the renewal term. For the year ended December 31, 2023, the Authority received principal payments of \$22,392 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$74,016. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$20,656 and \$4,008, respectively.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 7. LEASES RECEIVABLE (continued)

On July 7, 2017, the Authority entered into a lease agreement as a lessor with T-Mobile Central, LLC for the lease of rooftop space on Crown Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for one additional five (5) year term. As of December 31, 2023, the value of the lease receivable was \$87,997. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$2,000, increasing by 10% at the beginning of the renewal term. For the year ended December 31, 2023, the Authority received principal payments of \$22,392 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$74,016. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$20,656 and \$4,008, respectively.

On July 7, 2017, the Authority entered into a lease agreement as a lessor with Omaha Cellular Telephone Company d/b/a Verizon Wireless for the lease of rooftop space on Pine Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for four (4) additional five (5) year terms. As of December 31, 2023, the value of the lease receivable was \$363,833. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$1,833, increasing by 10% at the beginning of each renewal term. For the year ended December 31, 2023, the Authority received principal payments of \$9,441 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$303,752. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$16,345 and \$14,759, respectively.

On April 6, 2005, the Authority entered into a lease agreement as a lessor with OUSCOC of Greater Iowa, Inc. a Pennsylvania corporation, d/b/a US Cellular, Inc. for the lease of rooftop space on Crown Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for four (4) additional five (5) year terms. As of December 31, 2023, the value of the lease receivable was \$167,601. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$1,706 for the first fifteen (15) years, increasing to \$2,156 for the next five (5) years and finally increasing to \$2,604 for the remaining five (5) years. For the year ended December 31, 2023, the Authority received principal payments of \$18,759 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$90,836. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$14,343 and \$7,113, respectively.

On November 27, 2006, the Authority entered into a lease agreement as a lessor with Sprint Spectrum, LP for the lease of rooftop space on Kay Jay Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for four (4) additional five (5) year terms. As of December 31, 2023, the value of the lease receivable was \$199,054. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$1,700 for the first five (5) years, increasing to \$2,040 for the next five (5) years and finally increasing to \$2,448 for the remaining fifteen (15) years. For the year ended December 31, 2023, the Authority received principal payments of \$20,957 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$128,255. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$16,201 and \$8,419, respectively.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 7. LEASES RECEIVABLE (continued)

In August 2002, the Authority entered into a lease agreement as a lessor with USCOC of Greater Iowa, d/b/a US Cellular, Inc. for the lease of rooftop space on Florence Tower. The term of the lease was for twenty-five (25) years from the commencement date. As of December 31, 2023, the value of the lease receivable was \$110,492. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$1,706 for the first fifteen (15) years which was increased to \$1,806 during year eleven (11), increasing to \$2,256 for the next five (5) years and finally increasing to \$2,604 for the remaining five (5) years. For the year ended December 31, 2023, the Authority received principal payments of \$27,430 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$53,804. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$14,674 and \$5,018, respectively.

In May 2013, the Authority entered into a lease agreement as a lessor with New Cingular Wireless PCS, LLC for the lease of rooftop space on Underwood Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for four (4) additional five (5) year terms. As of December 31, 2023, the value of the lease receivable was \$345,718. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$1,600 increasing 3% every year. For the year ended December 31, 2023, the Authority received principal payments of \$11,409 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$239,943. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$16,644 and \$14,081, respectively.

In November 2006, the Authority entered into a lease agreement as a lessor with Sprint Spectrum, LP for the lease of rooftop space on Pine Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for four (4) additional five (5) year terms. As of December 31, 2023, the value of the lease receivable was \$200,833. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$1,700 for the first five (5) years, increasing by 10% every five (5) years, increasing to \$2,040 for the next five (5) years and finally increasing to \$2,448 for the remaining fifteen (15) years. For the year ended December 31, 2023, the Authority received principal payments of \$20,887 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$129,550. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$16,194 and \$8,489, respectively.

Total lease receivable	\$ 2,864,252
Less: current portion	<u>199,101</u>
Lease receivable, net of current portion	<u>\$ 2,665,151</u>

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 8. COMPENSATED ABSENCES

Accrued compensated absences represents the amount of accumulated leave for which employees are entitled to receive payment in accordance with the Authority's Personnel Policy. Employees accrue compensated absences according to the following schedule:

<u>Years of Service</u>	<u>Number of Days</u>
1-4	1 working day per month
5-10	1 1/2 working days per month
11-19	1 2/3 working days per month
20 and over	2 working days per month

Employees are allowed to carry over thirty-five days into the subsequent year. Employees accrue sick days at the rate of 8 hours per month. Upon termination, employees with thirteen to seventeen years of service will be paid 25% of sick time to a maximum of 240 hours. At eighteen years of service or upon death, employees will be paid 50% of sick time to a maximum of 240 hours

Compensated absences activity for the year ended December 31, 2023 consisted of the following:

<u>Description</u>	<u>Amount</u>
Beginning compensated absences	\$ 594,220
Compensated absences earned	275,510
Compensated absences redeemed	<u>(149,937)</u>
Ending compensated absences	719,793
Less: current portion	<u>-</u>
Compensated absences, non-current	<u><u>\$ 719,793</u></u>

NOTE 9. LONG-TERM DEBT

Long-term debt consisted of the following as of December 31, 2023:

<u>Description</u>	<u>Amount</u>
The Authority entered into a CDBG loan with the City of Omaha, in the original principal amount of \$102,000. The loan is collateralized by a security interest in 1234 South 13th St. LLC. The loan is non-interest bearing with monthly payments of \$238 which began in January 2021. The loan matures in January 2051.	\$ 102,000
The Authority has entered into a CDBG mortgage note payable with the City of Omaha Planning Department, in the original amount of \$400,000. The loan is secured by Omaha Crown Limited Partnership I property and equipment. The loan bears interest at 1% per annum with monthly payments of \$1,287, maturing in December 2047.	400,000

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 9. LONG-TERM DEBT (continued)

The Authority has entered into a HOME Loan with the City of Omaha, Nebraska, in the original amount of \$300,000. The loan is collateralized by a security interest in 1613 Farnam St. LLC and is non-interest bearing. The loan has monthly payments of \$833 which began in January 2021 and will mature on December 1, 2050.

300,000

The Authority entered into a note payable with First National Bank in the original amount of \$200,000. The note is secured by an interest in the central office building and bears interest at 5.50% per annum. The note has monthly payments of \$1,715 and was paid off on June 1, 2023.

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The Authority has entered into a note payable with Access Bank, in the original amount of \$1,760,000. The note is secured by an interest in the central office building and bears interest at 4.71% per annum. The note has monthly payments of \$10,063, with a balloon payment due at maturity in the amount of \$1,301,425. The note matures on August 2, 2028.

1,537,065

The Authority has entered into a note payable with Bank of the West. The note is secured by an interest in the Omaha Crown II building and is non-interest bearing. The note was due in full in 2018. The loan was paid off in full during 2023.

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Total long-term debt
Less: current portion

2,339,065
48,168

Total long-term debt, net

\$ 2,290,897

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 9. LONG-TERM DEBT (continued)

Annual debt service for principal over the next five years and in five-year increments thereafter is as follows:

<u>Year</u>	<u>Principal</u>	<u>Interest</u>	<u>Total</u>
2024	\$ 48,168	\$ 72,593	\$ 120,761
2025	50,727	70,034	120,761
2026	53,203	67,558	120,761
2027	55,800	64,961	120,761
2028	1,329,167	41,921	1,371,088
2029-2033	-	-	-
2034-2038	-	-	-
2039-2043	-	-	-
2044-2048	400,000	26,900	426,900
2049-2051	<u>402,000</u>	<u>4,000</u>	<u>406,000</u>
	<u>\$ 2,339,065</u>	<u>\$ 347,967</u>	<u>\$ 2,687,032</u>

NOTE 10. OTHER CURRENT AND NON-CURRENT LIABILITIES

Other current and non-current liabilities for the year ended December 31, 2023 consist of the following:

<u>Description</u>	<u>Balance at January 1, 2023</u>	<u>Additions</u>	<u>Deletions</u>	<u>Balance at December 31, 2023</u>	<u>Due within one year</u>
Notes payable	\$ 2,415,890	\$ -	\$ (76,825)	\$ 2,339,065	\$ 48,168
Accrued compensated absences	594,220	275,510	(149,937)	719,793	-
Homeownership reserves	395,956	-	(33,757)	362,199	-
FSS Escrows	567,966	-	(28,114)	539,852	-
Other liabilities	<u>169,730</u>	<u>313,282</u>	<u>(169,730)</u>	<u>313,282</u>	<u>313,282</u>
Total	<u>\$ 4,143,762</u>	<u>\$ 588,792</u>	<u>\$ (458,363)</u>	<u>\$ 4,274,191</u>	<u>\$ 361,450</u>

NOTE 11. RESTRICTED NET POSITION

Restricted net position consists of the following at December 31, 2023:

<u>Description</u>	<u>Amount</u>
Restricted for modernization	\$ 3,598,541
Reserves for replacement	69,674
Operating reserves	<u>761,328</u>
Total restricted net position	<u>\$ 4,429,543</u>

Restricted funds for modernization in the public housing program are restricted for the revitalization and rehabilitation of public housing units.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 11. RESTRICTED NET POSITION (continued)

Reserves for replacement are restricted for use in the tax credit entities, for modernization of existing public housing units and / or development of new public housing units.

Operating reserves represent funds that are restricted in the case the project or program encounters an operating deficit.

NOTE 12. CONDENSED FINANCIAL INFORMATION FOR THE BLENDED COMPONENT UNITS

	Housing in Omaha, Inc.	North Omaha Affordable Housing Limited Partnership	1234 South 13th Street Limited Liability Company	Omaha Crown Limited Partnership II	1613 Farnam Street Limited Liability Company
Assets:					
Current assets	\$ 3,075,608	\$ 29,432	\$ 98,221	\$ 49,744	\$ 23,579
Capital assets, net	394,389	747,937	48,367	199,992	254,546
Other non-current assets	<u>3,976,606</u>	<u>300,750</u>	<u>1,510</u>	<u>1,510</u>	<u>1,510</u>
Total assets	<u>7,446,603</u>	<u>1,078,119</u>	<u>148,098</u>	<u>251,246</u>	<u>279,635</u>
Liabilities:					
Current	-	810,981	695,611	269,987	2,488,951
Non-current	<u>-</u>	<u>893,253</u>	<u>320,210</u>	<u>164,014</u>	<u>853,588</u>
Total liabilities	<u>-</u>	<u>1,704,234</u>	<u>1,015,821</u>	<u>434,001</u>	<u>3,342,539</u>
Net Position:					
Net investment in capital assets	394,389	(145,316)	(261,789)	38,429	(598,534)
Restricted	-	299,662	-	-	-
Unrestricted	<u>7,052,214</u>	<u>(780,461)</u>	<u>(605,934)</u>	<u>(221,184)</u>	<u>(2,464,370)</u>
Net position	<u>\$ 7,446,603</u>	<u>\$ (626,115)</u>	<u>\$ (867,723)</u>	<u>\$ (182,755)</u>	<u>\$ (3,062,904)</u>
	Strehlow Housing Partners Limited Partnership	Omaha Crown Limited Partnership I	Securities Building Limited Partnership	Keystone Crown I, LP	Total Blended Component Units
Assets:					
Current assets	\$ 36,513	\$ 81,240	\$ 114,375	\$ 116,176	\$ 3,624,888
Capital assets, net	2,606,688	246,029	-	2,022,771	6,520,719
Other non-current assets	<u>341,139</u>	<u>-</u>	<u>171,924</u>	<u>-</u>	<u>4,794,949</u>
Total assets	<u>2,984,340</u>	<u>327,269</u>	<u>286,299</u>	<u>2,138,947</u>	<u>14,940,556</u>
Liabilities:					
Current	4,104,869	375,771	(218)	2,102,160	10,848,112
Non-current	<u>2,178,171</u>	<u>642,478</u>	<u>-</u>	<u>2,356,092</u>	<u>7,407,806</u>
Total liabilities	<u>6,283,040</u>	<u>1,018,249</u>	<u>(218)</u>	<u>4,458,252</u>	<u>18,255,918</u>
Net Position:					
Net investment in capital assets	452,688	(395,513)	-	(327,229)	(842,875)
Restricted	340,385	-	-	-	640,047
Unrestricted	<u>(4,091,773)</u>	<u>(295,467)</u>	<u>286,517</u>	<u>(1,992,076)</u>	<u>(3,112,534)</u>
Net position	<u>\$ (3,298,700)</u>	<u>\$ (690,980)</u>	<u>\$ 286,517</u>	<u>\$ (2,319,305)</u>	<u>\$ (3,315,362)</u>

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 12. CONDENSED FINANCIAL INFORMATION FOR THE BLENDED COMPONENT UNITS (continued)

	Housing in Omaha, Inc.	North Omaha Affordable Housing Limited Partnership	1234 South 13th Street Limited Liability Company	Omaha Crown Limited Partnership II	1613 Farnam Street Limited Liability Company
Operating revenues:					
Tenant revenue	\$ (2)	\$ 247,265	\$ 125,562	\$ 84,394	\$ 201,690
Other revenues	<u>206,219</u>	<u>100</u>	<u>41,685</u>	<u>1,010</u>	<u>98,802</u>
Total operating revenues	<u>206,217</u>	<u>247,365</u>	<u>167,247</u>	<u>85,404</u>	<u>300,492</u>
Operating expenses:					
Administrative	1,393	32,453	33,421	27,637	88,385
Maintenance, utilities, and taxes	-	127,114	90,417	41,510	145,785
Depreciation	31,390	173,620	11,262	43,961	49,588
Other	<u>20,537</u>	<u>50,678</u>	<u>33,241</u>	<u>21,566</u>	<u>89,796</u>
Total operating expenses	<u>53,320</u>	<u>383,865</u>	<u>168,341</u>	<u>134,674</u>	<u>373,554</u>
Other income (expense)					
Interest income	-	1,185	-	-	-
Interest expense	<u>-</u>	<u>(6,517)</u>	<u>(1,099)</u>	<u>(1,209)</u>	<u>(3,645)</u>
Net other expense	<u>-</u>	<u>(5,332)</u>	<u>(1,099)</u>	<u>(1,209)</u>	<u>(3,645)</u>
Net income (loss)	<u>\$ 152,897</u>	<u>\$ (141,832)</u>	<u>\$ (2,193)</u>	<u>\$ (50,479)</u>	<u>\$ (76,707)</u>
	Strehlow Housing Partners Limited Partnership	Omaha Crown Limited Partnership I	Securities Building Limited Partnership	Keystone Crown I, LP	Total Blended Component Unit
Operating revenues:					
Tenant revenue	\$ 536,624	\$ 132,000	\$ 102,957	\$ 277,883	\$ 1,708,373
Other revenues	<u>3,534</u>	<u>2,997</u>	<u>89</u>	<u>150</u>	<u>354,586</u>
Total operating revenues	<u>540,158</u>	<u>134,997</u>	<u>103,046</u>	<u>278,033</u>	<u>2,062,959</u>
Operating expenses:					
Administrative	135,389	30,067	2,661	23,390	374,796
Maintenance, utilities, and taxes	387,214	79,299	133	136,025	1,007,497
Depreciation	218,961	5,903	-	199,319	734,004
Other	<u>171,822</u>	<u>42,627</u>	<u>(9,235)</u>	<u>74,722</u>	<u>495,754</u>
Total operating expenses	<u>913,386</u>	<u>157,896</u>	<u>(6,441)</u>	<u>433,456</u>	<u>2,612,051</u>
Other income (expense)					
Interest income	7,290	-	-	-	8,475
Interest expense	<u>(4,470)</u>	<u>(1,914)</u>	<u>-</u>	<u>(31,643)</u>	<u>(50,497)</u>
Net other expense	<u>2,820</u>	<u>(1,914)</u>	<u>-</u>	<u>(31,643)</u>	<u>(42,022)</u>
Net income (loss)	<u>\$ (370,408)</u>	<u>\$ (24,813)</u>	<u>\$ 109,487</u>	<u>\$ (187,066)</u>	<u>\$ (591,114)</u>

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 13. GAIN ON SALE OF CAPITAL ASSETS

During the year ended December 31, 2023, the Authority sold three (3) building properties with proceeds totaling \$517,000. The Authority recorded a gain of \$488,881 on the sale of these properties.

NOTE 14. DEFINED CONTRIBUTION PENSION PLAN

The Authority has a governmental 457(b) deferred compensation plan administered by Empower. A 457 (b) deferred compensation plan is a retirement savings plan that allows eligible employees to supplement any existing retirement and pension benefits by saving and investing before-tax dollars through a voluntary salary contribution. Contributions and any earnings on contributions are tax-deferred until money is withdrawn. Distributions are subject to ordinary income tax. The Authority does not contribute to this plan.

The Authority contributes to a 401-a defined contribution plan administered by the Authority. A defined contribution plan provides the opportunity to save for retirement on a tax-advantaged basis. Under a defined contribution plan, the benefits a participant will receive depend solely on the amount contributed to the participant's account, the return earned on investments of those contributions, and forfeitures of other participants' benefits that may be allocated to such participant's account. All regular, full-time, eligible employees, including unionized employees, of the Authority may participate in the pension plan starting four (4) months after date of hire. Employees are required to contribute 5.50% of their compensation and will be vested as follows:

- 1 year employed - 50% vested
- 2 years employed - 60% vested
- 3 years employed - 70% vested
- 4 years employed - 100% vested

During the year, the Authority's required and actual contributions amounted to \$515,174. Employees' required contributions amounted to \$515,161. Employees' voluntary contributions amounted to \$80,455.

NOTE 15. RISK MANAGEMENT

The Authority is exposed to various risks related to torts; theft of, damage to and destruction of assets; errors and omissions; injuries to employees; and natural disasters. Significant losses are covered by commercial insurance for all major programs, and there have been no significant reductions in insurance coverage. Claims expenditures and liabilities are reported when it is probable that a loss has occurred, the amount of the loss can be reasonably estimated, and said amount exceeds insurance coverage. Settlement amounts have not exceeded insurance coverage for the last three years.

NOTE 16. CONTINGENCIES

The Authority receives financial assistance from HUD in the form of grants and subsidies. Entitlement to the funds is generally conditional upon compliance with terms and conditions of the grant agreements and applicable regulations, including the expenditure of funds for eligible purposes. Substantially all grants, entitlements and cost reimbursements are subject to financial and compliance audits by HUD. As a result of these audits, costs previously reimbursed could be disallowed and require payments to HUD.

As of December 31, 2023, the Authority estimates that no material liabilities will result from such audits.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 17. SUBSEQUENT EVENTS

Events that occur after the financial statement date but before the financial statements were available to be issued must be evaluated for recognition or disclosure. The effects of subsequent events that provide evidence about conditions that existed at the financial statement date are recognized in the accompanying financial statements. Subsequent events which provide evidence about conditions that existed after the financial statement date require disclosure in the accompanying notes to the financial statements. Management evaluated the activity of the Authority through September 19, 2024 (the date the financial statements were available to be issued) and concluded that no subsequent events have occurred that would require recognition in the financial statements or disclosure in the notes to the financial statements.

**INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL OVER
FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS
BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN
ACCORDANCE WITH *GOVERNMENT AUDITING STANDARDS***

To the Board of Commissioners
Housing Authority of the City of Omaha, Nebraska:

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the Housing Authority of the City of Omaha, Nebraska (the "Authority") as of and for the year ended December 31, 2023, and the related notes to the financial statements, which collectively comprise the Authority's financial statements, and have issued our report thereon dated September 19, 2024.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Authority's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. We identified certain deficiencies in internal control, described in the accompanying schedule of findings and questioned costs as Finding 2023-001 that we consider to be a material weakness.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Authority's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Authority's Response to Findings

Government Auditing Standards requires the auditor to perform limited procedures on the Authority's response to the findings identified in our engagement and described in the accompanying schedule of findings and questioned costs. The Authority's response was not subjected to the other auditing procedures applied in the engagement to audit the financial statements and, accordingly, we express no opinion on the response.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Novogradac & Company LLP

September 19, 2024
Toms River, New Jersey

**INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR EACH
MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE
REQUIRED BY THE UNIFORM GUIDANCE**

To the Board of Commissioners
Housing Authority of the City of Omaha, Nebraska:

Report on Compliance for Each Major Federal Program

Opinion on Each Major Federal Program

We have audited the Housing Authority of the City of Omaha, Nebraska's (the "Authority") compliance with the types of compliance requirements described in the OMB Compliance Supplement that could have a direct and material effect on each of the Authority's major federal programs for the year ended December 31, 2023. The Authority's major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs.

In our opinion, the Authority complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended December 31, 2023.

Basis for Opinion on Each Major Federal Program

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditor's Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of the Authority and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on compliance for each major federal program. Our audit does not provide a legal determination of the Authority's compliance with the compliance requirements referred to above.

Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules, and provisions of contracts or grant agreements applicable to the Authority's federal programs.

Auditors' Responsibilities for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on the Authority's compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about the Authority's compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the Authority's compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- Obtain an understanding of the Authority's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

Other Matters

The results of our auditing procedures disclosed instances of noncompliance which are required to be reported in accordance with the Uniform Guidance and which are described in the accompanying schedule of findings and questioned costs as items 2023-002 and 2023-003. Our opinion on the major federal program is not modified with respect to these matters.

Report on Internal Control over Compliance

Our consideration of internal control over compliance was for the limited purpose described in the Auditors' Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance and therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as discussed below, we did identify deficiencies in internal control over compliance that we consider to be significant deficiencies.

Report on Internal Control over Compliance (continued)

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis.

A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance. We consider the deficiencies in internal control over compliance described in the accompanying schedule of findings and questioned costs as items 2023-002 and 2023-003 to be significant deficiencies.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed.

Authority's Response to Findings

Government Auditing Standards requires the auditor to perform limited procedures on the Authority's response to the internal control over compliance findings identified in our audit described in the accompanying schedule of findings and questioned costs. The Authority's response was not subjected to other auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

Purpose of this Report

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

Novogradac & Company LLP

September 19, 2024
Toms River, New Jersey

SUPPLEMENTARY INFORMATION

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
YEAR ENDED DECEMBER 31, 2023

<u>Federal Grantor/Program Title</u>	<u>Federal AL Number</u>	<u>Total Expenditures</u>
<u>U.S. Department of Housing and Urban Development</u>		
Housing Voucher Cluster:		
Section 8 Housing Choice Vouchers	14.871	\$ 40,919,431
Mainstream Vouchers	14.879	826,995
Emergency Housing Vouchers	14.EHV	<u>1,007,568</u>
Total Housing Voucher Cluster		42,753,994
Section 8 Project Based Cluster:		
Lower Income Housing Assistance Program - Section 8 Moderate Rehabilitation	14.856	<u>546,513</u>
Total Section 8 Project Based Cluster		546,513
Public and Indian Housing Program	14.850	8,909,610
Public Housing Capital Fund	14.872	7,792,279
Resident Opportunity and Supportive Services	14.870	272,106
Family Self Sufficiency Program	14.896	<u>426,972</u>
Subtotal U.S. Department of Housing and Urban Development - Direct		<u>60,701,474</u>
U.S. Department of Housing and Urban Development		
Passed through the City of Omaha -		
Planning Department:		
HOME Investment Partnerships Program	14.239	<u>175,836</u>
Passed through the City of Omaha:		
Choice Neighborhood Implementation Grant	14.889	869,875
Community Development Block Grant / Entitlement Grants	14.218	<u>3,500</u>
Total passed through the City of Omaha		873,375
Subtotal U.S. Department of Housing and Urban Development - Pass-through		<u>1,049,211</u>
Total Expenditures of Federal Awards		<u>\$ 61,750,685</u>

See accompanying notes to Schedule of Expenditures of Federal Awards.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
YEAR ENDED DECEMBER 31, 2023

NOTE 1. BASIS OF PRESENTATION

The accompanying Schedule of Expenditures of Federal Awards (the "Schedule") includes the federal grant activity of Housing Authority of the City of Omaha, Nebraska under programs of the federal government for the year ended December 31, 2023. The information in the Schedule is presented in accordance with the requirements of Title 2 *U.S. Code of Federal Regulations Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Because the Schedule presents only a selected portion of operations of the Housing Authority of the City of Omaha, Nebraska, it is not intended to and does not present the financial position, changes in net position or cash flows of the Housing Authority of the City of Omaha, Nebraska.

NOTE 2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Expenditures reported on the Schedule are reported on the accrual basis of accounting. Such expenditures are recognized following the principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement.

NOTE 3. INDIRECT COST RATE

The Authority has elected not to use the 10-percent de minimis indirect cost rate allowed under the Uniform Guidance.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 4. SCHEDULE OF CAPITAL FUND PROGRAM COSTS AND ADVANCES

The total amounts of Capital Fund Program Costs and Advances incurred and earned by the Housing Authority of the City of Omaha, Nebraska as of and for the year ended December 31, 2023 are provided herein:

	<u>501-15</u>	<u>501-16</u>	<u>501-17</u>	<u>501-18</u>	<u>501-19</u>	<u>L501-19</u>	<u>501-20</u>	<u>501-21</u>
Budget	\$ <u>2,971,181</u>	\$ <u>3,327,129</u>	\$ <u>3,443,493</u>	\$ <u>5,366,997</u>	\$ <u>5,612,511</u>	\$ <u>660,000</u>	\$ <u>6,017,802</u>	\$ <u>5,808,517</u>
<u>Advances:</u>								
Cumulative through 12/31/22	\$ -	\$ 3,192,436	\$ 3,354,514	\$ 5,346,820	\$ 5,527,176	\$ 9,892	\$ 3,891,764	\$ 3,474,032
Current Year	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>85,335</u>	<u>220,665</u>	<u>1,802,562</u>	<u>2,196,586</u>
Cumulative through 12/31/23	<u>-</u>	<u>3,192,436</u>	<u>3,354,514</u>	<u>5,346,820</u>	<u>5,612,511</u>	<u>230,557</u>	<u>5,694,326</u>	<u>5,670,618</u>
<u>Costs:</u>								
Cumulative through 12/31/22	-	3,192,436	3,354,514	5,346,820	5,527,176	9,892	3,891,764	3,474,032
Current Year	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>85,335</u>	<u>220,665</u>	<u>1,802,562</u>	<u>2,196,586</u>
Cumulative through 12/31/23	<u>-</u>	<u>3,192,436</u>	<u>3,354,514</u>	<u>5,346,820</u>	<u>5,612,511</u>	<u>230,557</u>	<u>5,694,326</u>	<u>5,670,618</u>
Excess / (Deficiency)	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>
	<u>R501-12</u>	<u>R501-13</u>	<u>R501-14</u>	<u>R501-15</u>	<u>R502-12</u>	<u>R502-13</u>	<u>R502-14</u>	<u>E501-20</u>
Budget	\$ <u>224,018</u>	\$ <u>242,493</u>	\$ <u>231,173</u>	\$ <u>235,754</u>	\$ <u>131,087</u>	\$ <u>113,749</u>	\$ <u>132,983</u>	\$ <u>227,273</u>
<u>Advances:</u>								
Cumulative through 12/31/22	\$ 223,122	\$ 242,493	\$ 231,173	\$ 235,754	\$ -	\$ 113,749	\$ 132,983	\$ 154,774
Current Year	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>72,499</u>
Cumulative through 12/31/23	<u>223,122</u>	<u>242,493</u>	<u>231,173</u>	<u>235,754</u>	<u>-</u>	<u>113,749</u>	<u>132,983</u>	<u>227,273</u>
<u>Costs:</u>								
Cumulative through 12/31/22	223,122	242,493	231,173	235,754	-	113,749	132,983	154,774
Current Year	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>72,499</u>
Cumulative through 12/31/23	<u>223,122</u>	<u>242,493</u>	<u>231,173</u>	<u>235,754</u>	<u>-</u>	<u>113,749</u>	<u>132,983</u>	<u>227,273</u>
Excess / (Deficiency)	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 4. SCHEDULE OF CAPITAL FUND PROGRAM COSTS AND ADVANCES (continued)

	<u>E501-21</u>	<u>501-22</u>	<u>501-23</u>	<u>Totals</u>
Budget	\$ <u>247,000</u>	\$ <u>7,139,851</u>	\$ <u>7,195,791</u>	\$ <u>42,188,951</u>
<u>Advances:</u>				
Cumulative through 12/31/22	\$ 63,547	\$ 63,547	\$ -	\$ 26,257,776
Current Year	<u>82,983</u>	<u>821,030</u>	<u>2,510,619</u>	<u>7,792,279</u>
Cumulative through 12/31/23	<u>146,530</u>	<u>884,577</u>	<u>2,510,619</u>	<u>34,050,055</u>
<u>Costs:</u>				
Cumulative through 12/31/22	63,547	63,547	-	26,257,776
Current Year	<u>82,983</u>	<u>821,030</u>	<u>2,510,619</u>	<u>7,792,279</u>
Cumulative through 12/31/23	<u>146,530</u>	<u>884,577</u>	<u>2,510,619</u>	<u>34,050,055</u>
Excess / (Deficiency)	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>

During the year ended December 31, 2023, Capital Fund Grant NE26P001501-19 with approved funding of \$5,612,511 had been fully drawn down and expended as per Capital Fund Grant Regulations.

During the year ended December 31, 2023, Capital Fund Grant NE26E001501-20 with approved funding of \$227,273 had been fully drawn down and expended as per Capital Fund Grant Regulations.

In addition, prior to the year ended December 31, 2023, Replacement Housing Factor Grants NE26R001501-13, NE26R001501-14, NE26R001501-15, NE26R001502-13, and NE26R001502-14 with approved funding of \$242,493, \$231,173, \$235,754, \$113,749, and \$132,983, respectively, had been fully drawn down and expended as per Capital Fund Grant Regulations.

**HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED DECEMBER 31, 2023**

I. Summary of Auditors' Results

Financial Statements

1.	Type of auditors' report issued:	Unmodified
2.	Internal control over financial reporting	
a.	Material weakness(es) identified?	Yes
b.	Significant deficiency(ies) identified?	None reported
3.	Noncompliance material to the financial statements?	No

Federal Awards

1.	Internal control over compliance:	
a.	Material weakness(es) identified?	No
b.	Significant deficiency(ies) identified?	Yes
2.	Type of auditors' report on compliance for major programs:	Unmodified
3.	Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)?	Yes
4.	Identification of major program:	

<u>ALN Number</u>	<u>Name of Federal Program</u>
14.871	Housing Voucher Cluster
14.879	Housing Choice Voucher Program
14.EHV	Mainstream Program
	Emergency Housing Vouchers Program
14.850	Public and Indian Housing Program
14.872	Public Housing Capital Fund Program

5.	Dollar threshold used to distinguish between Type A and Type B Programs:	\$1,852,521
6.	Auditee qualified as low-risk Auditee?	No

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (continued)
FOR THE YEAR ENDED DECEMBER 31, 2023

II. Financial Statement Findings

Finding 2023-001

Statement of condition: The unaudited account balances of cash, accounts receivable, construction in progress, inter-program loans, accrued interest payable, accounts payable, other current liabilities, and noncurrent liabilities were misstated. In addition, there were numerous journal entries proposed during the audit.

Criteria: The Authority must ensure that proper internal controls are in place to initiate, authorize, record, process and report financial data reliably in accordance with generally accepted accounting principles.

Condition: There is a reasonable possibility that a misstatement of the Authority's financial statements will not be prevented or detected by the Authority's internal control.

Cause: Controls are not in place to ensure the Authority records and reports financial data reliably in accordance with generally accepted accounting principles.

Recommendation: The Authority should ensure proper internal controls, which include timely monthly reconciliations of account balances, are in place to prevent material weaknesses from occurring.

Authority Response: Auditee agrees with the auditor and management will be responsible for implementing the corrective action plan.

III. Federal Award Findings and Questioned Costs

Finding 2023-002

Federal Agency: U.S. Department of Housing and Urban Development
Federal Program Titles: Section 8 Housing Choice Vouchers Program,
Federal Catalog Numbers: 14.871
Noncompliance - E - Eligibility
Non Compliance Material to the Financial Statements: No
Significant Deficiency in Internal Control over Compliance

Criteria: Tenant Files. The PHA must do the following: As a condition of admission or continued occupancy, require the tenant and other family member to provide necessary information, documentation, and releases for the PHA to verify income eligibility (24 CFR sections 5.230, 5.609, and 982.516).

Condition: Based upon inspection of the Authority's files and on discussion with management, there were documents that were unavailable for examination at the time of audit.

Context: Of a sample size of forty-three (43) tenant files, the following information was unavailable for examination at the time of audit:

- (3) Verification of Income
- (2) Verification of Assets
- (1) HUD Form 50058

Our sample size is statistically valid.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (continued)
FOR THE YEAR ENDED DECEMBER 31, 2023

III. Federal Award Findings and Questioned Costs (continued)

Finding 2023-002 (continued)

Known Questioned Costs: 7,162

Cause: There is a significant deficiency in internal controls over the compliance for the eligibility type of compliance related to the maintenance of tenant files. The Authority has not properly considered, designed, implemented, maintained and monitored a system of internal controls that reasonably assures the program is in compliance.

Effect: The Section 8 Housing Choice Voucher Program is in non-compliance with the eligibility type of compliance requirements of the program.

Recommendation: We recommend the Authority design and implement internal control procedures that will reasonably assure compliance with the Uniform Guidance and the compliance supplement.

View of Responsible Officials and Corrective Actions: The Authority accepts the recommendation of the auditor. The Authority will increase oversight in the Section 8 Housing Choice Vouchers Program to ensure that established internal control policies are being followed on a timely basis.

Finding 2023-003:

Federal Agency: U.S. Department of Housing and Urban Development

Federal Program Titles: Section 8 Housing Choice Vouchers Program

Federal Assistance Listing Numbers: 14.871

Noncompliance – N. Special Tests and Provisions – Housing Quality Standards (HQS) Enforcement

Non Compliance Material to the Financial Statements: No

Significant Deficiency in Internal Control over Compliance for Special Tests and Provisions

Criteria: HQS Enforcement. For units under a HAP contract that fail to meet HQS, the PHA must require the owner to correct all life threatening HQS deficiencies within 24 hours after the inspections and all other deficiencies within 30 days or within a specified PHA-approved extension.

Condition: Based upon inspection of the Authority's files and on discussion with management, the Authority did not properly abate one (1) out of twenty-five (25) annual failed inspections selected for testing.

Context: The Authority did not properly abate one (1) out of twenty-five (25) failed inspections selected for testing. As a result, the Authority was not in compliance with the HQS as required by 24 CFR sections 982.158(d) and 982.405(b).

Known Questioned Costs: \$1,532

Cause: There is a significant deficiency in internal controls over the compliance for the special tests and provisions type of compliance related to HQS enforcement. The Authority has not properly considered, designed, implemented, maintained and monitored a system of internal controls that assures the program is in compliance.

Effect: The Section 8 Housing Choice Vouchers Program is in non-compliance with the special tests and provisions type of compliance related to HQS enforcement.

Recommendation: We recommend the Authority design and implement internal control procedures that will reasonably assure compliance with the Uniform Guidance and the compliance supplement.

**HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (continued)
FOR THE YEAR ENDED DECEMBER 31, 2023**

III. Federal Award Findings and Questioned Costs (continued)

Finding 2023-003 (continued):

View of Responsible Officials and Corrective Actions: The Authority accepts the recommendation of the auditor. The Authority will increase oversight in the Section 8 Housing Choice Vouchers Program to ensure that established internal control policies are being followed on a timely basis.

IV. Summary of Prior Audit Findings

Finding 2022-001

Observation: Several material adjusting journal entries were required in order to reconcile beginning net position to the prior year's audited financial statements.

Status: This finding remains open. See audit Finding 2023-001

Finding 2022-002

Observation: Tenant file documentation was not found during examination of Section 8 Housing Choice Vouchers tenant files.

Status: This finding remains open. See audit Finding 2023-002.

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Balance Sheet Summary

Fiscal Year End: 12/31/2023

	Project Total	14.879 Mainstream Vouchers	14.889 Choice Neighborhoods Implementation Grants	14.239 HOME Investment Partnerships Program	14.238 Shelter Plus Care	14.896 PIH Family Self-Sufficiency Program
111 Cash - Unrestricted	\$3,449,960	\$113,430	\$28,073	\$263,948	\$28,699	\$59,649
112 Cash - Restricted - Modernization and Development	\$3,598,541	\$0	\$0	\$0	\$0	\$0
113 Cash - Other Restricted	\$402,629	\$0	\$0	\$0	\$0	\$0
114 Cash - Tenant Security Deposits	\$519,097	\$0	\$0	\$0	\$0	\$0
115 Cash - Restricted for Payment of Current Liabilities	\$0	\$0	\$0	\$0	\$0	\$0
100 Total Cash	\$7,970,227	\$113,430	\$28,073	\$263,948	\$28,699	\$59,649
121 Accounts Receivable - PHA Projects	\$0	\$0	\$0	\$0	\$0	\$0
122 Accounts Receivable - HUD Other Projects	\$0	\$0	\$0	\$0	\$0	\$0
124 Accounts Receivable - Other Government	\$0	\$0	\$623,613	\$27,398	\$0	\$0
125 Accounts Receivable - Miscellaneous	\$114,745	\$25,909	\$0	\$19,563	\$6,147	\$0
126 Accounts Receivable - Tenants	\$412,993	\$0	\$0	\$362	\$0	\$0
126.1 Allowance for Doubtful Accounts - Tenants	-\$55,999	\$0	\$0	\$0	\$0	\$0
126.2 Allowance for Doubtful Accounts - Other	-\$123,872	\$0	\$0	\$0	\$0	\$0
127 Notes, Loans, & Mortgages Receivable - Current	\$0	\$0	\$0	\$0	\$0	\$0
128 Fraud Recovery	\$52,588	\$0	\$0	\$0	\$0	\$0
128.1 Allowance for Doubtful Accounts - Fraud	-\$6,477	\$0	\$0	\$0	\$0	\$0
129 Accrued Interest Receivable	\$0	\$0	\$0	\$0	\$0	\$0
120 Total Receivables, Net of Allowances for Doubtful Accounts	\$403,978	\$25,909	\$623,613	\$47,323	\$6,147	\$0
131 Investments - Unrestricted	\$0	\$0	\$0	\$0	\$0	\$0
132 Investments - Restricted	\$0	\$0	\$0	\$0	\$0	\$0
135 Investments - Restricted for Payment of Current Liability	\$0	\$0	\$0	\$0	\$0	\$0
142 Prepaid Expenses and Other Assets	\$126,143	\$0	\$30,851	\$883	\$0	\$0
143 Inventories	\$0	\$0	\$0	\$0	\$0	\$0
143.1 Allowance for Obsolete Inventories	\$0	\$0	\$0	\$0	\$0	\$0
144 Inter Program Due From	\$39,649	\$0	\$0	\$0	\$0	\$0
145 Assets Held for Sale	\$10,560	\$0	\$0	\$0	\$0	\$0
150 Total Current Assets	\$8,550,557	\$139,339	\$682,537	\$312,154	\$34,846	\$59,649
161 Land	\$6,470,404	\$0	\$0	\$0	\$0	\$0
162 Buildings	\$168,349,536	\$0	\$0	\$0	\$0	\$0
163 Furniture, Equipment & Machinery - Dwellings	\$4,599,098	\$0	\$0	\$0	\$0	\$0
164 Furniture, Equipment & Machinery - Administration	\$1,802,731	\$0	\$0	\$0	\$0	\$0
165 Leasehold Improvements	\$4,001,802	\$0	\$0	\$0	\$0	\$0
166 Accumulated Depreciation	-\$163,106,334	\$0	\$0	\$0	\$0	\$0
167 Construction in Progress	\$965,361	\$0	\$0	\$0	\$0	\$0
168 Infrastructure	\$0	\$0	\$0	\$0	\$0	\$0
160 Total Capital Assets, Net of Accumulated Depreciation	\$23,082,598	\$0	\$0	\$0	\$0	\$0
171 Notes, Loans and Mortgages Receivable - Non-Current	\$5,967,593	\$0	\$0	\$0	\$0	\$0
172 Notes, Loans, & Mortgages Receivable - Non Current - Past Due	\$0	\$0	\$0	\$0	\$0	\$0
173 Grants Receivable - Non Current	\$0	\$0	\$0	\$0	\$0	\$0
174 Other Assets	\$7,675,690	\$0	\$0	\$0	\$0	\$0
176 Investments in Joint Ventures	\$0	\$0	\$0	\$0	\$0	\$0
180 Total Non-Current Assets	\$36,725,881	\$0	\$0	\$0	\$0	\$0
200 Deferred Outflow of Resources	\$0	\$0	\$0	\$0	\$0	\$0
290 Total Assets and Deferred Outflow of Resources	\$45,276,438	\$139,339	\$682,537	\$312,154	\$34,846	\$59,649

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Balance Sheet Summary

Fiscal Year End: 12/31/2023

	Project Total	14.879 Mainstream Vouchers	14.889 Choice Neighborhoods Implementation Grants	14.239 HOME Investment Partnerships Program	14.238 Shelter Plus Care	14.896 PIH Family Self-Sufficiency Program
311 Bank Overdraft	\$0	\$0	\$0	\$0	\$0	\$0
312 Accounts Payable <= 90 Days	\$617,902	\$0	\$1,600	\$0	\$0	\$1,768
313 Accounts Payable >90 Days Past Due	\$0	\$0	\$0	\$0	\$0	\$0
321 Accrued Wage/Payroll Taxes Payable	\$65,760	\$0	\$6,122	\$0	\$0	\$6,401
322 Accrued Compensated Absences - Current Portion	\$0	\$0	\$0	\$0	\$0	\$0
324 Accrued Contingency Liability	\$0	\$0	\$0	\$0	\$0	\$0
325 Accrued Interest Payable	\$0	\$0	\$0	\$0	\$0	\$0
331 Accounts Payable - HUD PHA Programs	\$0	\$0	\$0	\$0	\$0	\$0
332 Account Payable - PHA Projects	\$0	\$0	\$0	\$0	\$0	\$0
333 Accounts Payable - Other Government	\$0	\$0	\$0	\$0	\$0	\$0
341 Tenant Security Deposits	\$519,097	\$0	\$0	\$0	\$0	\$0
342 Unearned Revenue	\$551,077	\$0	\$0	\$0	\$0	\$0
344 Current Portion of Long-term Debt - Operating Borrowings	\$0	\$0	\$0	\$0	\$0	\$0
344 Current Portion of Long-term Debt - Operating Borrowings	\$0	\$0	\$0	\$0	\$0	\$0
345 Other Current Liabilities	\$261,102	\$0	\$0	\$0	\$0	\$0
346 Accrued Liabilities - Other	\$3,564	\$0	\$0	\$0	\$0	\$0
347 Inter Program - Due To	\$2,981,548	\$10,514	\$719,756	\$239,772	\$0	\$69,812
348 Loan Liability - Current	\$0	\$0	\$0	\$0	\$0	\$0
310 Total Current Liabilities	\$4,720,050	\$10,514	\$727,478	\$239,772	\$0	\$77,981
351 Long-term Debt, Net of Current - Capital Projects/Mortgage Revenue	\$0	\$0	\$0	\$0	\$0	\$0
352 Long-term Debt, Net of Current - Operating Borrowings	\$0	\$0	\$0	\$0	\$0	\$0
353 Non-current Liabilities - Other	\$352,714	\$0	\$0	\$0	\$0	\$0
354 Accrued Compensated Absences - Non Current	\$204,186	\$0	\$16,361	\$0	\$0	\$39,130
355 Loan Liability - Non Current	\$0	\$0	\$0	\$0	\$0	\$0
356 FASB 5 Liabilities	\$0	\$0	\$0	\$0	\$0	\$0
357 Accrued Pension and OPEB Liabilities	\$0	\$0	\$0	\$0	\$0	\$0
350 Total Non-Current Liabilities	\$556,900	\$0	\$16,361	\$0	\$0	\$39,130
300 Total Liabilities	\$5,276,950	\$10,514	\$743,839	\$239,772	\$0	\$117,111
400 Deferred Inflow of Resources	\$2,241,157	\$0	\$0	\$0	\$0	\$0
508.4 Net Investment in Capital Assets	\$23,082,598	\$0	\$0	\$0	\$0	\$0
511.4 Restricted Net Position	\$3,598,541	\$0	\$0	\$0	\$0	\$0
512.4 Unrestricted Net Position	\$11,077,192	\$128,825	-\$61,302	\$72,382	\$34,846	-\$57,462
513 Total Equity - Net Assets / Position	\$37,758,331	\$128,825	-\$61,302	\$72,382	\$34,846	-\$57,462
600 Total Liabilities, Deferred Inflows of Resources and Equity - Net	\$45,276,438	\$139,339	\$682,537	\$312,154	\$34,846	\$59,649

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Balance Sheet Summary

Fiscal Year End: 12/31/2023

	14.870 Resident Opportunity and Supportive Services	14.892 Choice Neighborhoods Planning Grants	1 Business Activities	6.2 Component Unit - Blended	14.871 Housing Choice Vouchers	14.EHV/ Emergency Housing Voucher
111 Cash - Unrestricted	\$42,032	\$27,157	\$96,917	\$781,210	\$1,067,951	\$503,620
112 Cash - Restricted - Modernization and Development	\$0	\$0	\$0	\$0	\$0	
113 Cash - Other Restricted	\$0	\$0	\$190,955	\$640,047	\$558,697	
114 Cash - Tenant Security Deposits	\$0	\$0	\$17,905	\$119,269	\$0	
115 Cash - Restricted for Payment of Current Liabilities	\$0	\$0	\$0	\$0	\$0	
100 Total Cash	\$42,032	\$27,157	\$305,777	\$1,540,526	\$1,626,648	\$503,620
121 Accounts Receivable - PHA Projects	\$0	\$0	\$0	\$0	\$0	
122 Accounts Receivable - HUD Other Projects	\$36,640	\$0	\$0	\$0	\$166,954	
124 Accounts Receivable - Other Government	\$0	\$0	\$0	\$0	\$0	
125 Accounts Receivable - Miscellaneous	\$0	\$302	\$0	\$4,582	\$541,087	\$1,089
126 Accounts Receivable - Tenants	\$0	\$0	\$19,782	\$64,798	\$0	
126.1 Allowance for Doubtful Accounts - Tenants	\$0	\$0	-\$5,015	-\$55,354	\$0	
126.2 Allowance for Doubtful Accounts - Other	\$0	\$0	\$0	\$0	-\$416,515	\$0
127 Notes, Loans, & Mortgages Receivable - Current	\$0	\$0	\$0	\$2,625,492	\$0	
128 Fraud Recovery	\$0	\$0	\$0	\$49,985	\$0	
128.1 Allowance for Doubtful Accounts - Fraud	\$0	\$0	\$0	\$0	\$0	
129 Accrued Interest Receivable	\$0	\$0	\$0	\$0	\$0	
120 Total Receivables, Net of Allowances for Doubtful Accounts	\$36,640	\$302	\$14,767	\$2,689,503	\$291,526	\$1,089
131 Investments - Unrestricted	\$0	\$0	\$0	\$0	\$0	
132 Investments - Restricted	\$0	\$0	\$0	\$0	\$0	
135 Investments - Restricted for Payment of Current Liability	\$0	\$0	\$0	\$0	\$0	
142 Prepaid Expenses and Other Assets	\$5,399	\$0	\$840	\$11,753	\$73,529	\$11,951
143 Inventories	\$0	\$0	\$0	\$0	\$0	
143.1 Allowance for Obsolete Inventories	\$0	\$0	\$0	\$0	\$0	
144 Inter Program Due From	\$0	\$0	\$47,555	\$0	\$48,859	\$5,457
145 Assets Held for Sale	\$0	\$0	\$0	\$0	\$0	
150 Total Current Assets	\$84,071	\$27,459	\$368,939	\$4,241,782	\$2,040,562	\$522,117
161 Land	\$0	\$0	\$2,548	\$1,791,087	\$14,389	
162 Buildings	\$0	\$0	\$27,882	\$30,028,149	\$328,203	
163 Furniture, Equipment & Machinery - Dwellings	\$0	\$0	\$0	\$472,131	\$123,182	
164 Furniture, Equipment & Machinery - Administration	\$0	\$0	\$0	\$126,356	\$2,877	
165 Leasehold Improvements	\$0	\$0	\$0	\$929,034	\$0	
166 Accumulated Depreciation	\$0	\$0	-\$10,811	-\$26,826,038	-\$440,488	
167 Construction in Progress	\$0	\$0	\$0	\$0	\$0	
168 Infrastructure	\$0	\$0	\$0	\$0	\$0	
160 Total Capital Assets, Net of Accumulated Depreciation	\$0	\$0	\$19,619	\$6,520,719	\$28,163	\$0
171 Notes, Loans and Mortgages Receivable - Non-Current	\$0	\$0	\$0	\$594,000	\$0	
172 Notes, Loans, & Mortgages Receivable - Non Current - Past Due	\$0	\$0	\$0	\$0	\$0	
173 Grants Receivable - Non Current	\$0	\$0	\$0	\$0	\$0	
174 Other Assets	\$0	\$0	\$0	\$757,410	\$0	
176 Investments in Joint Ventures	\$0	\$0	\$0	\$2,296,065	\$0	
180 Total Non-Current Assets	\$0	\$0	\$19,619	\$10,168,194	\$28,163	\$0
200 Deferred Outflow of Resources	\$0	\$0	\$0	\$0	\$0	
290 Total Assets and Deferred Outflow of Resources	\$84,071	\$27,459	\$388,558	\$14,409,976	\$2,068,725	\$522,117

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Balance Sheet Summary

Fiscal Year End: 12/31/2023

	14.870 Resident Opportunity and Supportive Services	14.892 Choice Neighborhoods Planning Grants	1 Business Activities	6.2 Component Unit - Blended	14.871 Housing Choice Vouchers	14.EHV/ Emergency Housing Voucher
311 Bank Overdraft	\$0	\$0	\$0	\$0	\$0	
312 Accounts Payable <= 90 Days	\$823	\$0	\$3,852	\$33,297	\$26,915	
313 Accounts Payable >90 Days Past Due	\$0	\$0	\$0	\$0	\$0	
321 Accrued Wage/Payroll Taxes Payable	\$2,795	\$0	\$2,090	\$1,834	\$33,041	
322 Accrued Compensated Absences - Current Portion	\$0	\$0	\$0	\$0	\$0	
324 Accrued Contingency Liability	\$0	\$0	\$0	\$0	\$0	
325 Accrued Interest Payable	\$0	\$0	\$0	\$5,531,699	\$0	
331 Accounts Payable - HUD PHA Programs	\$0	\$0	\$0	\$0	\$0	
332 Account Payable - PHA Projects	\$0	\$0	\$0	\$0	\$0	
333 Accounts Payable - Other Government	\$0	\$0	\$0	\$0	\$0	
341 Tenant Security Deposits	\$0	\$0	\$17,905	\$119,269	\$0	
342 Unearned Revenue	\$0	\$0	\$15,686	\$41,517	\$0	\$0
344 Current Portion of Long-term Debt - Operating Borrowings	\$0	\$0	\$0	\$0	\$0	
344 Current Portion of Long-term Debt - Operating Borrowings	\$0	\$0	\$0	\$2,625,492	\$0	
345 Other Current Liabilities	\$0	\$0	\$0	\$29,927	\$0	
346 Accrued Liabilities - Other	\$0	\$0	\$0	\$0	\$0	
347 Inter Program - Due To	\$84,991	\$27,898	\$135,184	\$1,934,497		\$1,833
348 Loan Liability - Current	\$0	\$0	\$0	\$0	\$0	
310 Total Current Liabilities	\$88,609	\$27,898	\$174,717	\$10,317,532	\$59,956	\$1,833
351 Long-term Debt, Net of Current - Capital Projects/Mortgage Revenue	\$0	\$0	\$0	\$7,363,594	\$0	
352 Long-term Debt, Net of Current - Operating Borrowings	\$0	\$0	\$0	\$0	\$0	
353 Non-current Liabilities - Other	\$0	\$0	\$0	\$9,475	\$539,852	
354 Accrued Compensated Absences - Non Current	\$10,682	\$0	\$0	\$34,737	\$120,102	
355 Loan Liability - Non Current	\$0	\$0	\$0	\$0	\$0	
356 FASB 5 Liabilities	\$0	\$0	\$0	\$0	\$0	
357 Accrued Pension and OPEB Liabilities	\$0	\$0	\$0	\$0	\$0	
350 Total Non-Current Liabilities	\$10,682	\$0	\$0	\$7,407,806	\$659,954	\$0
300 Total Liabilities	\$99,291	\$27,898	\$174,717	\$17,725,338	\$719,910	\$1,833
400 Deferred Inflow of Resources	\$0	\$0	\$0	\$0	\$0	
508.4 Net Investment in Capital Assets	\$0	\$0	\$19,619	\$842,875	\$28,163	
511.4 Restricted Net Position	\$0	\$0	\$190,955	\$640,047	\$0	
512.4 Unrestricted Net Position	-\$15,220	-\$439	\$3,267	-\$3,112,534	\$1,320,652	\$520,284
513 Total Equity - Net Assets / Position	-\$15,220	-\$439	\$213,841	-\$3,315,362	\$1,348,815	\$520,284
600 Total Liabilities, Deferred Inflows of Resources and Equity - Net	\$84,071	\$27,459	\$388,558	\$14,409,976	\$2,068,725	\$522,117

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Balance Sheet Summary

Fiscal Year End: 12/31/2023

	14,856 Lower Income Housing Assistance Program, Section 8 Moderate	COCC	ELIM	Total
111 Cash - Unrestricted	\$11,908	\$578,507		\$7,053,061
112 Cash - Restricted - Modernization and Development	\$0	\$0		\$3,598,541
113 Cash - Other Restricted	\$0	\$0		\$1,792,328
114 Cash - Tenant Security Deposits	\$0	\$0		\$656,271
115 Cash - Restricted for Payment of Current Liabilities	\$0	\$0		\$0
100 Total Cash	\$11,908	\$578,507	\$0	\$13,100,201
121 Accounts Receivable - PHA Projects	\$0	\$0		\$0
122 Accounts Receivable - HUD Other Projects	\$0	\$0		\$203,594
124 Accounts Receivable - Other Government	\$0	\$302		\$651,313
125 Accounts Receivable - Miscellaneous	\$60,447	\$0		\$773,871
126 Accounts Receivable - Tenants	\$0	\$0		\$497,935
126.1 Allowance for Doubtful Accounts - Tenants	\$0	\$0		-\$116,368
126.2 Allowance for Doubtful Accounts - Other	\$0	\$0		-\$540,387
127 Notes, Loans, & Mortgages Receivable - Current	\$0	\$0	-\$2,625,492	\$0
128 Fraud Recovery	\$0	\$0		\$112,573
128.1 Allowance for Doubtful Accounts - Fraud	\$0	\$0		-\$6,477
129 Accrued Interest Receivable	\$0	\$0		\$0
120 Total Receivables, Net of Allowances for Doubtful Accounts	\$60,447	\$302	-\$2,625,492	\$1,576,054
131 Investments - Unrestricted	\$0	\$0		\$0
132 Investments - Restricted	\$0	\$0		\$0
135 Investments - Restricted for Payment of Current Liability	\$0	\$0		\$0
142 Prepaid Expenses and Other Assets	\$0	\$53,014		\$314,363
143 Inventories	\$0	\$0		\$0
143.1 Allowance for Obsolete Inventories	\$0	\$0		\$0
144 Inter Program Due From	\$0	\$5,808,972	-\$5,950,492	\$0
145 Assets Held for Sale	\$0	\$10,000		\$20,560
150 Total Current Assets	\$72,355	\$6,450,795	-\$8,575,984	\$15,011,178
161 Land	\$0	\$156		\$8,278,584
162 Buildings	\$0	\$3,030,559		\$201,764,329
163 Furniture, Equipment & Machinery - Dwellings	\$0	\$6,572		\$5,200,983
164 Furniture, Equipment & Machinery - Administration	\$0	\$591,542		\$2,523,506
165 Leasehold Improvements	\$0	\$0		\$4,930,836
166 Accumulated Depreciation	\$0	-\$1,028,775		-\$191,412,446
167 Construction in Progress	\$0	\$57,231		\$1,022,592
168 Infrastructure	\$0	\$0		\$0
160 Total Capital Assets, Net of Accumulated Depreciation	\$0	\$2,657,285	\$0	\$32,308,384
171 Notes, Loans and Mortgages Receivable - Non-Current	\$0	\$0	-\$6,561,593	\$0
172 Notes, Loans, & Mortgages Receivable - Non Current - Past Due	\$0	\$0		\$0
173 Grants Receivable - Non Current	\$0	\$0		\$0
174 Other Assets	\$0	\$0	-\$5,531,699	\$2,901,401
176 Investments in Joint Ventures	\$0	\$0	-\$2,296,065	\$0
180 Total Non-Current Assets	\$0	\$2,657,285	-\$14,389,357	\$35,209,785
200 Deferred Outflow of Resources	\$0	\$0	\$0	\$0
290 Total Assets and Deferred Outflow of Resources	\$72,355	\$9,108,080	-\$22,965,341	\$50,220,963

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Balance Sheet Summary

Fiscal Year End: 12/31/2023

	14,856 Lower Income Housing Assistance Program, Section 8 Moderate	COCC	ELIM	Total
311 Bank Overdraft	\$0	\$0		\$0
312 Accounts Payable <= 90 Days	\$0	\$33,779		\$719,936
313 Accounts Payable >90 Days Past Due	\$0	\$0		\$0
321 Accrued Wage/Payroll Taxes Payable	\$0	\$65,558		\$183,601
322 Accrued Compensated Absences - Current Portion	\$0	\$0		\$0
324 Accrued Contingency Liability	\$0	\$0		\$0
325 Accrued Interest Payable	\$0	\$0	-\$5,531,699	\$0
331 Accounts Payable - HUD PHA Programs	\$0	\$0		\$0
332 Account Payable - PHA Projects	\$0	\$0		\$0
333 Accounts Payable - Other Government	\$0	\$0		\$0
341 Tenant Security Deposits	\$0	\$0		\$656,271
342 Unearned Revenue	\$0	\$10,938		\$619,218
344 Current Portion of Long-term Debt - Operating Borrowings	\$0	\$48,168		\$48,168
344 Current Portion of Long-term Debt - Operating Borrowings	\$0	\$0	-\$2,625,492	\$0
345 Other Current Liabilities	\$0	\$2,253		\$313,282
346 Accrued Liabilities - Other	\$0	\$0		\$3,564
347 Inter Program - Due To	\$44,687	\$0	-\$5,950,492	\$0
348 Loan Liability - Current	\$0	\$0		\$0
310 Total Current Liabilities	\$44,687	\$160,696	-\$14,107,683	\$2,544,040
351 Long-term Debt, Net of Current - Capital Projects/Mortgage Revenue	\$0	\$1,488,896	-\$6,561,593	\$2,290,897
352 Long-term Debt, Net of Current - Operating Borrowings	\$0	\$0		\$0
353 Non-current Liabilities - Other	\$0	\$0		\$902,041
354 Accrued Compensated Absences - Non Current	\$0	\$294,605		\$719,803
355 Loan Liability - Non Current	\$0	\$0		\$0
356 FASB 5 Liabilities	\$0	\$0		\$0
357 Accrued Pension and OPEB Liabilities	\$0	\$0		\$0
350 Total Non-Current Liabilities	\$0	\$1,783,501	-\$6,561,593	\$3,912,741
300 Total Liabilities	\$44,687	\$1,944,197	-\$20,669,276	\$6,456,781
400 Deferred Inflow of Resources	\$0	\$0	\$0	\$2,241,157
508.4 Net Investment in Capital Assets	\$0	\$1,120,221	\$6,561,593	\$29,969,319
511.4 Restricted Net Position	\$0	\$0		\$4,429,543
512.4 Unrestricted Net Position	\$27,668	\$6,043,662	-\$8,857,658	\$7,124,163
513 Total Equity - Net Assets / Position	\$27,668	\$7,163,883	-\$2,296,065	\$41,523,025
600 Total Liabilities, Deferred Inflows of Resources and Equity - Net	\$72,355	\$9,108,080	-\$22,965,341	\$50,220,963

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	Project Total	14.879 Mainstream Vouchers	14.889 Choice Neighborhoods Implementation Grants	14.239 HOME Investment Partnerships Program	14.238 Shelter Plus Care	14.896 PIH Family Self-Sufficiency Program
70300 Net Tenant Rental Revenue	\$6,858,759	\$0	\$0	\$0	\$0	\$0
70400 Tenant Revenue - Other	\$498,229	\$0	\$0	\$0	\$0	\$0
70500 Total Tenant Revenue	\$7,356,988	\$0	\$0	\$0	\$0	\$0
70600 HUD PHA Operating Grants	\$14,760,538	\$791,148	\$0	\$0	\$0	\$426,972
70610 Capital Grants	\$1,941,351					
70710 Management Fee						
70720 Asset Management Fee						
70730 Book Keeping Fee						
70740 Front Line Service Fee						
70750 Other Fees						
70700 Total Fee Revenue						
70800 Other Government Grants	\$0	\$0	\$869,875	\$175,836	\$0	\$0
71100 Investment Income - Unrestricted	\$248,570	\$0	\$0	\$0	\$0	\$0
71200 Mortgage Interest Income	\$55,475	\$0	\$0	\$0	\$0	\$0
71300 Proceeds from Disposition of Assets Held for Sale	\$0	\$0	\$0	\$0	\$0	\$0
71310 Cost of Sale of Assets	\$0	\$0	\$0	\$0	\$0	\$0
71400 Fraud Recovery	\$16,651	\$0	\$0	\$0	\$0	\$0
71500 Other Revenue	\$698,883	\$0	\$0	\$17,584	\$0	\$0
71600 Gain or Loss on Sale of Capital Assets	\$0	\$0	\$0	\$0	\$0	\$0
72000 Investment Income - Restricted	\$0	\$0	\$0	\$0	\$0	\$0
70000 Total Revenue	\$25,078,456	\$791,148	\$869,875	\$193,420	\$0	\$426,972
91100 Administrative Salaries	\$988,306	\$52,013	\$349,637	\$0	\$0	\$284,714
91200 Auditing Fees	\$65,454	\$1,224	\$106	\$0	\$0	\$41
91300 Management Fee	\$1,205,722	\$0	\$0	\$0	\$0	\$0
91310 Book-keeping Fee	\$159,665	\$0	\$0	\$0	\$0	\$0
91400 Advertising and Marketing	\$0	\$0	\$0	\$0	\$0	\$0
91500 Employee Benefit contributions - Administrative	\$300,422	\$17,384	\$79,008	\$0	\$0	\$77,041
91600 Office Expenses	\$472,235	\$17,559	\$5,356	\$2,262	\$0	\$55,731
91700 Legal Expense	\$144,846	\$0	\$17,718	\$0	\$0	\$0
91800 Travel	\$30	\$0	\$51	\$0	\$0	\$0
91810 Allocated Overhead	\$0	\$0	\$0	\$0	\$0	\$0
91900 Other	\$595,365	\$11	\$0	\$0	\$0	\$0
91000 Total Operating - Administrative	\$3,932,045	\$88,191	\$451,876	\$2,262	\$0	\$417,527
92000 Asset Management Fee	\$0	\$0	\$0	\$0	\$0	\$0
92100 Tenant Services - Salaries	\$120,478	\$0	\$0	\$0	\$0	\$0
92200 Relocation Costs	\$18,149	\$0	\$136,934	\$0	\$0	\$0
92300 Employee Benefit Contributions - Tenant Services	\$5,679	\$0	\$0	\$0	\$0	\$0
92400 Tenant Services - Other	\$2,038,377	\$120	\$91,485	\$0	\$0	\$346
92500 Total Tenant Services	\$2,182,683	\$120	\$228,419	\$0	\$0	\$346
93100 Water	\$430,173	\$0	\$0	\$0	\$0	\$0
93200 Electricity	\$1,638,507	\$0	\$0	\$0	\$0	\$0
93300 Gas	\$572,431	\$0	\$0	\$0	\$0	\$0
93400 Fuel	\$0	\$0	\$0	\$0	\$0	\$0
93500 Labor	\$0	\$0	\$0	\$0	\$0	\$0
93600 Sewer	\$2,359	\$0	\$0	\$0	\$0	\$0
93700 Employee Benefit Contributions - Utilities	\$0	\$0	\$0	\$0	\$0	\$0
93800 Other Utilities Expense	\$567,182	\$0	\$0	\$0	\$0	\$0
93000 Total Utilities	\$3,210,652	\$0	\$0	\$0	\$0	\$0

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	Project Total	14.879 Mainstream Vouchers	14.889 Choice Neighborhoods Implementation Grants	14.239 HOME Investment Partnerships Program	14.238 Shelter Plus Care	14.896 PIH Family Self-Sufficiency Program
94100 Ordinary Maintenance and Operations - Labor	\$2,784,197	\$5,935	\$0	\$0	\$0	\$0
94200 Ordinary Maintenance and Operations - Materials and Other	\$749,678	\$94	\$0	\$0	\$0	\$0
94300 Ordinary Maintenance and Operations Contracts	\$6,414,489	\$808	\$3,150	\$0	\$0	\$0
94500 Employee Benefit Contributions - Ordinary Maintenance	\$891,387	\$2,262	\$0	\$0	\$0	\$0
94000 Total Maintenance	\$10,839,751	\$9,099	\$3,150	\$0	\$0	\$0
95100 Protective Services - Labor	\$0	\$0	\$0	\$0	\$0	\$0
95200 Protective Services - Other Contract Costs	\$413,407	\$0	\$0	\$0	\$0	\$0
95300 Protective Services - Other	\$147,105	\$0	\$0	\$0	\$0	\$0
95500 Employee Benefit Contributions - Protective Services	\$0	\$0	\$0	\$0	\$0	\$0
95000 Total Protective Services	\$560,512	\$0	\$0	\$0	\$0	\$0
96110 Property Insurance	\$643,026	\$0	\$5,040	\$0	\$0	\$0
96120 Liability Insurance	\$185,986	\$112	\$687	\$0	\$0	\$1,638
96130 Workmen's Compensation	\$104,924	\$369	\$4,735	\$0	\$0	\$7,461
96140 All Other Insurance	\$2,040	\$0	\$0	\$0	\$0	\$0
96100 Total Insurance Premiums	\$935,976	\$481	\$10,462	\$0	\$0	\$9,099
96200 Other General Expenses	\$740,797	\$0	\$0	\$0	\$0	\$0
96210 Compensated Absences	\$0	\$0	\$0	\$0	\$0	\$0
96300 Payments in Lieu of Taxes	\$0	\$0	\$0	\$0	\$0	\$0
96400 Bad debt - Tenant Rents	\$472,667	\$0	\$0	\$0	\$0	\$0
96500 Bad debt - Mortgages	\$0	\$0	\$0	\$0	\$0	\$0
96600 Bad debt - Other	\$0	\$0	\$0	\$0	\$0	\$0
96800 Severance Expense	\$0	\$0	\$0	\$0	\$0	\$0
96000 Total Other General Expenses	\$1,213,464	\$0	\$0	\$0	\$0	\$0
96710 Interest of Mortgage (or Bonds) Payable	\$0	\$0	\$0	\$0	\$0	\$0
96720 Interest on Notes Payable (Short and Long Term)	\$0	\$0	\$0	\$0	\$0	\$0
96730 Amortization of Bond Issue Costs	\$0	\$0	\$0	\$0	\$0	\$0
96700 Total Interest Expense and Amortization Cost	\$0	\$0	\$0	\$0	\$0	\$0
96900 Total Operating Expenses	\$22,875,083	\$97,891	\$693,907	\$2,262	\$0	\$426,972
97000 Excess of Operating Revenue over Operating Expenses	\$2,203,373	\$693,257	\$175,968	\$191,158	\$0	\$0
97100 Extraordinary Maintenance	\$0	\$0	\$0	\$0	\$0	\$0
97200 Casualty Losses - Non-capitalized	\$0	\$0	\$0	\$0	\$0	\$0
97300 Housing Assistance Payments	\$0	\$729,104	\$0	\$174,076	\$0	\$0
97350 HAP Portability-In	\$941	\$0	\$0	\$0	\$0	\$0
97400 Depreciation Expense	\$2,182,956	\$0	\$0	\$0	\$0	\$0
97500 Fraud Losses	\$0	\$0	\$0	\$0	\$0	\$0
97600 Capital Outlays - Governmental Funds						
97700 Debt Principal Payment - Governmental Funds						
97800 Dwelling Units Rent Expense	\$0	\$0	\$0	\$0	\$0	\$0
90000 Total Expenses	\$25,058,980	\$826,995	\$693,907	\$176,338	\$0	\$426,972

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	Project Total	14.879 Mainstream Vouchers	14.889 Choice Neighborhoods Implementation Grants	14.239 HOME Investment Partnerships Program	14.238 Shelter Plus Care	14.896 PIH Family Self-Sufficiency Program
10010 Operating Transfer In	\$1,793,301	\$0	\$0	\$0	\$0	\$0
10020 Operating transfer Out	-\$1,793,301	\$0	\$0	\$0	\$0	\$0
10030 Operating Transfers from/to Primary Government	\$0	\$0	\$0	\$0	\$0	\$0
10040 Operating Transfers from/to Component Unit	\$0	\$0	\$0	\$0	\$0	\$0
10050 Proceeds from Notes, Loans and Bonds						
10060 Proceeds from Property Sales						
10070 Extraordinary Items, Net Gain/Loss	\$0	\$0	\$0	\$0	\$0	\$0
10080 Special Items (Net Gain/Loss)	\$0	\$0	\$0	\$0	\$0	\$0
10091 Inter Project Excess Cash Transfer In	\$0					
10092 Inter Project Excess Cash Transfer Out	\$0					
10093 Transfers between Program and Project - In	\$0	\$0	\$0	\$0	\$0	\$0
10094 Transfers between Project and Program - Out	\$0	\$0	\$0	\$0	\$0	\$0
10100 Total Other financing Sources (Uses)	\$0	\$0	\$0	\$0	\$0	\$0
10000 Excess (Deficiency) of Total Revenue Over (Under) Total Expenses	\$19,476	-\$35,847	\$175,968	\$17,082	\$0	\$0
11020 Required Annual Debt Principal Payments	\$0	\$0	\$0	\$0	\$0	\$0
11030 Beginning Equity	\$37,237,231	\$164,672	-\$237,686	\$55,300	\$34,846	-\$52,688
11040 Prior Period Adjustments, Equity Transfers and Correction of Errors	\$501,624	\$0	\$416	\$0	\$0	-\$4,774
11050 Changes in Compensated Absence Balance						
11060 Changes in Contingent Liability Balance						
11070 Changes in Unrecognized Pension Transition Liability						
11080 Changes in Special Term/Severance Benefits Liability						
11090 Changes in Allowance for Doubtful Accounts - Dwelling Rents						
11100 Changes in Allowance for Doubtful Accounts - Other						
11170 Administrative Fee Equity						
11180 Housing Assistance Payments Equity						
11190 Unit Months Available	32493	1184	0	440	0	0
11210 Number of Unit Months Leased	29266	1184	0	440	0	0

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	14.870 Resident Opportunity and Supportive Services	14.892 Choice Neighborhoods Planning Grants	1 Business Activities	6.2 Component Unit Blended	14.871 Housing Choice Vouchers	14.EHV Emergency Housing Voucher
70300 Net Tenant Rental Revenue	\$0	\$0	\$283,645	\$1,595,425	\$0	
70400 Tenant Revenue - Other	\$0	\$0	\$13,985	\$112,948	\$0	
70500 Total Tenant Revenue	\$0	\$0	\$297,630	\$1,708,373	\$0	\$0
70600 HUD PHA Operating Grants	\$272,106	\$0	\$0	\$0	\$41,314,328	\$1,221,227
70610 Capital Grants					\$0	
70710 Management Fee						
70720 Asset Management Fee						
70730 Book Keeping Fee						
70740 Front Line Service Fee						
70750 Other Fees			\$0			
70700 Total Fee Revenue						
70800 Other Government Grants	\$0	\$0	\$0	\$3,500	\$0	
71100 Investment Income - Unrestricted	\$0	\$0	\$1,693	\$8,475	\$304	
71200 Mortgage Interest Income	\$0	\$0	\$0	\$0	\$0	
71300 Proceeds from Disposition of Assets Held for Sale	\$0	\$0	\$0	\$0	\$0	
71310 Cost of Sale of Assets	\$0	\$0	\$0	\$0	\$0	
71400 Fraud Recovery	\$0	\$0	\$0	\$5,364	\$3,826	
71500 Other Revenue	\$0	\$0	\$132,422	\$348,212	\$72,427	
71600 Gain or Loss on Sale of Capital Assets	\$0	\$0	\$0	\$0	\$0	
72000 Investment Income - Restricted	\$0	\$0	\$0	\$0	\$0	
70000 Total Revenue	\$272,106	\$0	\$431,745	\$2,073,924	\$41,390,885	\$1,221,227
91100 Administrative Salaries	\$188,810	\$0	\$10,293	\$76,683	\$1,254,604	
91200 Auditing Fees	\$41	\$0	\$5,200	\$4,519	\$43,362	
91300 Management Fee	\$0	\$0	\$0	\$128,817	\$608,339	\$16,364
91310 Book-keeping Fee	\$0	\$0	\$0	\$17,116	\$379,950	\$8,100
91400 Advertising and Marketing	\$0	\$0	\$0	\$0	\$0	
91500 Employee Benefit contributions - Administrative	\$79,364	\$0	\$3,975	\$26,873	\$412,336	
91600 Office Expenses	\$16,858	\$0	\$19,103	\$98,261	\$494,962	\$337
91700 Legal Expense	\$0	\$0	\$1,076	\$15,305	\$0	
91800 Travel	\$0	\$0	\$0	\$0	\$0	
91810 Allocated Overhead	\$0	\$0	\$0	\$0	\$0	
91900 Other	\$0	\$0	\$47,743	\$7,222	\$258	
91000 Total Operating - Administrative	\$285,073	\$0	\$87,390	\$374,796	\$3,193,811	\$24,801
92000 Asset Management Fee	\$0	\$0	\$0	\$0	\$0	
92100 Tenant Services - Salaries	\$0	\$0	\$0	\$0	\$0	
92200 Relocation Costs	\$0	\$0	\$7,856	\$395	\$7,371	\$11,326
92300 Employee Benefit Contributions - Tenant Services	\$0	\$0	\$0	\$0	\$0	
92400 Tenant Services - Other	\$0	\$0	\$91,454	\$146,486	\$2,846	
92500 Total Tenant Services	\$0	\$0	\$99,310	\$146,881	\$10,217	\$11,326
93100 Water	\$0	\$0	\$10,855	\$29,007	\$0	
93200 Electricity	\$0	\$0	\$3,152	\$26,536	\$0	
93300 Gas	\$0	\$0	\$6,804	\$4,237	\$0	
93400 Fuel	\$0	\$0	\$0	\$0	\$0	
93500 Labor	\$0	\$0	\$0	\$0	\$0	
93600 Sewer	\$0	\$0	\$0	\$0	\$0	
93700 Employee Benefit Contributions - Utilities	\$0	\$0	\$0	\$0	\$0	
93800 Other Utilities Expense	\$0	\$0	\$14,946	\$44,546	\$0	
93000 Total Utilities	\$0	\$0	\$35,757	\$104,326	\$0	\$0

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	14.870 Resident Opportunity and Supportive Services	14.892 Choice Neighborhoods Planning Grants	1 Business Activities	6.2 Component Unit Blended	14.871 Housing Choice Vouchers	14.EHV Emergency Housing Voucher
94100 Ordinary Maintenance and Operations - Labor	\$0	\$0	\$32,303	\$349,705	\$224,221	
94200 Ordinary Maintenance and Operations - Materials and Other	\$0	\$0	\$6,569	\$85,709	\$8,276	
94300 Ordinary Maintenance and Operations Contracts	\$0	\$0	\$81,235	\$382,065	\$16,473	
94500 Employee Benefit Contributions - Ordinary Maintenance	\$0	\$0	\$23,177	\$85,692	\$64,856	
94000 Total Maintenance	\$0	\$0	\$143,284	\$903,171	\$313,826	\$0
95100 Protective Services - Labor	\$0	\$0	\$297	\$0	\$0	
95200 Protective Services - Other Contract Costs	\$188	\$0	\$0	\$10,936	\$0	
95300 Protective Services - Other	\$0	\$0	\$192	\$51,441	\$0	
95500 Employee Benefit Contributions - Protective Services	\$0	\$0	\$0	\$0	\$0	
95000 Total Protective Services	\$188	\$0	\$489	\$62,377	\$0	\$0
96110 Property Insurance	\$0	\$0	\$14,425	\$122,346	\$2,962	
96120 Liability Insurance	\$0	\$0	\$8,176	\$70,769	\$17,839	
96130 Workmen's Compensation	\$5,321	\$0	\$1,280	\$9,278	\$44,333	
96140 All Other Insurance	\$0	\$0	\$0	\$0	\$0	
96100 Total Insurance Premiums	\$5,321	\$0	\$23,881	\$202,393	\$65,134	\$0
96200 Other General Expenses	\$0	\$0	\$0	\$12,344	\$0	
96210 Compensated Absences	\$0	\$0	\$0	\$0	\$0	
96300 Payments in Lieu of Taxes	\$0	\$0	\$0	\$0	\$0	
96400 Bad debt - Tenant Rents	\$0	\$0	\$13,849	\$71,759	\$0	
96500 Bad debt - Mortgages	\$0	\$0	\$0	\$0	\$0	
96600 Bad debt - Other	\$0	\$0	\$0	\$0	\$0	
96800 Severance Expense	\$0	\$0	\$0	\$0	\$0	
96000 Total Other General Expenses	\$0	\$0	\$13,849	\$84,103	\$0	\$0
96710 Interest of Mortgage (or Bonds) Payable	\$0	\$0	\$0	\$50,497	\$0	
96720 Interest on Notes Payable (Short and Long Term)	\$0	\$0	\$0	\$0	\$0	
96730 Amortization of Bond Issue Costs	\$0	\$0	\$0	\$0	\$0	
96700 Total Interest Expense and Amortization Cost	\$0	\$0	\$0	\$50,497	\$0	\$0
96900 Total Operating Expenses	\$290,582	\$0	\$403,960	\$1,928,544	\$3,582,988	\$36,127
97000 Excess of Operating Revenue over Operating Expenses	\$18,476	\$0	\$27,785	\$145,380	\$37,807,897	\$1,185,100
97100 Extraordinary Maintenance	\$0	\$0	\$0	\$0	\$0	
97200 Casualty Losses - Non-capitalized	\$0	\$0	\$0	\$0	\$0	
97300 Housing Assistance Payments	\$0	\$0	\$0	\$0	\$37,336,443	\$971,441
97350 HAP Portability-In	\$0	\$0	\$0	\$0	\$0	
97400 Depreciation Expense	\$0	\$0	\$734	\$734,004	\$15,510	
97500 Fraud Losses	\$0	\$0	\$0	\$0	\$0	
97600 Capital Outlays - Governmental Funds						
97700 Debt Principal Payment - Governmental Funds						
97800 Dwelling Units Rent Expense	\$0	\$0	\$0	\$0	\$0	
90000 Total Expenses	\$290,582	\$0	\$404,694	\$2,662,548	\$40,934,941	\$1,007,568

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	14.870 Resident Opportunity and Supportive Services	14.892 Choice Neighborhoods Planning Grants	1 Business Activities	6.2 Component Unit Blended	14.871 Housing Choice Vouchers	14.EHV Emergency Housing Voucher
10010 Operating Transfer In	\$0	\$0	\$0	\$0	\$0	
10020 Operating transfer Out	\$0	\$0	\$0	\$0	\$0	
10030 Operating Transfers from/to Primary Government	\$0	\$0	\$0	\$0	\$0	
10040 Operating Transfers from/to Component Unit	\$0	\$0	\$0	\$0	\$0	
10050 Proceeds from Notes, Loans and Bonds						
10060 Proceeds from Property Sales						
10070 Extraordinary Items, Net Gain/Loss	\$0	\$0	\$0	\$0	\$0	
10080 Special Items (Net Gain/Loss)	\$0	\$0	\$0	\$0	\$0	
10091 Inter Project Excess Cash Transfer In						
10092 Inter Project Excess Cash Transfer Out						
10093 Transfers between Program and Project - In	\$0	\$0	\$0	\$0	\$0	
10094 Transfers between Project and Program - Out	\$0	\$0	\$0	\$0	\$0	
10100 Total Other financing Sources (Uses)	\$0	\$0	\$0	\$0	\$0	\$0
10000 Excess (Deficiency) of Total Revenue Over (Under) Total Expenses	-\$18,476	\$0	\$27,051	-\$588,624	\$455,944	\$213,659
11020 Required Annual Debt Principal Payments	\$0	\$0	\$0	\$20,250	\$0	\$0
11030 Beginning Equity	-\$33	-\$439	\$188,098	-\$2,400,380	\$892,871	\$306,625
11040 Prior Period Adjustments, Equity Transfers and Correction of Errors	\$3,289	\$0	-\$1,308	-\$326,358	\$0	\$0
11050 Changes in Compensated Absence Balance						
11060 Changes in Contingent Liability Balance						
11070 Changes in Unrecognized Pension Transition Liability						
11080 Changes in Special Term/Severance Benefits Liability						
11090 Changes in Allowance for Doubtful Accounts - Dwelling Rents						
11100 Changes in Allowance for Doubtful Accounts - Other						
11170 Administrative Fee Equity					\$1,348,815	
11180 Housing Assistance Payments Equity					\$0	
11190 Unit Months Available	0	0	0	836	56396	1391
11210 Number of Unit Months Leased	0	0	0	836	48738	1287

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	14,856 Lower Income Housing Assistance Program_Section 8 Moderate	COCC	ELIM	Total
70300 Net Tenant Rental Revenue	\$0	\$23,502	-\$487,531	\$8,273,800
70400 Tenant Revenue - Other	\$0	\$129,572		\$754,734
70500 Total Tenant Revenue	\$0	\$153,074	-\$487,531	\$9,028,534
70600 HUD PHA Operating Grants	\$546,513	\$0		\$59,332,832
70610 Capital Grants	\$0	\$0		\$1,941,351
70710 Management Fee	\$0	\$1,961,745	-\$1,961,745	\$0
70720 Asset Management Fee	\$0	\$0	\$0	\$0
70730 Book Keeping Fee	\$0	\$569,580	-\$569,580	\$0
70740 Front Line Service Fee	\$0	\$0		\$0
70750 Other Fees	\$0	\$2,896,739	-\$2,896,739	\$0
70700 Total Fee Revenue	\$0	\$5,428,064	-\$5,428,064	\$0
70800 Other Government Grants	\$0	\$0		\$1,049,211
71100 Investment Income - Unrestricted	\$0	\$4,132		\$263,174
71200 Mortgage Interest Income	\$0	\$0	-\$55,475	\$0
71300 Proceeds from Disposition of Assets Held for Sale	\$0	\$0		\$0
71310 Cost of Sale of Assets	\$0	\$0		\$0
71400 Fraud Recovery	\$0	\$0		\$25,841
71500 Other Revenue	\$0	\$67,218		\$1,336,746
71600 Gain or Loss on Sale of Capital Assets	\$0	\$488,881		\$488,881
72000 Investment Income - Restricted	\$0	\$0		\$0
70000 Total Revenue	\$546,513	\$6,141,369	-\$5,971,070	\$73,466,570
91100 Administrative Salaries	\$33,511	\$3,849,293		\$7,087,864
91200 Auditing Fees	\$976	\$10,625		\$131,548
91300 Management Fee	\$8,940		-\$1,961,745	\$6,437
91310 Book-keeping Fee	\$5,588		-\$569,580	\$839
91400 Advertising and Marketing	\$0	\$3,682		\$3,682
91500 Employee Benefit contributions - Administrative	\$10,706	\$1,189,140		\$2,196,249
91600 Office Expenses	\$15,880	\$630,821		\$1,829,365
91700 Legal Expense	\$0	\$83,413		\$262,358
91800 Travel	\$0	\$6,115		\$6,196
91810 Allocated Overhead	\$0			\$0
91900 Other	\$7	\$2,249	-\$567,424	\$85,431
91000 Total Operating - Administrative	\$75,608	\$5,775,338	-\$3,098,749	\$11,609,969
92000 Asset Management Fee	\$0		\$0	\$0
92100 Tenant Services - Salaries	\$0	\$8,709		\$129,187
92200 Relocation Costs	\$0	\$10,289		\$192,320
92300 Employee Benefit Contributions - Tenant Services	\$0	\$20,181		\$25,860
92400 Tenant Services - Other	\$34	\$36,999	-\$2,045,119	\$363,028
92500 Total Tenant Services	\$34	\$76,178	-\$2,045,119	\$710,395
93100 Water	\$0	\$1,353		\$471,388
93200 Electricity	\$0	\$40,699		\$1,708,894
93300 Gas	\$0	\$5,777		\$589,249
93400 Fuel	\$0	\$0		\$0
93500 Labor	\$0	\$0		\$0
93600 Sewer	\$0	\$0		\$2,359
93700 Employee Benefit Contributions - Utilities	\$0	\$0		\$0
93800 Other Utilities Expense	\$0	\$1,928		\$628,602
93000 Total Utilities	\$0	\$49,757	\$0	\$3,400,492

See report of independent auditors.

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	14.856 Lower Income Housing Assistance Program_Section 8 Moderate	COCC	ELIM	Total
94100 Ordinary Maintenance and Operations - Labor	\$3,769	\$110,991		\$3,511,121
94200 Ordinary Maintenance and Operations - Materials and Other	\$74	-\$20,591		\$829,809
94300 Ordinary Maintenance and Operations Contracts	\$521	\$32,211		\$6,930,952
94500 Employee Benefit Contributions - Ordinary Maintenance	\$1,346	\$128,602		\$1,197,322
94000 Total Maintenance	\$5,710	\$251,213	\$0	\$12,469,204
95100 Protective Services - Labor	\$0	\$283,899	-\$284,196	\$0
95200 Protective Services - Other Contract Costs	\$40	\$18,014		\$442,585
95300 Protective Services - Other	\$184	\$4,929		\$203,851
95500 Employee Benefit Contributions - Protective Services	\$0	\$71,294		\$71,294
95000 Total Protective Services	\$224	\$378,136	-\$284,196	\$717,730
96110 Property Insurance	\$0	\$18,505		\$806,304
96120 Liability Insurance	\$0	\$60,855		\$346,062
96130 Workmen's Compensation	\$0	\$127,136		\$304,837
96140 All Other Insurance	\$0	\$0		\$2,040
96100 Total Insurance Premiums	\$0	\$206,496	\$0	\$1,459,243
96200 Other General Expenses	\$42,680	\$38,285	-\$487,531	\$346,575
96210 Compensated Absences	\$0	\$0		\$0
96300 Payments in Lieu of Taxes	\$0	\$0		\$0
96400 Bad debt - Tenant Rents	\$0	\$10,251		\$568,526
96500 Bad debt - Mortgages	\$0	\$0		\$0
96600 Bad debt - Other	\$0	\$0		\$0
96800 Severance Expense	\$0	\$0		\$0
96000 Total Other General Expenses	\$42,680	\$48,536	-\$487,531	\$915,101
96710 Interest of Mortgage (or Bonds) Payable	\$0	\$76,648	-\$55,475	\$71,670
96720 Interest on Notes Payable (Short and Long Term)	\$0	\$0		\$0
96730 Amortization of Bond Issue Costs	\$0	\$0		\$0
96700 Total Interest Expense and Amortization Cost	\$0	\$76,648	-\$55,475	\$71,670
96900 Total Operating Expenses	\$124,256	\$6,862,302	-\$5,971,070	\$31,353,804
97000 Excess of Operating Revenue over Operating Expenses	\$422,257	-\$720,933	\$0	\$42,112,766
97100 Extraordinary Maintenance	\$0	\$0		\$0
97200 Casualty Losses - Non-capitalized	\$0	\$0		\$0
97300 Housing Assistance Payments	\$512,610	\$0		\$39,723,674
97350 HAP Portability-In	\$0	\$0		\$941
97400 Depreciation Expense	\$0	\$215,796		\$3,149,000
97500 Fraud Losses	\$0	\$0		\$0
97600 Capital Outlays - Governmental Funds	\$0			
97700 Debt Principal Payment - Governmental Funds	\$0			
97800 Dwelling Units Rent Expense	\$0	\$0		\$0
90000 Total Expenses	\$636,866	\$7,078,098	-\$5,971,070	\$74,227,419

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	14.856 Lower Income Housing Assistance Program_Section 8 Moderate	COCC	ELIM	Total
10010 Operating Transfer In	\$0	\$0	-\$1,793,301	\$0
10020 Operating transfer Out	\$0	\$0	\$1,793,301	\$0
10030 Operating Transfers from/to Primary Government	\$0	\$0		\$0
10040 Operating Transfers from/to Component Unit	\$0	\$0		\$0
10050 Proceeds from Notes, Loans and Bonds	\$0			
10060 Proceeds from Property Sales	\$0			
10070 Extraordinary Items, Net Gain/Loss	\$0	\$0		\$0
10080 Special Items (Net Gain/Loss)	\$0	\$0		\$0
10091 Inter Project Excess Cash Transfer In	\$0			\$0
10092 Inter Project Excess Cash Transfer Out	\$0			\$0
10093 Transfers between Program and Project - In	\$0	\$0		\$0
10094 Transfers between Project and Program - Out	\$0	\$0		\$0
10100 Total Other financing Sources (Uses)	\$0	\$0	\$0	\$0
10000 Excess (Deficiency) of Total Revenue Over (Under) Total Expenses	-\$90,353	-\$936,729	\$0	-\$760,849
11020 Required Annual Debt Principal Payments	\$0	\$9,593		\$29,843
11030 Beginning Equity	\$118,021	\$8,273,501		\$44,579,939
11040 Prior Period Adjustments, Equity Transfers and Correction of Errors	\$0	-\$172,889	\$0	\$0
11050 Changes in Compensated Absence Balance	\$0			
11060 Changes in Contingent Liability Balance	\$0			
11070 Changes in Unrecognized Pension Transition Liability	\$0			
11080 Changes in Special Term/Severance Benefits Liability	\$0			
11090 Changes in Allowance for Doubtful Accounts - Dwelling Rents	\$0			
11100 Changes in Allowance for Doubtful Accounts - Other	\$0			
11170 Administrative Fee Equity	\$0			\$1,348,815
11180 Housing Assistance Payments Equity	\$0			\$0
11190 Unit Months Available	1365	0		94105
11210 Number of Unit Months Leased	1365	0		83116



September 19, 2024

To the Board of Commissioners of the
Housing Authority of the City of Omaha:

We have audited the financial statements of the Housing Authority of the City of Omaha (the "Authority") as of and for the year ended December 31, 2023, and have issued our report thereon dated September 19, 2024. Professional standards require that we provide you with information about our responsibilities under generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance, as well as certain information related to the planned scope and timing of our audit. We have communicated such information in our engagement letter dated November 2, 2023. Professional standards also require that we communicate to you the following information related to our audit.

Significant Audit Matters

Qualitative Aspects of Accounting Practices

Management is responsible for the selection and use of appropriate accounting policies. The significant accounting policies used by the Authority are described in Note 1 to the financial statements. As described in Note 1, the Authority changed accounting policies by adopting GASB 96, Subscription-Based Information Technology Arrangements in 2023. We noted no transactions entered into by the Authority during the year for which there is a lack of authoritative guidance or consensus. All significant transactions have been recognized in the financial statements in the proper period.

Accounting estimates are an integral part of the financial statements and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ significantly from those expected. The most sensitive estimates affecting the financial statements were:

Management's estimate of depreciation of fixed assets, allowance for uncollectable accounts, and accrued compensation, which is based on the life expectancies of the assets, the likelihood of collection of accounts receivable, and the compensated absences for which employees expect to be paid, respectively. We evaluated the key factors and assumptions used to develop the depreciation of fixed assets, allowance for doubtful accounts, and current and non-current portions of accrued compensated absences in determining that they are consistent with industry practices and, therefore, reasonable in relation to the financial statements taken as a whole.

Certain financial statement disclosures are particularly sensitive because of their significance to financial statement users. In this instance, there were no particularly sensitive financial statement disclosures.

The financial statement disclosures are neutral, consistent, and clear.

Difficulties Encountered in Performing the Audit

Other than as disclosed below in the internal control section of this letter, we encountered no significant difficulties in performing and completing our audit.

Corrected and Uncorrected Misstatements

Professional standards require us to accumulate all misstatements identified during the audit, other than those that are clearly trivial, and communicate them to the appropriate level of management. The following material misstatements detected as a result of audit procedures were corrected by management:

- Proper recording of cash
- Proper recording of accounts receivable
- Proper recording of construction in progress
- Proper recording of interprograms
- Proper recording of accrued interest payable
- Proper recording of other liabilities

Disagreements with Management

For purposes of this letter, a disagreement with management is a disagreement on a financial accounting, reporting, or auditing matter, whether or not resolved to our satisfaction, that could be significant to the financial statements or the auditors' report. We are pleased to report that no such disagreements arose during the course of our audit.

Management Representations

We have requested certain representations from management that are included in the management representation letter dated September 19, 2024.

Management Consultations with Other Independent Accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on certain situations. If a consultation involves application of an accounting principle to the Authority's financial statements or a determination of the type of auditors' opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all the relevant facts. To our knowledge, there were no such consultations with other accountants.

Other Audit Findings or Issues

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as the Authority's auditors. However, these discussions occurred in the normal course of our professional relationship and our responses were not a condition to our retention.

Other Matters

With respect to the supplementary information accompanying the financial statements, we made certain inquiries of management and evaluated the form, content, and methods of preparing the information to determine that the information complies with U.S. generally accepted accounting principles, the method of preparing it has not changed from the prior period, and the information is appropriate and complete in relation to our audit of the financial statements. We compared and reconciled the supplementary information to the underlying accounting records used to prepare the financial statements or to the financial statements themselves.

We were engaged to report on the schedule of expenditures of federal awards and the financial data schedule which accompany the financial statements. With respect to the supplementary information accompanying the financial statements, we made certain inquiries of management and evaluated the form, content, and methods of preparing the information to determine that the information complies with U.S. generally accepted accounting principles, the method of preparing it has not changed from the prior period, and the information is appropriate and complete in relation to our audit of the financial statements. We compared and reconciled the supplementary information to the underlying accounting records used to prepare the financial statements or to the financial statements themselves.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements of the Authority as of and for the year ended December 31, 2023, in accordance with auditing standards generally accepted in the United States of America, we considered the Authority's internal control over financial reporting ("internal control") as a basis for designing audit

procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as discussed below, we identified certain deficiencies in internal control that we consider to be material weaknesses.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies in internal control, such that there is a reasonable possibility that a material misstatement of the Authority's financial statements will not be prevented, or detected and corrected, on a timely basis. We consider the following deficiencies in the Authority's internal control to be material weaknesses:

- The Authority did not maintain adequate internal controls over financial reporting. Controls are not in place to ensure the Authority records and reports financial data reliably in accordance with generally accepted accounting principles.
- The Authority has not properly considered, designed, implemented, maintained and monitored a system of internal controls that reasonably assures the program is in compliance with eligibility. As a result, the Section 8 Housing Voucher Cluster is in material non-compliance with the compliance requirements of the program.

This information is intended solely for the use of the Board and management of the Authority and is not intended to be, and should not be, used by anyone other than these specified parties.

Very truly yours,

A handwritten signature in blue ink that reads "Novogradac & Company LLP". The signature is written in a cursive, flowing style.

NOVOGRADAC & COMPANY LLP

5. REPORT OF CHIEF EXECUTIVE OFFICER

6. ACTION ITEMS

6.1. CONSENT AGENDA ITEMS FOR CONSIDERATION

6.1.1. Minutes of Previous Regular Board Meeting (11/07/2024)

OMAHA HOUSING AUTHORITY
BOARD OF COMMISSIONERS MEETING MINUTES
1823 Harney St, Omaha, Nebraska 68102
8:30 a.m. November 7, 2024

STAFF PRESENT: Joanie Poore, Brian Hansen, Michelle Therkildsen, Latina Jackson, Sal Issaka, Philisa Smith, Susan Gilroy, Ashley Hatheway, Lindsey Anderson, Charles Karl, Sarah Nothhorn, Kristin Broyhill

The meeting was called to order at 8:32 a.m.

1. ANNOUNCEMENT OF OPEN MEETINGS ACT:

The meeting falls under the Open Meetings Act and copies of the law are available.

2. ROLL CALL: Commissioners Present:

David Levy, Chair
Joel Dougherty, Vice Chair
Cammy Watkins
Jennifer Taylor
Christine Johnson

Commissioners Absent:

Tony Veland
Danielle Goodwin

3. PUBLIC COMMENTS:

Chair Levy stated that Public Comment will be moved to the end of the meeting.

4. AUDIT PRESENTATION:

Ms. Poore stated that the Audit Presentation will be next month.

5. REPORT OF THE CHIEF EXECUTIVE OFFICER:

Ms. Poore stated she will forgo her report until the end of the meeting to allow more time for Action Items and Public Comment.

6. ACTION ITEMS

6.1. CONSENT AGENDA ITEMS FOR CONSIDERATION

(All items listed under the Consent Agenda will be enacted by one motion unless a commissioner requires otherwise, in which event the item may be removed from the Consent Agenda and considered separately.)

6.1.1. Minutes of Previous Special Board Meeting (10/09/2024)

6.1.2. Minutes of Previous Regular Board Meeting (09/05/2024)

6.1.3. Finance/Procurement/Operations Committee Resolutions

- 6.1.3.1. Resolution 2024-95 OHA Past Due Write Offs
- 6.1.3.2. Resolution 2024-96 Tower Plumbing Stack Replacement Contract
- 6.1.3.3. Resolution 2024-97 Tower Windows Replacement Contract
- 6.1.3.4. Resolution 2024-98 Key Management Contract
- 6.1.3.5. Resolution 2024-99 Custodial Services Pool, Renewal
- 6.1.3.6. Resolution 2024-100 Residential HVAC Services
- 6.1.3.7. Resolution 2024-101 Yardi ScreeningWorks Pro
- 6.1.3.8. Resolution 2024-102 Legal Services Contracts

6.1.4. Development/External Affairs/Public Relations Committee Resolutions

- 6.1.4.1. Resolution 2024-103 Option Agreements for Vacant Spencer Property
- 6.1.4.2. Resolution 2024-104 Bond Inducement for Columbus Park
- 6.1.4.3. Resolution 2024-105 T-Mobile Tower Leases
- 6.1.4.4. Resolution 2024-106 SST Phase 3 Bond Inducement Resolution Revision

Chair Levy questioned if any resolutions need pulled from Consent.

MOTION by Commissioner Dougherty, seconded by Commissioner Taylor, to approve the Consent Agenda.

Motion passed. Aye-4, Nay-0

Commissioner Taylor – Aye

Commissioner Dougherty – Aye

Commissioner Johnson – Aye

Commissioner Levy – Aye

6.2. ADDITIONAL ITEMS FOR CONSIDERATION:

6.2.1. Resolution 2024-107 FY 2023 Audit

No action was taken on this item.

6.2.2. Resolution 2024-108 Insurance Broker & Consulting Services, Renewal

Mr. Hansen stated that OHA staff recommend approval of a contract increase and renewal for the final one-year term with Gallagher to serve as our Broker of Record for insurance. Mr. Hansen stated that OHA staff plan to issue an RFP in 2025.

MOTION by Commissioner Johnson, seconded by Commissioner Dougherty, to approve Resolution 2024-108 Insurance Broker & Consulting Services, Renewal

Motion passed. Aye-4, Nay-0

Commissioner Taylor – Aye

Commissioner Dougherty – Aye

Commissioner Johnson – Aye

Commissioner Levy – Aye

6.2.3. Resolution 2024-109 Bond Inducement for Pine Tower

Mr. Hansen explained that OHA is planning a renovation and repositioning of OHA's Pine Tower through the Rental Assistance Demonstration (RAD) program. Mr. Hansen explained this resolution is to issue bonds not to exceed \$23M. Mr. Hansen clarified that there will be many more approvals after this, but this starts the process.

MOTION by Commissioner Dougherty, seconded by Commissioner Taylor, to approve Resolution 2024-109 Bond Inducement for Pine Tower

Motion passed. Aye-4, Nay-0

Commissioner Taylor – Aye

Commissioner Dougherty – Aye

Commissioner Johnson – Aye

Commissioner Levy – Aye

7. DEPARTMENT REPORTS AND DISCUSSION ITEMS:

Department Reports were provided to the board.

Chair Levy stated the board will now take public comments.

Francine Guerro from Jackson Tower spoke about safety concerns and behavior of fellow tenants at Jackson Tower. Nick Berry from Jackson Tower expressed gratitude to OHA staff and board members.

Ms. Poore spoke of the recent HUD site visit and noted that resident commissioner recommendations had been sent to the Mayors Office. Ms. Poore stated that the draft CY2025 Budget will be to the committee next week.

Chair Levy questioned if there was a need for an Executive Session. Mr. Hansen stated there was no need for it.

8. EXECUTIVE SESSION:

There was no Executive Session.

9. ADJOURNMENT:

MOTION by Commissioner Taylor, seconded by Commissioner Johnson to adjourn the meeting at 8:49 a.m.

Motion passed. Aye-4, Nay-0

Commissioner Taylor – Aye

Commissioner Dougherty – Aye

Commissioner Johnson – Aye

Commissioner Levy – Aye

6.1.2. Finance/Procurement/Operations Committee Resolutions

6.1.2.1. Resolution 2024-111 OHA Past Due Write-Offs

Property/Resident Codes	Payment Plans	Late Fees	Legal Fees	Maintenance Charges	Cleaning/Moveout Charges	Rent	Security Deposits	subsidy	Grand Total	Explanation of larger balances over \$1200.00
Ernie Chambers	9682	420		3769		11536.57		672.5	26080.07	
t0077470 Nov		175 175		1360 1360		6227 6227			7762 7762	6 months rent/trash out-cleaning & legal fees
t0068491 Nov		245 245		886 886		5197.57 5197.57			6328.57 6328.57	6 months rent/trash out-cleaning & legal fees
t0081880 Nov				1523 1523				672.5 672.5	2195.5 2195.5	personal property removal, cleaning, maintenance
t0082571 Nov	9682 9682					112 112			9794 9794	Utilities written off after resident paid back 25%
Benson Towers				959		1758			2717	
t0086118 Nov						402 402			402 402	
x0071682 Dec						100 100			100 100	
t0073618 Nov				959 959		1256 1256			2215 2215	3 months rent, personal property removal, storage fees, cleaning
Crown Towers			587	924.93		876			2387.93	
t0085080 Nov			587 587	924.93 924.93		814 814			2325.93 2325.93	2.5 months rent, personal property removal, cleaning, legal fees
t0064015 Nov						62 62			62 62	
Evans Tower			600			1290 1090			2980	
t0000546 Oct			600 600			1290 1090			2980 2980	3.5 months rent, personal property removal, cleaning, legal fees
Florence Towers		105	600			977	2018		3700	
t0076896 Oct						127 127			127 127	
x0080687 Nov			600 600			325 325	515 515		1440 1440	2 months rent, personal property removal, legal fees
t0054335 Oct						307 307			307 307	
t0078783 Nov		105 105				525 525	1196 1196		1826 1826	4 months rent, personal property removal, cleaning

Jackson Tower	535	600	7290	3422	11847	
t0082013			182		182	
Oct			182		182	
t0043080	145		480	290	915	
Oct	145		480	290	915	
t0057128	35		715	2012	2762	8 months rent, personal
Oct	35		715	2012	2762	property removal, cleaning
t0081532			87		87	
Nov			87		87	
t0093945	35		1240	322	1597	paint, personal property
Nov	35		1240	322	1597	removal, maintenance
t0059738	320	600	4300	798	6018	items, cleaning
Oct	320	600	4300	798	6018	16 months Bio-hazard
t0070598			286		286	clean up, legal fees
Oct			286		286	
KayJay	270		535	350	1155	
t0059263				350	350	
Oct				350	350	
t0069765	270		535		805	
Sep	270		535		805	
Park Villa			264		264	
t0086188			264		264	
Oct			264		264	
Park South	300		1849	2943	5092	
t0074929	105		140	1862	2107	7 months rent. Cleaning
Oct	105		140	1862	2107	fees
t0013349	35		635	261	931	
Oct	35		635	261	931	
t0074649	70			370	440	
Nov	70			370	440	
t0032924	90		1074	450	1614	9 months rent, personal
Oct	90		1074	450	1614	property removal, cleaning
Pine Tower	35		2076.12	390	2501.12	fees, storage
t0083184	35		1469	390	1894	1 months rent, storage
Oct	35		1469	390	1894	fees, cleaning
t0033074			607.12		607.12	
Oct			607.12		607.12	
Scatter Site North East	770		2643	12415	15828	
t0074568	35		663	262	960	
Nov	35		663	262	960	
t0079423	70		1010	2015	3095	2.5 months rent, personal
						property removal, cleaning

Nov	70	1010	2015	3095	
t0079687	350	970	9013	10333	10 months rent/personal
Oct	350	970	9013	10333	property removal, cleaning
t0066844	315		1125	1440	5 months rent/late fees
Nov	315		1125	1440	
Scatter Site North West		5140		5140	
t0059642		734		734	
Oct		734		734	
t0033895			215	215	
Nov			215	215	
Southside	175	2779.38	5521	9119.38	
x0074474	35	1016.38	1057	2108.38	2 months rent, personal
Nov	35	1016.38	1057	2108.38	property removal
q0076591		12		12	
Oct		12		12	
x0072430			50	50	
Oct			50	50	
x0074351		85	17	102	
Sep		85	17	102	
q0000666	35	92		127	
Nov	35	92		127	
y0020572			150	150	
Feb			150	150	
x0057458		90		90	
Nov		90		90	
x0035186		586		586	
Nov		586		586	
t0056409	70	180	1747	1997	7 months rent. Cleaning
Oct	70	180	1747	1997	fees
x0067106	35	137		172	
Nov	35	137		172	
x0072964		579		579	
Nov		579		579	
x0082269		2		2	
Oct		2		2	
Underwood	175	350	753	2306	
t0068297	175	350	2306	2831	8 months rent, legal fees
Nov	175	350	2306	2831	
t0047937		753		753	
Nov		753		753	
pn			49	49	
v0010152			49	49	
Dec			49	49	
scsw			233	1004	
w0064407				771	
Oct				771	
t0035552			233	233	
Sep			233	233	

Grand Total	9682	2785	2737	25450.05	5799.38	45073.57	49	672.5	93663.5

RESOLUTION No 2024-111
AUTHORIZATION TO CHARGE OFF
VACATED TENANT ACCOUNT RECEIVABLES

WHEREAS a list of Charge Off for Vacated Tenant Account Receivables as of August 26, 2024, has been presented to the Board of Commissioners of the Housing Authority of the City of Omaha (Board); and

WHEREAS the total charge-off for this period is \$93,663.40. which represents 53 tenants: and

WHEREAS it is necessary to charge off said amounts to comply with the findings of the Office of the Inspector General of the U.S. Department of Housing and Urban Development.

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Commissioners of the Housing Authority of the City of Omaha that the CEO be authorized to grant approval for the total amount charged for all OHA properties.

This Resolution shall take effect immediately.

David Levy, Chair
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held December 19, 2024.

Joanie Balk, Secretary
Housing Authority of the City of Omaha

6.1.2.2. Resolution 2024-112 Fire Safety & Suppression, Renewal

Memorandum



To: The OHA Board of Commissioners

From: Jennifer Dexter, Procurement Manager

Date: December 19, 2024

Re: Recommendation for Contract Renewal – Fire Detection and Suppression

RECOMMENDED ACTION:

The Housing Authority of the City of Omaha (hereinafter “OHA”) staff recommends the OHA Board of Commissioners approve a contract renewal with FireGuard, LLC for Fire Detection and Suppression services for an amount not to exceed \$310,000.00. This contract extension is for a term of (1) one year with the option to renew for (2) two additional (1) one-year terms with the approval of the Board of Commissioners.

PREVIOUS ACTION:

Action	Resolution	Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Expire Date
Contract 23-FIREDT-04	2023-04	2/6/2023	\$310,000	\$310,000	4	1	2/5/2024
First Renewal	2023-113	2/6/2024	\$310,000	\$620,000	3	1	2/5/2025

PROPOSED ACTION:

Action	Resolution	Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Expire Date
Second Renewal	2024-TBD	2/6/2025	\$310,000	\$930,000	2	1	2/5/2026

PROJECT COST:

Company Name	MBE/ WBE	Section 3 Business	Expended as of 11/30/2024
FireGuard, LLC	No	No	\$613,065

METHOD OF PROCUREMENT: Renewal

SPONSOR(S): Jennifer Dexter, Procurement Management
Michael Wehling, Senior Director of Housing Operations

RECOMMENDED BY: Joanie Balk, CEO

RESOLUTION NO. 2024 - 112
RENEWAL OF CONTRACT FOR FIRE DETECTION & SUPPRESSION SERVICES

WHEREAS, the Housing Authority of the City of Omaha (“OHA”) currently has a contract with FireGuard, LLC to provide fire detection and suppression services for OHA properties;

WHEREAS, the contract was effective beginning February 2023 for a one-year term with an option for renewal for four additional one-year terms;

WHEREAS, the current contract will expire in February 2025, and staff recommends renewal of the contract for an additional one-year term;

WHEREAS, the previous cumulative amount of the contract was \$620,000.00, and staff recommends increasing the funding by an additional \$310,000, for a total cumulative contract amount of \$930,000; and

WHEREAS, OHA staff recommends that the Board of Commissioners approve a one-year renewal of the contract with FireGuard, LLC, with an increase in the contract amount of \$310,000, to provide fire detection and suppression services for OHA properties;

NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves a one-year renewal of the contract with FireGuard, LLC, with an increase in the contract amount of \$310,000, to provide fire detection and suppression services for OHA properties.

David Levy, Chairman
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held December 19, 2023.

Joanie Balk, Secretary
Housing Authority of the City of Omaha

6.1.2.3. Resolution 2024-113 Commercial HVAC, Renewal

RESOLUTION NO. 2024 - 113
RENEWAL OF CONTRACT FOR COMMERCIAL HVAC SERVICES

WHEREAS, the Housing Authority of the City of Omaha (“OHA”) currently has a contract with Hayes Commercial, LLC to provide commercial HVAC services for OHA properties;

WHEREAS, the contract was procured in 2022 for a one-year term with an option to renew for four additional one-year terms;

WHEREAS, the current contract will expire in February 2025, and staff recommends renewal of the contract for an additional one-year term;

WHEREAS, the previous cumulative amount of the contract was \$1,165,000, and staff recommends increasing the funding by an additional \$550,000, for a total cumulative contract amount of \$2,200,000; and

WHEREAS, OHA staff recommends that the Board of Commissioners approve a one-year renewal of the contract with Hayes Commercial, LLC with an increase in the contract amount of \$550,000, to provide commercial HVAC services for OHA properties;

NOW, THEREFORE, BE IT RESOLVED that the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves a one-year renewal of the contract with Hayes Commercial, LLC, with an increase in the contract amount of \$550,000, to provide commercial HVAC services for OHA properties.

David Levy, Chairman
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held December 19, 2024.

Joanie Balk, Secretary
Housing Authority of the City of Omaha

6.1.2.4. Resolution 2024-114 Relocation Specialist Services, Renewal

Memorandum



To: The OHA Board of Commissioners

From: Jennifer Dexter, Procurement Manager

Date: December 19, 2024

Re: Recommendation for Contract Renewal – URA Relocation Specialist

RECOMMENDED ACTION:

The Housing Authority of the City of Omaha (hereinafter “OHA”) staff recommends the OHA Board of Commissioners approve a contract renewal with CVR Associates, Inc. for URA Relocation Specialist Services. The amount of the extension would not exceed \$2,500,000.00 and will extend the contract through the end of the Choice Neighborhood Implementation Grant at Southside Terrace, currently September 30, 2029. The renewal of this contract has been approved by HUD as it exceeds the HUD-allowed contract period which is a total of (5) five years.

PREVIOUS ACTION:

Action	Resolution	Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Expire Date
Contract 19-Relocat-62	2019-62	12/20/2019	\$1,100,000	\$1,100,000	0	1	12/19/2024

PROPOSED ACTION:

Action	Resolution	Effective Date	Amount	Cumulative Amount	Renewals available	No. of Vendors	Expire Date
First Renewal	2024–TBD	12/20/2024	\$2,500,000	\$3,600,000	0	1	9/30/2029

PROJECT COST:

Company Name	MBE/WBE	Section 3 Business	Expended as of 11/30/2024
CVR Associates, Inc.	No	No	\$1,071,423

METHOD OF PROCUREMENT: Renewal

SOURCE OF FUNDS: The operating budgets of all OHA departments.

SPONSOR(S): Jennifer Dexter, Procurement Manager
Brian Hansen, General Counsel

RECOMMENDED BY: Joanie Balk, CEO



Omaha Housing Authority

1823 Harney St ~ Omaha, NE 68102- ~ 402.444.6900 ~ www.ohauthority.org

Omaha Field Office
Attention: Denise Gipson
U.S. Dept of HUD
1616 Capitol Ave Suite 329
Omaha, NE 68102-4908

Hello, Ms. Gipson,

I am writing to formally request an extension of OHA's contract for URA Relocation Specialist Services. This contract is set to expire on December 19, 2024. OHA is requesting the HUD Field Office exercise the ability to allow the contract to exceed the 5-year contract limit set within Section 10.8, C, #2 in the Procurement Handbook 7460.8 Rev 2. The same Section provides the HUD Field Office with the ability to determine the lack of practical alternatives to extending the contract.

The relocation service provided by this contract was solicited to complete the relocation for the CNI Grant awarded for the area that includes OHA's property, Spencer Homes. OHA initiated the application process for the CNI Grant for the south area of Omaha, including Southside Terrace, in June of 2019 with the planning grant application. The selected contractor for relocation services was meant to assist OHA through the upcoming CNI Grant relocation efforts. In the solicitation, OHA stated the intention to award one contract to a single provider to begin in 2019 and "continue throughout the duration of the projects." The expiration for the Spencer CNI Grant is September 30, 2026 and Southside is set to expire September 30, 2029.

OHA has developed a relationship with CVR Associates, Inc. as a result of this solicitation award. Over approximately the last five years, comprehensive policies and strategies related to relocating Southside Terrace and Spencer Homes residents have been established. Transitioning to a new vendor at this point would be impractical and potentially detrimental to our ongoing projects. The continuity provided by the current vendor ensures a stable relationship with OHA residents and staff, which is essential for maintaining trust and effectiveness. CVR has staffed the Southside Terrace relocation effort with a local hire specific to the project who is even able to meet with the residents on the property as needed. The staff has gotten to know the residents they are working with and their personal circumstances. Requiring a new solicitation process, which could result in the selection of a new contractor, has the potential to disrupt services and negatively impact OHA's residents and the overall efforts of the Choice Neighborhood Implementation grants.

Given the complexity of the CNI projects involved, the reality that relocation is a very significant component of the CNI Grants, and the positive feedback from stakeholders, OHA

believes extending the contract with CVR for resident relocation beyond the five-year limit is not only warranted and beneficial but would be impractical to do otherwise. This would provide the necessary time and resources to ensure the continued success of the Choice Neighborhood Implementation grant and to further support the community we serve.

Thank you for considering this request. I look forward to your favorable response.

With Sincere Regards,

A handwritten signature in black ink, appearing to read 'J. Dexter', enclosed within a large, loopy oval shape.

Jennifer Dexter
Procurement Manager



U.S. Department of Housing and Urban Development

Omaha Field Office
Edward Zorinsky Building
1616 Capitol Avenue, Suite 329
Omaha, Nebraska 68102-4908

November 1, 2024

Joanie Poore, Executive Director
Omaha Housing Authority
1823 Harney Street
Omaha, NE 68102
jpoore@ohauthority.org

Dear Ms. Poore:

Thank you for Omaha Housing Authority's (OHA) correspondence dated October 2, 2024, wherein OHA requested the Omaha Office of Public Housing (Omaha OPH) approves an extension of a relocation specialist contract with CVR Associates. The contract supports relocation associated with the Choice Neighborhood Implementation grant. The request was to extend the agreement to September 30, 2029, to complete relocation associated with the Choice Neighborhood grant at Southside Terrace and Spencer Homes.

OHA's request has been reviewed in accordance with 2 CFR §200. OHA provided significant justification for this extension request. Omaha OPH has determined that it would be impractical to change relocation consultants in the middle of the relocation project. Therefore, Omaha OPH approves OHA's request for extending this contract for relocation of residents associated with the Choice Neighborhood Implementation grant at Southside Terrace and Spencer Homes. This approval is to extend the length of the contract only and does not approve changes to scope or other terms of the original contract as procured.

If you have questions, please contact Denise Gipson, Director Office of Public Housing at Denise.E.Gipson@hud.gov or by telephone at 402-492-3137

Sincerely,



Recoverable Signature

X

Denise E. Gipson

Denise E. Gipson

Signed by: DENISE GIPSON

Denise Gipson
Director
Office of Public Housing

RESOLUTION NO. 2024 – 114
RENEWAL FOR RELOCATION SERVICES

WHEREAS, the Housing Authority of the City of Omaha (“OHA”) currently has a contract with CVR Associates, Inc. to provide relocation services for Spencer Homes and Southside Terrace;

WHEREAS, the contract was effective beginning December 2019 for a five-year term;

WHEREAS, , the current contract will expire in December 2024, and staff recommends renewal of the contract for an additional five-year term;

WHEREAS, , the previous cumulative amount of the contract was \$1,100,000, and staff recommends increasing the funding by an additional \$2,500,000, for a total cumulative contract amount of \$3,600,000; and

WHEREAS, OHA staff recommends that the OHA Board of Commissioners approve a contract with CVR Associates, Inc. to provide relocation services for Spencer Homes and Southside Terrace in an amount not to exceed \$2,500,000; and

WHEREAS, OHA staff recommends that the Board of Commissioners approve a five-year renewal of the contract with CVR Associates, Inc., with an increase in the contract amount of \$2,500,000, to provide relocation services for Spencer Homes and Southside Terrace;

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Commissioners of the Housing Authority of the City of Omaha hereby approve a five-year renewal of the contract with CVR Associates, Inc., with an increase in the contract amount of \$2,500,000, to provide relocation services for Spencer Homes and Southside Terrace.

David Levy, Chairman
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the regular meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held December 19, 2024.

Joanie Balk, Secretary
Housing Authority of the City of Omaha

6.1.2.5. Resolution 2024-115 Property and Liability Insurance Renewal

Memorandum



To: The Board of Commissioners

From: Brian Hansen, General Counsel

Date: December 19, 2024

Re: Commercial Property and Liability Insurance Renewals

RECOMMENDED ACTION:

Staff of the Housing Authority of the City of Omaha (OHA) recommend that the Board of Commissioners approve the renewal of OHA's policy with the Housing Authority Insurance Group (HAIG) for commercial property insurance covering all OHA properties. This premium amount is \$781,876.00.

Staff also recommend that the Board of Commissioners approve its policy renewal with HAIG for commercial liability insurance covering all OHA properties. This premium amount is \$181,575.

PREVIOUS ACTION:

Rates quoted are based on actuarial assessment of historic losses. The commercial policies were renewed for the 2024 calendar year at a rate of \$697,884.00 for property and \$169,274.00 for liability insurance.

EXPLANATION:

OHA and HIO have obtained their property and liability insurance through HAIG for several years. HAIG is an insurance cooperative formed to insure the specific needs of housing authorities. Because HAIG is a HUD-approved vendor, these insurance policies do not require further procurement.

SOURCE OF FUNDS: Operations Budgets

RECOMMENDED BY: Brian Hansen, General Counsel
Joanie Balk, CEO

RESOLUTION NO. 2024 - 115
RENEWAL OF OHA PROPERTY AND LIABILITY INSURANCE POLICY

WHEREAS, the Housing Authority of the City of Omaha (OHA) wishes to maintain commercial property and liability insurance for 2025 for properties owned by OHA;

WHEREAS, OHA's current insurance policies are provided by the Housing Authority Insurance Group (HAIG) which is a HUD-approved vendor and therefore renewal of policies does not require procurement; and

WHEREAS, staff recommends that the Board of Commissioners approve renewal of OHA's commercial property insurance policy for 2025 for a proposed annual premium of \$781,876.00, and that the Board of Commissioners approve renewal of OHA's commercial liability insurance policy for 2025 for a proposed annual premium of \$181,575.00;

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves renewal of OHA's commercial property insurance policy for 2025 for a proposed annual premium of \$781,876.00, and that the Board of Commissioners approve renewal of OHA's commercial liability insurance policy for 2025 for a proposed annual premium of \$181,575.00.

David Levy, Chairperson
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary, do hereby certify that this resolution was properly adopted at the meeting of the Board of Directors of Housing in Omaha, Inc. held December 19, 2024.

Joanie Balk, Secretary
Housing Authority of the City of Omaha

6.1.2.6. Resolution 2024-116 Auto Insurance Policy Renewal

Memorandum



To: The Board of Commissioners

From: Brian Hansen, General Counsel

Date: December 19, 2024

Re: Auto Insurance Renewals

RECOMMENDED ACTION:

Staff recommends the OHA Board of Commissioners approve renewal of an insurance policy with the Travelers Insurance Company for one year of vehicle insurance covering all OHA and HIO vehicles. The renewal premium is \$196,164.00 based on a projected fleet of 81 vehicles.

EXPLANATION:

The 2024 premium for 71 vehicles was \$154,603.00. OHA's insurance broker notes that the 15.5% increase for 2025 with the additional number of OHA vehicles is consistent with trends they have observed all year.

SOURCE OF FUNDS: Operations Budgets

RECOMMENDED BY: Brian Hansen, General Counsel
Joanie Balk, CEO

RESOLUTION NO. 2024 – 116
VEHICLE INSURANCE – TRAVELERS AUTO INSURANCE

WHEREAS, the Housing Authority of the City of Omaha (OHA) seeks to maintain an insurance policy to provide coverage on OHA owned vehicles for the period of January 1, 2025 through December 31, 2025;

WHEREAS, OHA’s current provider, Travelers Insurance, has quoted a renewal premium of \$196,164.00 based on a projected fleet of 81 vehicles;

WHEREAS, funding will be allocated from the Operations Budgets; and

WHEREAS, OHA staff recommends that the Board of Commissioners approve the renewal of its insurance policy with Travelers Insurance to provide vehicle insurance for an estimated premium rate of \$196,164.00, based on a projected fleet of 81 vehicles, for the period of January 1, 2025, through December 31, 2025;

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves renewal of its insurance policy with Travelers Insurance to provide vehicle insurance for an estimated premium rate of \$196,164.00, based on a projected fleet of 81 vehicles, for the period of January 1, 2025, through December 31, 2025.

David Levy, Chairman
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held December 19, 2024.

Joanie Balk, Secretary
Housing Authority of the City of Omaha

6.2. ADDITIONAL ITEMS FOR CONSIDERATION

6.2.1. Resolution 2024-110 FY2025 Budget

Omaha Housing Authority

2025 Budget Narrative

Revenue

- PH Operating Subsidy based on 2025 initial budget submissions to HUD (under review at HUD). Most AMPs are projecting a lower operating subsidy in 2025 vs. 2024 due to lower utilities in the current reference period and a much lower inflation factor than in recent previous years.
- Due to asset repositioning, several AMPs are slated to receive less operating subsidy & tenant rent than during 2024. See Asset Repositioning Effects for a detailed review.
- Assumed tenant rent equal to 2024 annualized except in cases of demolition or disposition.
- Projected River City Developer's Fees to increase 20% over 2024; non-payroll expenses increasing correspondingly.
- No gain/loss budgeted for sale of scattered site homes.
- Capital Funds – only soft cost (revenue) & corresponding soft cost expense are budgeted; hard costs get capitalized on each property's balance sheet.
- HCV programs are based off recent Two-Year Tool & projected shortfall.

Expenses

- OHA averages thirteen open positions at any given time; for budgetary purposes six open positions assumed at any given time.
- 3% increase in compensation effective 1-1-2025.
- Facilities Operations Manager replaced with COO (projected increase \$63k/year).
- Medical insurance premiums projected 9% increase with OHA bearing burden of entire increase.
- Assumed 100% staffing at sold & demolished locations; normal attrition will allow us to shift staff as needed.
- Removed pro-rata portion of all other expenses at sold & demolished locations.
- HCV 100% staffed. Will reevaluate as needed.
- Used a 3% inflationary increase on non-payroll & benefits operating expenses.

Projected Adjusted Net Operating Income: \$26,742

COCC Projected Adjusted Net Operating Income: \$196,671

PH & Capital Funds Projected Adjusted Net Operating Loss: \$165,870

Housing Choice Voucher Projected Adjusted Net Operating Loss: \$4,059

Omaha Housing Authority

2025 Budget

Agency-Wide

Business Unit Roll-up	January - September 2024 Actual	Annualized 2024 Projection	Budget 2025	2024 Projected vs. 2025 Budget Variance		Footnote Item #
Agency-Wide						
REVENUES						
TENANT REVENUES						
DWELLING RENTS	5,721,096	7,628,128	6,974,786	(653,342)	-9%	1
DWELLING RENTS SUBSIDY	327,167	436,223	336,363	(99,860)	-23%	1
TPA DAMAGE	(50)	(67)	-	67	-100%	
LATE FEES	152,646	203,528	202,991	(537)	0%	
LATE FEES {P-NOTES}	550	733	931	198	27%	
LEGAL FEES	35,741	47,655	49,813	2,158	5%	
MAINTENANCE FEES	166,974	222,632	210,131	(12,501)	-6%	
OTHER TENANT REVENUE	41,748	55,664	50,776	(4,888)	-9%	
BAD DEBT RECOVERY	-	-	-			
FRAUD RECOVERY REVENUE	1,458	1,944	2,823	879	45%	
TOTAL TENANT REVENUES	6,447,330	8,596,440	7,828,614	(767,826)	-9%	
HUD GRANTS AND SUBSIDY						
REVENUES-HUD SUBSIDY	7,056,895	9,409,193	8,367,414	(1,041,779)	-11%	1
HOUSING ASST PAYMENTS	32,370,393	43,160,524	43,303,483	142,959	0%	
ONGOING ADMIN FEES EARNED	2,731,190	3,641,587	3,508,460	(133,127)	-4%	
REVENUES - HUD CAPITAL - HARD COSTS	1,799,486	2,399,315	-	(2,399,315)	-100%	2
REVENUES - HUD CAPITAL - SOFT COSTS	2,969,193	3,958,924	3,377,896	(581,028)	-15%	3
TOTAL HUD GRANTS AND SUBSIDY	46,927,157	62,569,543	58,557,253	(4,012,290)	-6%	
TOTAL FEE REVENUE						
MANAGEMENT FEE	1,643,901	2,191,868	2,121,176	(70,692)	-3%	1
BOOKKEEPING FEE	453,240	604,320	572,408	(31,912)	-5%	1
FRONT LINE SERVICE FEE	1,811,466	2,415,288	2,726,929	311,641	13%	13
FRONT LINE SERVICE FEE {IT}	81,587	108,783	82,703	(26,080)	-24%	4
OTHER FEES FOR SERVICE	14,484	19,312	62,877	43,565	226%	
TOTAL FEE REVENUE	4,004,678	5,339,571	5,566,093	226,522	4%	
OTHER GOV'T GRANTS/DONATIONS						
OTHER GOV'T GRANTS/DONATIONS	669,129	892,172	2,955,780	2,063,608	231%	5
TOTAL OTHER GOV'T GRANTS DONATIONS	669,129	892,172	2,955,780	2,063,608	231%	
INVESTMENT INCOME						
INTEREST INCOME - MAIN	26,375	35,167	35,878	711	2%	
TOTAL INTEREST INCOME - MAIN	26,375	35,167	35,878	711	2%	
INTEREST INCOME - OTHER						
INTEREST INCOME - OTHER	108,043	115,561	107,856	(7,705)	-7%	
TOTAL NON-CASH INT INCOME	108,043	115,561	107,856	(7,705)	-7%	
INTEREST INCOME - RESTRICTED FUNDS						
INT INCOME - RESTRICT FUNDS	10,991	14,655	15,089	434	3%	
OTHER INCOME						

NON-DWELLING RENTS	325,518	434,024	450,759	16,735	4%	
MISCELLANEOUS INCOME	1,283	1,711	1,751	40	2%	
COMMISSION INCOME	51,436	68,581	72,693	4,112	6%	
ADMINISTRATIVE FEES	15,753	21,004	21,626	622	3%	
DONATIONS - GENERAL	254	339	28	(311)	-92%	
MISCELLANEOUS GRANT REVENUE	67,400	89,867	84,000	(5,867)	-7%	
DEVELOPERS FEES	544,932	726,576	726,576	0	0%	
GAIN/LOSS ON SALE OF FIXED ASSET	67,043	89,391	-	(89,391)	-100%	6
INSURANCE PROCEEDS	214,289	285,719	-	(285,719)	-100%	6
TOTAL OTHER INCOME	1,287,908	1,717,211	1,357,433	(359,778)	-21%	
TOTAL REVENUES	59,481,611	79,280,318	76,423,996	(2,856,322)	-4%	
EXPENSES						
OPERATING EXPENSES						
ADMINISTRATIVE EXPENSES						
ADMINISTRATIVE SALARIES						
ADMIN SALARIES	4,669,236	6,225,648	7,276,134	1,050,486	17%	7
ADMIN CASUAL LABOR	20,750	-	385,423	385,423		8
TOTAL ADMIN SALARIES	4,689,986	6,225,648	7,661,557	1,435,909	23%	
AUDIT EXPENSE	85,230	113,640	114,046	406	0%	
MANAGEMENT FEE	1,643,901	2,191,868	2,121,176	(70,692)	-3%	9
BOOKKEEPING FEE	453,240	604,320	572,408	(31,912)	-5%	9
NIFA MONITORING FEE	4,020	5,360	7,098	1,738	32%	
TOTAL ADMINISTRATIVE FEE	2,186,391	2,915,188	2,814,728	(100,460)	-3%	
ADMIN EMPLOYEE BENEFITS	51,687	68,916	63,513	(5,403)	-8%	
ER MEDICAL/DENTAL INS - ADMIN	1,103,734	1,471,645	1,583,380	111,735	8%	
ER PENSION - ADMIN	123,726	164,968	400,187	235,219	143%	
ER TAXES-ADMIN	620,501	827,335	556,624	(270,711)	-33%	
TOTAL ADMIN EMPLOYEE BENEFITS	1,899,648	2,532,864	2,603,704	70,840	3%	
LEGAL SERVICES - OUTSIDE	109,459	145,945	152,192	6,247	4%	
TRAINING/CONFERENCE	84,405	112,540	86,244	(26,296)	-23%	
STAFF MEETING/RETREAT	3,126	4,168	4,540	372	9%	
TRAVEL	25,814	34,419	28,782	(5,637)	-16%	
MILEAGE	6,461	8,615	8,724	109	1%	
ADMIN VEHICLE - FUEL	343	457	542	85	19%	
ADMIN VEHICLE - MTCE & REPAIR	2,131	2,841	3,229	388	14%	
ADMIN VEHICLE - LICENSE	63	84	101	17	20%	
PUBLICATIONS	1,295	1,727	1,782	55	3%	
MEMBERSHIPS	14,065	18,753	30,039	11,286	60%	
PAYROLL PROCESSING FEE	48,439	64,585	63,732	(853)	-1%	
TELEPHONE	146,228	194,971	172,826	(22,145)	-11%	
SAFETY EXPENSE	991	1,321	-	(1,321)	-100%	
SAFETY EQUIPMENT/SUPPLIES	18,927	25,236	17,206	(8,030)	-32%	
SAFETY TRAINING	117	156	207	51	33%	
LEGAL SERVICES - INTERNAL	138,721	184,961	202,340	17,379	9%	
ALLOC INTERNAL LEGAL EXP	32,559	43,412	40,503	(2,909)	-7%	
PRINTER SUPPLIES AND EXP	16,917	22,556	23,621	1,065	5%	
SOFTWARE EXP	204,971	273,295	219,203	(54,092)	-20%	
FORMS AND PRINTING	3,005	4,007	-	(4,007)	-100%	

OFFICE EXPENSE	7,540	10,053	10,870	817	8%	
OFFICE FURNISHINGS	17,855	23,807	8,431	(15,376)	-65%	
POSTAGE	56,734	75,645	74,042	(1,603)	-2%	
OFFICE SUPPLIES	44,790	59,720	58,129	(1,591)	-3%	
OFFICE EQUIPMENT LEASES	33,258	44,344	46,019	1,675	4%	
COMPUTER EQUIPMENT	68,067	90,756	78,774	(11,982)	-13%	
NETWORK COMMUNICATION	61,627	82,169	75,343	(6,826)	-8%	
ADVERTISING /NEWSPAPER ADS	1,294	1,725	1,958	233	13%	
CABLE TV	6,011	8,015	5,191	(2,824)	-35%	
EMPLOYEE HIRING & ADMIN EXP	29,399	39,199	40,908	1,709	4%	
CONSULTING	329,885	439,847	146,863	(292,984)	-67%	10
BANK FEE	9,636	12,848	15,326	2,478	19%	
SECT 8 PORT OUT ADMIN FEES	20,760	27,680	-	(27,680)	-100%	
LATE FEES	58,670	78,227	76,145	(2,082)	-3%	
MISCELLANEOUS EXPENSE	19,668	26,224	3,892	(22,332)	-85%	
FEES - PERMITS	2,371	3,161	4,187	1,026	32%	
PROPERTY TAX	19,368	25,824	33,623	7,799	30%	
RENTAL EXPENSE	28,081	37,441	27,707	(9,734)	-26%	
IT SUPPORT - CONTR SERV	149,218	198,957	223,212	24,255	12%	
PROFESSIONAL FEES	1,100	1,467	1,467	0	0%	
PROFESSIONAL/CONTR SERV	381	508	599	91	18%	
TOTAL OTHER ADMIN EXPENSES	1,823,750	2,431,667	1,988,499	(443,168)	-18%	
FEE FOR SERVICE	81,587	108,783	82,703	(26,080)	-24%	
TOTAL FEE FOR SERVICE	81,587	108,783	82,703	(26,080)	-24%	
TOTAL ADMINISTRATIVE EXPENSES	10,681,362	14,214,149	15,151,191	937,042	7%	
RESIDENT SERVICES SALARIES						
RESIDENT SERVICES SALARIES	38,417	51,223	55,553	4,330	8%	
RESIDENT SERVICE CASUAL LABOR	58,450	77,933	-	(77,933)	-100%	7
TOTAL RESIDENT SERV SALARIES	96,867	129,156	55,553	(73,603)	-57%	
RELOCATION EXPENSES	389,960	519,947	911,596	391,649	75%	11
RELOCATION - SECURITY DEPOSITS	7,019	9,359	12,394	3,035	32%	
RELOCATION - MOVING EXPENSE	5,666	7,555	4,532	(3,023)	-40%	
TOTAL RELOCATION EXPENSE	402,645	536,860	928,522	391,662	73%	
ER MEDICAL/DENTAL INS - RES SERV	16,661	22,215	23,756	1,541	7%	
ER PENSION - RES SERV	1,176	1,568	3,055	1,487	95%	
ER TAXES-RES SERV	4,714	6,285	4,250	(2,035)	-32%	
TOTAL RESIDENT SERV EMP BENEFITS	22,551	30,068	31,061	993	3%	
YOUTH ACTIVITIES - SCHOLARSHIPS	4,782	6,376	8,444	2,068	32%	
TOTAL YOUTH ACTIVITIES	4,782	6,376	8,444	2,068	32%	
RESIDENT SERVICES EXPENSE	380	507	93,880	93,373	18429%	5, 11
RESIDENT SERVICES EVENTS & ACTIVITIES	13,477	17,969	18,118	149	1%	
RESIDENT SERV DIRECT FUNDING	(130)	(173)	-	173	-100%	
RESIDENT FUND - STIPENDS	32,793	43,724	87,797	44,073	101%	12
RESIDENT FUND - MEETING EXPENSES	5,327	7,103	7,194	91	1%	
RESIDENT FUND - OTHER	6,451	8,601	35,226	26,625	310%	12
TOTAL RESIDENT FUND	58,298	77,731	242,215	164,484	212%	

FRONT LINE SERVICE FEE	1,501,637	2,002,183	2,195,011	192,828	10%	13
TOTAL FEE FOR SERVICE	1,501,637	2,002,183	2,195,011	192,828	10%	
TOTAL RESIDENT SERVICE EXPENSES	2,086,780	2,782,373	3,460,806	678,433	24%	
UTILITY EXPENSES						
UTILITY - WATER	355,842	474,456	426,706	(47,750)	-10%	9
UTILITY - ELECTRIC	1,355,220	1,806,960	1,637,178	(169,782)	-9%	9
UTILITY - GAS	212,862	283,816	282,082	(1,734)	-1%	9
UTILITY - SEWER	458,930	611,907	568,875	(43,032)	-7%	9
TOTAL UTILITY EXPENSES	2,382,854	3,177,139	2,914,841	(262,298)	-8%	
TOTAL MAINTENANCE						
MAINTENANCE SALARIES						
MAINTENANCE SALARIES	2,164,231	2,885,641	2,856,709	(28,932)	-1%	7
MAINTENANCE CASUAL LABOR	211,552	282,069	-	(282,069)	-100%	
ALLOC MAINT SALARIES	(45)	(60)	-	60	-100%	
TOTAL MAINTENANCE SALARIES	2,375,738	3,167,651	2,856,709	(310,942)	-10%	
APPLIANCES	187,136	249,515	244,074	(5,441)	-2%	
DWELLING EQUIPMENT	675	900	1,193	293	33%	
PAINT	62,062	82,749	76,966	(5,783)	-7%	
CLEANING SUPPLIES	23,067	30,756	30,822	66	0%	
HVAC MATERIALS	28,574	38,099	34,877	(3,222)	-8%	
LANDSCAPING MATERIALS	1,031	1,375	910	(465)	-34%	
PLUMBING MATERIALS	128,128	170,837	177,087	6,250	4%	
ELECTRICAL MATERIALS	51,518	68,691	76,892	8,201	12%	
GASOLINE USAGE FOR MAINT VEHICLES	38,172	50,896	41,868	(9,028)	-18%	
PEST CONTROL SUPPLIES	24,670	32,893	31,704	(1,189)	-4%	
MAINTENANCE TOOLS	14,057	18,743	19,983	1,240	7%	
MAINTENANCE MATERIALS	306,720	408,960	394,439	(14,521)	-4%	
MAINTENANCE EQUIPMENT	3,084	4,112	4,806	694	17%	
Early Pay Discount	(17,590)	(23,453)	(31,038)	(7,585)	32%	
TOTAL MAINTENANCE MATERIALS	851,304	1,135,072	1,104,583	(30,489)	-3%	
ELEVATORS - CONTRACTED SERV	98,490	131,320	119,912	(11,408)	-9%	
HVAC - CONTRACTED SERV	271,253	361,671	222,956	(138,715)	-38%	
LAWNS - CONTRACTED SERV	144,491	192,655	119,650	(73,005)	-38%	
MATS/UNIFORMS - CONTRACTED SVCE	7,186	9,581	5,792	(3,789)	-40%	
PEST CONTROL - CONTRACTED SERV	13,882	18,509	18,570	61	0%	
SNOW REMOVAL - CONTRACTED SERV	59,828	79,771	99,276	19,505	24%	
TRASH - CONTRACTED SERV	288,092	384,123	369,967	(14,156)	-4%	
LANDFILL FEES - CONTRACTED SERV	1,369	1,825	1,829	4	0%	
CLEANING - CONTRACTED SERV	463,798	618,397	669,269	50,872	8%	
PAINTING - CONTRACTED SERV	175,311	233,748	229,561	(4,187)	-2%	
ARBORIST - CONTRACTED SERV	66,645	88,860	55,307	(33,553)	-38%	
FLOORING REPL - CONTRACTED SERV	385,337	513,783	414,732	(99,051)	-19%	
OUTDOOR CLEANING - CONTRACTED SERV	19,267	25,689	18,664	(7,025)	-27%	
CONCRETE WORK - CONTRACTED SERV	5,495	7,327	4,268	(3,059)	-42%	
ELECTRICAL - CONTRACTED SERV	150,684	200,912	155,143	(45,769)	-23%	
LANDSCAPE - CONTRACTED SERV	32,095	42,793	54,890	12,097	28%	
PLUMBING - CONTRACTED SERV	200,124	266,832	439,781	172,949	65%	
ROOF REPAIRS - CONTRACTED SERV	33,344	44,459	265	(44,194)	-99%	
EXTERIOR REPAIRS - CONTRACTED SERV	21,092	28,123	1,360	(26,763)	-95%	

VEHICLE MAINTENANCE & REPAIR	39,809	53,079	52,682	(397)	-1%
MAINTENANCE EQUIPMENT REPAIR	6,829	9,105	7,295	(1,810)	-20%
WINDOWS/DOORS REPL - CONTRACTED SE	172,514	230,019	92,871	(137,148)	-60%
VACANT TURNOVER - CONTRACTED SERV	24,796	33,061	5,125	(27,936)	-84%
VACANCY REDUCTION - CONTRACTED SER'	1,700	2,267	-	(2,267)	-100%
INSPECTIONS - CONTRACTED SERV	15,893	21,191	17,622	(3,569)	-17%
INTERIOR REPAIRS - CONTRACTED SERV	405,022	540,029	78,227	(461,802)	-86%
Fire Safety - Contracted Services	243,104	324,139	229,992	(94,147)	-29%
HAZMAT - CONTRACTED SERV	446,229	594,972	5,798	(589,174)	-99%
RADON - CONTRACTED SERV	9,355	12,473	-	(12,473)	-100%
DWELLING/MECHANICAL UPGRADES - COM	974	1,299	1,721	422	33%
ALLOC INSPECTIONS EXPENSE	14,484	19,312	15,506	(3,806)	-20%
TOTAL MAINT SERVICES AND CONTRACTS	3,818,492	5,091,323	3,508,031	(1,583,292)	-31%
MAINTENANCE EMPLOYEE BENEFITS	(10)	(13)	905	918	-6888%
ER MED/DENTAL INS - MAINT	549,067	732,089	745,800	13,711	1.87%
ER PENSION - MAINT	54,992	73,323	157,119	83,796	114%
ER TAXES - MAINT	296,441	395,255	218,538	(176,717)	-45%
TOTAL MAINT EMPLOYEE BENEFITS	900,490	1,200,653	1,122,362	(78,291)	-7%
TOTAL MAINTENANCE EXPENSES	7,946,024	10,594,699	8,591,685	(2,003,014)	-19%
PROTECTIVE SERVICE EXPENSES					
PROTECTIVE SERVICE SALARIES					
SECURITY SALARY	126,523	168,697	304,396	135,699	80%
TOTAL PROTECTIVE SERV SALARIES	126,523	168,697	304,396	135,699	80%
FRONT LINE SERVICE FEES	309,829	413,105	531,919	118,814	29%
TOTAL FEE FOR SERVICE	309,829	413,105	531,919	118,814	29%
GUARDS - CONTRACTED SECURITY	14,344	19,125	507	(18,618)	-97%
SECURITY & MONITORING	32,637	43,516	39,730	(3,786)	-9%
SECURITY - CONTRACTED SERV	17,377	23,169	11,028	(12,141)	-52%
SECURITY EQUIPMENT & MATERIALS	103,632	138,176	100,071	(38,105)	-28%
TOTAL SECURITY EXPENSE	167,990	223,987	151,336	(72,651)	-32%
ER MEDICAL/DENTAL INS - SECURITY	18,956	25,275	32,218	6,943	27%
ER PENSION - SECURITY	2,738	3,651	16,742	13,091	359%
ER TAXES - SECURITY	20,641	27,521	23,286	(4,235)	-15%
TOTAL SECURITY EMPLOYEE BENEFITS	42,335	56,447	72,246	15,799	28%
TOTAL PROTECT SERVICE EXPENSES	646,677	862,236	1,059,897	197,661	23%
GENERAL EXPENSES					
INSURANCE EXPENSES					
INSURANCE - LIABILITY	113,375	151,167	151,899	732	0%
INSURANCE - PROPERTY	333,460	444,613	457,428	12,815	3%
INSURANCE - WORKERS COMP	196,935	262,580	259,779	(2,801)	-1%
TOTAL INSURANCE EXP	643,770	858,360	869,106	10,746	1%
BAD DEBT EXPENSE	438,767	585,023	561,711	(23,312)	-4%
TOTAL BAD DEBT EXPENSE	438,767	585,023	561,711	(23,312)	-4%
CLOSING COSTS	126	168	222	54	32%

MORTGAGE INTEREST	54,562	72,749	70,250	(2,499)	-3%	
TOTAL LOAN INTEREST	54,688	72,917	70,472	(2,445)	-3%	
TOTAL GENERAL EXPENSES	1,137,225	1,516,300	1,501,289	(15,011)	-1%	
TOTAL OPERATING EXPENSES	24,880,922	33,146,896	32,679,709	(467,187)	-1%	
NON-OPERATING EXPENSES						
HAP EXPENSES						
HAP EXPENSE	31,386,921	41,849,228	41,228,728	(620,500)	-1%	14
HAP EXPENSE - PORTABLE	395,498	527,331	530,295	2,964	1%	
UTILITY REIMBURSEMENT	1,494,855	1,993,140	1,958,518	(34,622)	-2%	
TOTAL HAP EXPENSES	33,277,274	44,369,699	43,717,541	(652,158)	-1%	
DEPRECIATION EXPENSE	2,294,108	3,058,811	2,983,626	(75,185)	-2%	
TOTAL DEPR & AMORT EXPENSE	2,294,108	3,058,811	2,983,626	(75,185)	-2%	
TOTAL NON-OPERATING EXPENSES	35,571,382	47,428,509	46,701,167	(727,342)	-2%	
TOTAL EXPENSES	60,452,304	80,575,405	79,380,876	(1,194,529)	-1%	
TRANSFERS BET PROGRAMS & PROJECTS - IN	(3,767,095)	(5,022,793)	(3,057,209)	1,965,584	-39%	
TRANSFERS BET PROGRAMS & PROJECTS - OU	3,767,095	5,022,793	3,057,209	(1,965,584)	-39%	
TOTAL TRANSFERS	-	-	-			
NET OPERATING INCOME (LOSS)	(970,693)	(1,295,087)	(2,956,880)	(1,661,793)	128%	
ADJUSTED NET OPERATING INCOME (LOSS)	1,323,415	1,763,724	26,742	(1,736,982)	-98%	

Generally, most reductions in non-payroll operating expense are due to demolition & disposition reductions

1 - reduction in projected revenue due to demolition & disposition

2 - no hard costs (revenue) budgeted in 2025; offset is capitalized on each PH property's balance sheet

3 - lower soft costs (revenue) not negative as revenue is 100% offset by expenses

4 - no IT Director budgeted

5 - CNIS grant

6 - no gain/loss on sale or insurance proceeds budgeted

7 - budgeted fully staffed

8 - CNIS contracted labor

9 - decrease due to demolition & disposition

10 - less CFO Systems usage for 2025

11 - Southside relocation

12 - increased stipends & resident expense for CNIS and REACH grants

13 - higher fee due to fewer open positions projected

Omaha Housing Authority
2025 Budget
COCC Business Unit Summary

Business Unit Roll-up	January - September 2024 Actual	Annualized 2024 Projection	Budget 2025	2024 Projected vs. 2025 Budget Variance		Footnote Item #
COCC						
REVENUE						
TENANT REVENUE	39,301	52,401	43,004	(9,397)	-18%	
FEE REVENUE	3,990,194	5,320,259	5,503,216	182,957	3%	
OTHER GOVERNMENT GRANTS & DONATIONS	511,596	682,127	2,739,519	2,057,392	302%	1
TOTAL OTHER INCOME	789,715	1,052,953	824,771	(228,182)	-22%	2
TOTAL REVENUE	5,330,806	7,107,741	9,110,510	2,002,770	28%	
EXPENSES						
TOTAL ADMINISTRATIVE EXPENSES	5,233,482	6,977,976	7,771,134	793,158	11%	3
TOTAL RESIDENT SERVICE EXPENSES	420,806	561,074	1,135,779	574,705	102%	4
TOTAL UTILITY EXPENSES	39,693	52,924	54,922	1,998	4%	
TOTAL MAINTENANCE EXPENSES	115,076	153,434	89,414	(64,021)	-42%	
TOTAL PROTECT SERVICE EXPENSES	181,020	241,360	392,528	151,168	63%	5
GENERAL EXPENSES						
TOTAL INSURANCE EXP	122,750	163,667	159,591	(4,075)	-2%	
TOTAL BAD DEBT EXPENSE	545	727	-	(727)	-100%	
TOTAL LOAN INTEREST	54,688	72,917	70,472	(2,445)	-3%	
TOTAL OPERATING EXPENSES	6,168,059	8,224,078	9,673,840	1,449,761	18%	
NON-OPERATING EXPENSES						
TOTAL HAP EXPENSES						
TOTAL DEPR & AMORT EXPENSE	125,166	166,888	169,098	2,210	1%	
TOTAL NON-OPERATING EXPENSES	125,166	166,888	169,098	2,210	1%	
TOTAL EXPENSES	6,293,225	8,390,966	9,842,938	1,451,971	17%	
TOTAL TRANSFERS	1,460,321	1,460,321	760,000	(700,321)	-48%	
NET OPERATING INCOME (LOSS)	497,902	663,869	27,572	(636,297)	-96%	
ADJUSTED NET OPERATING INCOME (LOSS)	623,068	830,757	196,671	(634,086)	-76%	

1 - CNIS grant

2 - no gain/loss on sale or insurance proceeds budgeted

3 - contracted services for CNIS

4 - resident relocation for CNIS

5 - 3 FTE additions in protective services

Omaha Housing Authority
2025 Budget
Public Housing & Capital Funds Business Unit Summary

Business Unit Roll-up	January - September 2024 Actual	Annualized 2024 Projection	Budget 2025	2024 Projected vs. 2025 Budget Variance	Footnote Item #
PUBLIC HOUSING & CAPITAL FUNDS					
REVENUE					
TENANT REVENUE	6,406,104	8,541,472	7,784,286	(757,186)	-9% 1
HUD GRANTS & SUBSIDY	11,825,574	15,767,432	11,745,310	(4,022,122)	-26% 1, 2
TOTAL OTHER INCOME	627,337	836,449	669,856	(166,594)	-20%
TOTAL REVENUE	18,859,015	25,145,353	20,199,452	(4,945,902)	-20%
EXPENSES					
TOTAL ADMINISTRATIVE EXPENSES	3,059,812	4,079,749	4,227,567	147,818	4%
TOTAL RESIDENT SERVICE EXPENSES	1,655,717	2,207,623	2,307,077	99,454	5%
TOTAL UTILITY EXPENSES	2,343,161	3,124,215	2,859,918	(264,297)	-8% 1
TOTAL MAINTENANCE EXPENSES	7,612,370	10,149,827	8,092,263	(2,057,564)	-20% 1
TOTAL PROTECT SERVICE EXPENSES	465,657	620,876	667,369	46,493	7% 3
GENERAL EXPENSES					
TOTAL INSURANCE EXP	485,448	647,264	665,391	18,127	3%
TOTAL BAD DEBT EXPENSE	438,222	584,296	561,711	(22,585)	-4% 1
TOTAL OPERATING EXPENSES	16,060,387	21,413,849	19,381,296	(2,032,553)	-9%
NON-OPERATING EXPENSES					
TOTAL HAP EXPENSES	174,833	233,111	224,026	(9,085)	-4%
TOTAL DEPR & AMORT EXPENSE	2,156,759	2,875,679	2,799,017	(76,662)	-3%
TOTAL NON-OPERATING EXPENSES	2,331,592	3,108,789	3,023,043	(85,746)	-3%
				-	
TOTAL EXPENSES	18,391,979	24,522,639	22,404,339	(2,118,300)	-9%
				-	
TOTAL TRANSFERS	(1,460,321)	(1,947,095)	(760,000)	1,187,095	-61%
				-	
NET OPERATING INCOME (LOSS)	(993,285)	(1,324,380)	(2,964,887)	(1,640,507)	-124%
				-	
ADJUSTED NET OPERATING INCOME (LOSS)	1,163,474	1,551,298	(165,870)	(1,717,169)	-111%

1 - reduction in projected revenue & expense due to demolition & disposition

2 - no hard costs (revenue) budgeted in 2025; offset is capitalized on each PH property's balance sheet

3 - 3 FTE adds in protective services during Q3 2024

Omaha Housing Authority
2025 Budget
Section 8 - Business Unit Summary

Business Unit Roll-up	January - September 2024 Actual	Annualized 2024 Projection	Budget 2025	2024 Projected vs. 2025 Budget Variance		Footnote Item #
SECTION 8 - HOUSING CHOICE VOUCHER PROGRAMS						
REVENUE						
TENANT REVENUE	1,680	2,240	1,324	(916)	-41%	1
HUD GRANTS & SUBSIDY	35,101,583	46,802,111	46,811,942	9,831	0%	
FEE REVENUE	14,484	19,312	62,877	43,565	226%	
OTHER GOVERNMENT GRANTS & DONATIONS	157,533	210,044	216,261	6,217	3%	
TOTAL OTHER INCOME	16,196	21,594	21,626	32	0%	
TOTAL REVENUE	35,291,476	47,055,301	47,114,030	58,729	0%	
EXPENSES						
TOTAL ADMINISTRATIVE EXPENSES	2,388,070	3,184,093	3,152,491	(31,602)	-1%	2
TOTAL RESIDENT SERVICE EXPENSES	10,257	13,676	17,950	4,274	31%	
TOTAL UTILITY EXPENSES	-	-	-			
TOTAL MAINTENANCE EXPENSES	218,576	291,435	410,008	118,573	41%	
TOTAL PROTECT SERVICE EXPENSES	-	-	-			
GENERAL EXPENSES						
TOTAL INSURANCE EXP	35,505	47,339	44,125	(3,214)	-7%	
TOTAL BAD DEBT EXPENSE	-	-	-			
TOTAL LOAN INTEREST	-	-	-			
TOTAL OPERATING EXPENSES	2,652,408	3,536,544	3,624,574	88,030	2%	
NON-OPERATING EXPENSES						
TOTAL HAP EXPENSES	33,102,441	44,136,588	43,493,515	(643,073)	-1%	
TOTAL DEPR & AMORT EXPENSE	11,633	15,511	15,510	(1)	0%	
TOTAL NON-OPERATING EXPENSES	33,114,074	44,152,099	43,509,025	(643,074)	-1%	
TOTAL EXPENSES	35,766,482	47,688,643	47,133,599	(555,044)	-1%	
TOTAL TRANSFERS	-	-	-			
NET OPERATING INCOME (LOSS)	(475,006)	(633,342)	(19,569)	613,773	97%	
ADJUSTED NET OPERATING INCOME (LOSS)	(463,373)	(617,831)	(4,059)	613,772	99%	

1 - no PH inspections done first four months of 2024; budgeted based on activity every month in 2025

2 - vacant inspector positions during 2024; budgeted fully staffed

Omaha Housing Authority

Asset Repositioning Effects

2025

Property	Projected Operating Subsidy Increase / (Decrease) over 2024 *	Projected Increase in Project-Based Voucher (PBV) Revenue	Projected Tenant Rent Decrease over 2024	Total Increase / (Decrease)	2025 Activity	Projected Transition Date
Southside	(630,815)	n/a	(591,580)	(1,222,395)	76 PH units offline beginning 5-1-2024, no vacancies being re-rented	in process
Spencer	(163,776)	n/a	n/a	(163,776)	Asset Repositioning Fee (ARF) ends 12-31-2025	complete
Timbercreek	(52,186)	n/a	n/a	(52,186)	Asset Repositioning Fee (ARF) ends 6-30-2025	complete
Chambers - sale of property **	(13,132)	n/a	(177,619)	(190,751)	sale of 32 PH units & 38 tax credit units	6/29/2025
NOAH - PBV conversion ***	(4,225)	130,259	n/a	126,035	19 units PBV; 5 to remain PH stock	4/1/2025
16 SCNE - Sale of units & PBV conversion ***	(92,668)	419,522	(54,497)	272,357	115 units PBV; 28 units sold	7/1/2025
18 SCNW - Sale of units & PBV conversion ***	(18,935)	146,385	(26,140)	101,310	66 units PBV; 10 units sold	sale of units by 7/1/2025; PBV conversion by 10/1/2025
17 SCSE - Sale of units ***	(33,944)	n/a	(47,898)	(81,842)	22 units sold	7/1/2025
Total Increase / (Decrease)	(1,009,681)	696,166	(897,734)	(1,211,248)		

* not reflective of any changes in projected OpSub for 2025 vs. 2024 via the 52723 submissions; only changes due to asset repositioning are reflected above

** Chambers will receive OpSub 75% year 1 / 50% year 2 / 25% year 3

*** PBV conversions & partial sales receive 75% of operating subsidy year 1; 50% year 2

RESOLUTION 2024-110
APPROVAL OF 2025 AGENCY BUDGETS

WHEREAS, the United States Department of Housing and Urban Development (HUD) requires submittal of fiscal year budgets for housing authorities;

WHEREAS, the Housing Authority of the City of Omaha (OHA) has prepared an agency-wide budget for the calendar year 2025 for submission to HUD;

WHEREAS, the 2025 agency budgets includes all OHA programs and departments including Public Housing, Section 8, Central Office Cost Center, Housing in Omaha, Inc., and affiliated partnerships; and

WHEREAS, OHA staff recommends that the OHA Board of Commissioners approve the agency-wide budgets for the calendar year 2025;

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves the agency-wide budget for the calendar year 2025.

David Levy, Chairman
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held December 19, 2024.

Joanie Balk, Secretary
Housing Authority of the City of Omaha

6.2.2. Resolution 2024-117 ACOP Chapter 7 Revisions

Memorandum



To: OHA Board of Commissioners

From: Susan Gilroy, Director of Compliance

Date: December 12, 2024

Re: Revision to ACOP (Admissions and Continued Occupancy Policies)

RECOMMENDATION

Staff of the Housing Authority of the City of Omaha (OHA) recommends that the Board of Commissioners approve revisions of OHA's Admissions and Continued Occupancy Policy (ACOP) Chapter 7 for the public housing program.

BACKGROUND

The ACOP is reviewed and updated annually. The ACOP was last updated in June 2023. OHA uses an ACOP policy template purchased from Nan McKay & Associates, which is considered an industry standard and reflects best practices.

As noted in red, ACOP Chapter 7 has been brought current with all recent HUD requirements and guidance in only the areas that staff will apply prior to HOTMA full implementation:

- Family Consent to Release of Information [24 CFR 960.259; CFR 5.230; and Notice PIH 2023-27]
- Verification Hierarchy [Notice PIH 2023-27]
- Social Security Numbers [24 CFR 5.216 and Notice PIH 2023-27]
- Zero Income Reviews [Notice PIH 2023-27]

Additional revisions will be made in upcoming board meetings to incorporate the remaining HOTMA provisions and policy updates in the rest of the ACOP chapters.

SUMMARY

The Housing Authority of the City of Omaha (hereinafter "OHA") Staff recommends that the Board of Commissioners approve the revisions to the Public Housing ACOP (Admissions and Continued Occupancy Policies).

SPONSORS: Susan Gilroy, Director of Compliance

RECOMMENDED BY: Joanie Poore, CEO

Chapter 7

VERIFICATION

[24 CFR 960.259, 24 CFR 5.230, Notice PIH 2023-27]

INTRODUCTION

The areas marked in red in this chapter will be effective January 1, 2025, prior to the full implementation of HOTMA.

The PHA must verify all information that is used to establish the family's eligibility and level of assistance and is required to obtain written authorization from the family in order to collect the information. Applicants and program participants must cooperate with the verification process as a condition of receiving assistance. The PHA must not pass on the cost of verification to the family.

The PHA must follow the verification guidance provided by HUD in Notice PIH 2023-27 and any subsequent guidance issued by HUD. This chapter summarizes those requirements and provides supplementary PHA policies.

Part I describes the general verification process. Part II provides more detailed requirements related to family information. Part III provides information on income and assets, and Part IV covers mandatory deductions.

Verification policies, rules and procedures will be modified as needed to accommodate persons with disabilities. All information obtained through the verification process will be handled in accordance with the records management policies established by the PHA.

PART I: GENERAL VERIFICATION REQUIREMENTS

7-I.A. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 960.259; 24 CFR 5.230; and Notice PIH 2023-27]

Consent Forms

The family must supply any information that the PHA or HUD determines is necessary to the administration of the program and must consent to PHA verification of that information [24 CFR 960.259(a)(1)]. All adult family members must sign consent forms as needed to collect information relevant to the family's eligibility and level of assistance. While PHAs must use form HUD-9886, this form does not release all the information necessary to the administration of the program. The PHA must also develop its own release forms to cover all other necessary information.

Form HUD-9886 [24 CFR 5.230(b)(1), (b)(2), (c)(4), and (c)(5); Notice PIH 2023-27]

All adult applicants and tenants must sign form HUD-9886, Authorization for Release of Information. All adult family members (and the head and spouse/cohead regardless of age) are required to sign the Form HUD-9886 at admission. Participants, prior to January 1, 2024, signed and submitted Form HUD-9886 at each annual reexamination. HOTMA eliminated this requirement and instead required that the Form HUD-9886a be signed only once. On or after January 1, 2024 (regardless of the PHA's HOTMA compliance date), current program participants must sign and submit a new Form HUD-9886a at their next interim or annual reexamination. This form will only be signed once. Another Form HUD-9886a will not be submitted to the PHA except under the following circumstances:

- When any person 18 years or older becomes a member of the family;
- When a current member of the family turns 18; or
- As required by HUD or the PHA in administrative instructions.

The PHA has the discretion to establish policies around when family members must sign consent forms when they turn 18. PHAs must establish these policies stating when family members will be required to sign consent forms at intervals other than at reexamination.

OHA Policy

Family members turning 18 years of age between annual recertifications will be notified in writing that they are required to sign the required Consent to the Release of Information Form HUD-9886a at the family's next annual or interim reexamination, whichever is earlier.

The purpose of form HUD-9886 is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form. HUD and the PHA may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members. Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA).

The PHA may obtain any financial record from any financial institution, as the terms financial record and financial institution are defined in the Right to Financial Privacy Act (12 U.S.C. 3401), whenever the PHA determines the record is needed to determine an applicant's or participant's eligibility for assistance or level of benefits [24 CFR 5.230(c)(4)].

The executed form will remain effective until the family is denied assistance, assistance is terminated, or the family provides written notification to the PHA to revoke consent.

Penalties for Failing to Consent [24 CFR 5.232]

If any family member who is required to sign a consent form fails to do so, the PHA must deny admission to applicants and terminate the lease of tenants [24 CFR 5.232(a)]. The family may request a hearing in accordance with the PHA's grievance procedures.

However, this does not apply if the applicant, participant, or any member of their family, revokes their consent with respect to the ability of the PHA to access financial records from financial institutions, unless the PHA establishes a policy that revocation of consent to access financial records will result in denial or termination of assistance or admission [24 CFR 5.232(c)]. PHAs may not process interim or annual reexaminations of income without the family's executed consent forms.

OHA Policy

OHA has established a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance in accordance with OHA policy.

In order for a family to revoke their consent, the family must provide written notice to OHA.

Within 10 business days of the date the family provides written notice, OHA will send the family a notice acknowledging receipt of the request and explaining that revocation of consent will result in denial or termination of assistance, as applicable. At the same time, OHA will notify the local HUD office.

7-I.B. USE OF OTHER PROGRAMS' INCOME DETERMINATIONS [24 CFR 5.609(c)(3) and Notice PIH 2023-27]

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. PHAs are not required to accept or use determinations of income from other federal means-tested forms of assistance. If the PHA adopts a policy to accept this type of verification, the PHA must establish 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 Credit (LIHTC) program (26 U.S.C. 42);
- Special Supplemental Nutrition Program for Woman, 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 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 child-care expenses deducted from a family's annual income, except for when a family is approved for a child-care 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.

PHA Policy

When available and applicable, the PHA will accept other programs' Safe Harbor determinations of income at annual reexamination to determine the family's total annual income. The PHA will still require third-party verification of all deductions such as the health and medical care expense or child care expense deductions. Further, if the family is eligible for and claims the disability assistance expense or child care expense deductions, where applicable, the PHA will obtain third-party verification of the amount of employment income of the individual(s) enabled to work in order to cap the respective expenses as required.

Prior to using any Safe Harbor determination from another program, the PHA will ask the family if they agree with the income amounts listed. If the family disputes the income amounts on the Safe Harbor determination, the PHA will obtain third-party verification of all sources of income and assets (as applicable).

The PHA will not accept other programs' determinations of income for any new admission or interim reexamination.

With the exception of income determinations made under the Low-Income Housing Tax Credit (LIHTC) program, the PHA will accept Safe Harbor determinations from any of the programs listed above.

In order to be acceptable, the income determination must:

- Be dated within 12 months of the dates listed above;

- State the family size;

- Be for the entire family (i.e., the family members listed in the documentation 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.

The determination need not list each source of income individually. If the PHA does not receive any acceptable income determination documentation or is unable to obtain documentation, then the PHA will revert to third-party verification of income for the family.

When families present multiple verifications from the same or different acceptable Safe Harbor programs, the PHA will use the most recent income determination, unless the family presents acceptable evidence that the PHA should consider an alternative verification from a different Safe Harbor source.

When the PHA uses a Safe Harbor income determination from another program, and the family's income subsequently changes, the family is required to report the change to the PHA. Depending on when the change occurred, the change may or may not impact the PHA's calculation of the family's total annual income. Changes that occur between the time the PHA receives the Safe Harbor documentation and the effective date of the family's annual reexam will not be considered. If the family has a change in income that occurs after the annual reexam effective date, the PHA will conduct an interim reexam if the change meets the requirements for performing an interim reexamination as outlined in Chapter 9. In this case, the PHA will use third-party verification to verify the change.

7-I.C. STREAMLINED INCOME DETERMINATIONS [24 CFR 960.257(c); Notice PIH 2023-27]

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

When the PHA does not use a Safe Harbor income determination from a federal assistance program to determine the family's annual income as outlined above, then PHA will use a streamlined income determinations where applicable.

If 90 percent or more of a family's unadjusted income is from fixed income sources:

The PHA will streamline the annual reexamination process by applying the verified inflationary adjustment factor to fixed-income sources.

The family will be required to sign a self-certification stating that 90 percent or more of their unadjusted income is fixed income and that their sources of fixed income have not changed from the previous year.

The PHA will document in the file how the determination that a source of income was fixed was made.

Third-party verification of non-fixed income will be obtained annually regardless of the percentage of family income received from fixed sources.

If the family's sources of fixed income have changed from the previous year, the PHA will obtain third-party verification of any new sources of fixed income.

When less than 90 percent of a family's unadjusted income consists of fixed income:

The PHA will apply a COLA to each of the family's sources of fixed income.

All other income will be verified using third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy.

In the following circumstances, regardless of the percentage of income received from fixed sources, the PHA will obtain third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy:

Of all assets when net family assets exceed \$50,000;

Of all deductions and allowances from annual income;

If a family member with a fixed source of income is added;

If verification of the COLA or rate of interest is not available;

During the intake process and at least once every three years thereafter.

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 \$50,000 (as adjusted annually);
- 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 "tenant-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, 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 ACOP. 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 VERIFICATION: UP-FRONT INCOME VERIFICATION (UIV)

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 the opportunity to contest any adverse findings through the PHA's informal review/hearing processes.

Upfront Income Verification Using HUD's Enterprise Income Verification (EIV) System

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 and IVT Reports

PHAs are required to obtain an EIV Income and IVT report for each family any time the PHA conducts an annual reexamination. However, PHAs are not required to use the EIV Income and IVT reports:

- At annual reexamination if the PHA used Safe Harbor verification from another means-test federal assistance program to determine the family's income; or
- During any interim reexaminations.

The EIV Income and IVT Reports are also not available for program applicants at admission.

When required to use the EIV Income Report, in order for the report to be considered current, the PHA must pull the report within 120 days of the effective date of the annual reexamination.

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.

OHA Policy

Except for when Safe Harbor verification from another means-tested federal assistance program is used to determine the family's annual income, OHA will obtain EIV Income and IVT reports for all annual reexaminations for all families on a monthly basis. Reports will be generated as part of the regular reexamination process. OHA will ensure that all EIV Income Reports are pulled within 120 days of the effective date of the annual reexamination.

Income and IVT 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 and IVT reports will be retained in resident files with the applicable annual documents or interim reexamination documents (if applicable) for the duration of tenancy.

When OHA 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 15, Program Integrity.

New Hires Report [Notice PIH 2023-27]

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

In accordance with the PHA policies in Chapter 9, the PHA does not process interim reexaminations for families who have increases in earned income. Except for instances in which the PHA uses Safe Harbor income determinations to determine a family's annual income, the PHA will only review the New Hires Report at annual reexamination.

No Income Reported by HHS or SSA Report

This report is a tool for PHAs to identify participants who passed the SSA identity test, but no income information was reported by either HHS or SSA records. This scenario does not mean that the tenant does not have any income. PHAs obtain written, third-party verification of any income reported by the tenant. The PHA must identify in its policies and procedures when this report will be pulled [Notice PIH 2023-27].

PHA Policy

The PHA will generate the No Income Reported by HHS or SSA Report once it is available quarterly and will retain the report.

The PHA will re-verify the status of tenants 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 in order 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 15, Program Integrity.

EIV Identity Verification Report

The EIV system verifies resident identities against Social Security Administration (SSA) records. These records are compared to HUD data for a match on social security numbers, 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 resident fails, a message will be displayed within the EIV system, and no income information will be displayed.

OHA Policy

OHA will identify residents whose identity verification has failed by reviewing EIV's *Identity Verification Report* on a monthly basis.

OHA will attempt to resolve discrepancies by obtaining appropriate documentation from the tenant. When OHA determines that discrepancies exist as a result of OHA 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]

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 quarterly.

OHA Policy

OHA will review the Deceased Tenants Report on a monthly basis.

When the Deceased Tenants Report identifies an individual as being deceased, PHAs must immediately contact the head of household or emergency contact person (if the head of household is deceased and there is no other adult household member) to confirm the death of the listed household member. The PHA must conduct a home visit to determine if anyone is residing in the unit.

PHAs are required to list the move-out date for the family as of the date on which the family or designee of the deceased tenant's estate returned the keys and signed a vacate notice; the date the public housing lease was terminated; or the date the PHA legally regained possession of the unit, whichever occurs first.

When the only remaining household member is the live-in aide, the live-in aide is not entitled or eligible for 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.

Other EIV Reports [Notice PIH 2023-27]

The PHA is required to review the Multiple Subsidy Report at least quarterly and the Failed EIV Pre-Screening and Failed Verification (Failed SSA Identity Test) reports at least monthly.

Upfront Income Verification Using Non-HUD Systems

HUD encourages PHAs to utilize other upfront verification sources such as the Work Number and web-based state benefits systems.

OHA Policy

OHA will inform all applicants and residents of its use of the following UIV resources, but not limited to:

Thomas and Co., Veri-Safe Jobs, CCC Verify, Experian Verify, Confirmation, Bank VOD, Nebraska Dept of Health and Human Services iCHARTS (Child Support), Nebraska Dept of Labor NETWORKS (Unemployment)

7-I.F. LEVEL 4 VERIFICATION [Notice PIH 2023-27]

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.

OHA Policy

At annual reexamination, if OHA 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, OHA will use EIV + self-certification as verification of employment income, provided the family agrees with the amounts listed in EIV.

OHA will use an average of the last two quarters of income listed in EIV to determine income from employment as long as they are employed for the entire quarter. OHA will provide the family with information in EIV. The family will be required to sign a self-certification stating that the amount listed in EIV is accurate and representative of current income. If the family disagrees with the amount in EIV, the amount is not reflective of current income, or if less than two quarters are available in EIV, OHA will use written third-party verification from the source as outlined below.

OHA 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.

Written Third-Party Verification from the Source

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. Documents may be supplied by the family or received from a third-party source.

Examples of acceptable tenant-provided documents include, but are not limited to pay stubs, payroll summary reports, employer notice or letters of hire and termination, SSA benefit verification letters, bank statements, child support payment stubs, welfare benefit letters and/or printouts, and unemployment monetary benefit notices. 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.) are an acceptable form of written, third-party verification.

The PHA is required to obtain, at minimum, two current and consecutive pay stubs when calculating income using third-party verification from the source. For new income sources or when two pay stubs are not available, the PHA should determine income based on the information from a traditional written, third-party verification form or the best available information.

When the family disputes EIV-reported employment income, the PHA uses written third-party verification.

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.

OHA Policy

In general, OHA will use third-party verification from the source in the following circumstances:

- At annual reexamination when EIV + self-certification is not used;

- For all new admissions; and

- For all interim reexaminations.

OHA will not use this method if OHA is able to use an income determination from a means-tested federal assistance program or if OHA uses EIV + self-certification as outlined above.

In general, third-party documents provided by the family or the source must be dated within 120 days of the date received by OHA. However, for fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation.

OHA may reject documentation provided by the family if the document is not an original, if the document appears to be forged, or if the document is altered, mutilated, or illegible. If OHA determines that third-party documents provided by the family are not acceptable, OHA will explain the reason to the family and request additional documentation from the family or will use a lower form of verification such as a written third-party verification form.

When verification of assets held by a banking or financial institution is required, OHA will obtain one statement that reflects the current balance of the account.

When pay stubs are used, OHA will require the family to provide the two most current, consecutive pay stubs as long as employed for the entire pay period. At the PHA's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income, fluctuating schedule, etc.), OHA may request additional paystubs or a payroll record.

7-I.G. LEVEL 3 VERIFICATION: WRITTEN, THIRD-PARTY FORM **[Notice PIH 2023-27]**

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.

OHA Policy

Typically, OHA 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, OHA 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]

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.

OHA Policy

In general, OHA 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, OHA will accept self-certification from the family without attempting to obtain oral third-party verification.

However, if OHA chooses to obtain oral third-party verification, OHA 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]

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.

OHA Policy

If the family cannot provide original documents, OHA 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. The Work Number has been determined not to be cost effective at OHA.

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

Third-party verification is not required when legal documents are the primary source, such as a birth certificate or other legal documentation of birth.

7-I.I. LEVEL 1: NON-THIRD-PARTY VERIFICATION TECHNIQUE: SELF-CERTIFICATION [Notice PIH 2023-27]

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 total \$50,000 or less 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 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 annual recertifications for fixed sources of income.

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.

OHA Policy

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 OHA.

OHA may require a family to certify that a family member does not receive a particular type of income or benefit.

The self-certification must be made in a format acceptable to OHA 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)."

PART II: VERIFYING FAMILY INFORMATION

7-II.A. VERIFICATION OF LEGAL IDENTITY

PHA Policy

The PHA will require families to furnish verification of legal identity for each household member.

Verification of Legal Identity for Adults	Verification of Legal Identity for Children
Certificate of birth, naturalization papers Church issued baptismal certificate Current, valid driver's license or Department of Motor Vehicle identification card U.S. military discharge (DD 214) Current U.S. passport Current government employer identification card with picture	Certificate of birth Adoption papers Custody agreement Health and Human Services ID Certified school records

If a document submitted by a family is illegible for any reason or otherwise questionable, more than one of these documents may be required.

If none of these documents can be provided and at the PHA's discretion, a third party who knows the person may attest to the person's identity. The certification must be provided in a format acceptable to the PHA and be signed by the family member whose information or status is being verified.

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 tenant or a member of a tenant family.

7-II.B. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and Notice PIH 2023-27]

The family must provide documentation of a valid Social Security number (SSN) for each member of the household, with the exception of individuals who do not contend eligible immigration status. Exemptions also include, existing residents who were at least 62 years of age as of January 31, 2010, and had not previously disclosed an SSN.

The PHA must accept the following documentation as acceptable evidence of the social security number:

- An original SSN card issued by the Social Security Administration (SSA)
- An original SSA-issued document, which contains the name and SSN of the individual
- An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual

While PHAs must attempt to gather third-party verification of SSNs prior to admission as listed above, PHAs also have the option of accepting a self-certification and a third-party document (such as a bank statement, utility or cell phone bill, or benefit letter) with the applicant's name printed on it to satisfy the SSN disclosure requirement if the PHA has exhausted all other attempts to obtain the required documentation. If verifying an individual's SSN using this method, the PHA must document why the other SSN documentation was not available.

If the tenant's SSN becomes verified in EIV, then no further verification is required. If the tenant's SSN fails the SSA identity match, then the PHA must obtain a valid SSN card issued by the SSA or an original document issued by a federal or state government agency that contains the name of the individual and the SSN of the individual, along with other identifying information of the individual. The tenant's assistance must be terminated if they fail to provide the required documentation.

OHA Policy

OHA will verify an individual's SSN in the situations described above using the method described above as a last resort when no other forms of verification of the individual's SSN are available.

The PHA may only reject documentation of an SSN provided by an applicant or resident if the document is not an original document, if the original document has been altered, mutilated, is illegible, or if the document appears to be forged.

OHA Policy

OHA will explain to the applicant or resident the reasons the document is not acceptable and request that the individual obtain and submit acceptable documentation of the SSN to OHA within 90 days.

If an applicant family includes a child under 6 years of age who joined the household within the 6 months prior to the date of program admission, an otherwise eligible family may be admitted and must provide documentation of the child's SSN within 90 days. A 90-day extension will be granted if the PHA determines that the resident's failure to comply was due to unforeseen circumstances and was outside of the resident's control.

OHA Policy

OHA will grant one additional 90-day extension if needed for reasons beyond the applicant's control, such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.

When a resident requests to add a new household member who is at least 6 years of age, or who is under the age of 6 and has an SSN, the resident must provide the complete and accurate SSN assigned to each new member at the time of reexamination or recertification, in addition to the documentation required to verify it. The PHA may not add the new household member until such documentation is provided.

When a resident requests to add a new household member who is under the age of 6 and has not been assigned an SSN, the resident must provide the SSN assigned to each new child and the required documentation within 90 calendar days of the child being added to the household. A 90-day extension will be granted if the PHA determines that the resident's failure to comply was due to unforeseen circumstances and was outside of the resident's control. During the period the PHA is awaiting documentation of the SSN, the child will be counted as part of the assisted household.

OHA Policy

OHA will grant one additional 90-day extension if needed for reasons beyond the resident's control such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.

Social security numbers must be verified only once during continuously assisted occupancy.

OHA Policy

OHA will verify each disclosed SSN by:

Obtaining documentation from applicants and residents that is acceptable as evidence of social security numbers

Making a copy of the original documentation submitted, returning it to the individual, and retaining a copy in the file folder

Once the individual's verification status is classified as "verified," the PHA may, at its discretion, remove and destroy copies of documentation accepted as evidence of social security numbers. The retention of the EIV Summary Report or Income Report is adequate documentation of an individual's SSN.

OHA Policy

Once an individual's status is classified as "verified" in HUD's EIV system, OHA will not remove and destroy copies of documentation accepted as evidence of social security numbers.

7-II.C. DOCUMENTATION OF AGE

A birth certificate or other official record of birth is the preferred form of age verification for all family members. For elderly family members an original document that provides evidence of the receipt of social security retirement benefits is acceptable.

PHA Policy

If an official record of birth or evidence of social security retirement benefits cannot be provided, the PHA will require the family to submit other documents that support the reported age of the family member (e.g., school records, driver's license if birth year is recorded) and to provide a self-certification.

Age must be verified only once during continuously assisted occupancy.

7-II.D. FAMILY RELATIONSHIPS

Applicants and tenants are required to identify the relationship of each household member to the head of household. Definitions of the primary household relationships are provided in the Eligibility chapter.

PHA Policy

Family relationships are verified only to the extent necessary to determine a family's eligibility and level of assistance. Certification by the head of household normally is sufficient verification of family relationships.

Marriage

PHA Policy

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a marital relationship, the PHA will require the family to document the marriage with a marriage certificate or other documentation to verify that the couple is married.

In the case of a common law marriage, the couple must demonstrate that they hold themselves to be married (e.g., by telling the community they are married, calling each other husband and wife, using the same last name, filing joint income tax returns).

Separation or Divorce

PHA Policy

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a divorce or separation, the PHA will require the family to provide documentation of the divorce or separation with a certified copy of a divorce decree, signed by a court officer; a copy of a court-ordered maintenance or other court record; or other documentation that shows a couple is divorced or separated.

If no court document is available, documentation from a community-based agency will be accepted.

Absence of Adult Member

PHA Policy

If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation of another address at which the person resides such as a lease or utility bill), if the PHA so requests.

Foster Children and Foster Adults

PHA Policy

Third-party verification from the state or local government agency responsible for the placement of the individual with the family is required.

7-II.E. VERIFICATION OF STUDENT STATUS

PHA Policy

The PHA requires families to provide information about the student status of all students who are 18 years of age or older. This information will be verified only if:

The family claims full-time student status for an adult other than the head, spouse, or cohead, or

The family claims a child care deduction to enable a family member to further their education.

7-II.F. DOCUMENTATION OF DISABILITY

The PHA must verify the existence of a disability in order to allow certain income disallowances and deductions from income. The PHA is not permitted to inquire about the nature or extent of a person's disability [24 CFR 100.202(c)]. The PHA may not inquire about a person's diagnosis or details of treatment for a disability or medical condition. If the PHA receives a verification document that provides such information, the PHA will not place this information in the tenant file. Under no circumstances will the PHA request a resident's medical record(s). For more information on health care privacy laws, see the Department of Health and Human Services' Web site at www.os.dhhs.gov.

The PHA may make the following inquiries, provided it makes them of all applicants, whether or not they are persons with disabilities [VG, p. 24]:

- Inquiry into an applicant's ability to meet the requirements of ownership or tenancy
- Inquiry to determine whether an applicant is qualified for a dwelling available only to persons with disabilities or to persons with a particular type of disability
- Inquiry to determine whether an applicant for a dwelling is qualified for a priority available to persons with disabilities or to persons with a particular type of disability
- Inquiry about whether an applicant for a dwelling is a current illegal abuser or addict of a controlled substance
- Inquiry about whether an applicant has been convicted of the illegal manufacture or distribution of a controlled substance

Family Members Receiving SSA Disability Benefits

Verification of receipt of disability benefits from the Social Security Administration (SSA) is sufficient for verification of disability for the purpose of qualification for waiting list preferences or certain income disallowances and deductions [VG, p. 23].

PHA Policy

For family members claiming disability who receive disability payments from the SSA, the PHA will attempt to obtain information about disability benefits through HUD's Enterprise Income Verification (EIV) system. If documentation is not available through HUD's EIV system, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member claiming disability status. If a family member is unable to provide the document, the PHA will ask the family to obtain a benefit verification letter either by calling SSA at 1-800-772-1213 or by requesting one from www.ssa.gov. Once the family receives the benefit verification letter, they will be required to provide the letter to the PHA.

Family Members Not Receiving SSA Disability Benefits

Receipt of veteran's disability benefits, worker's compensation, or other non-SSA benefits based on the individual's claimed disability are not sufficient verification that the individual meets HUD's definition of disability in 24 CFR 5.403, necessary to qualify for waiting list preferences or certain income disallowances and deductions.

PHA Policy

For family members claiming disability who do not receive SSI or other disability payments from the SSA, a knowledgeable professional must provide third-party verification that the family member meets the HUD definition of disability. See the Eligibility chapter for the HUD definition of disability. The knowledgeable professional will verify whether the family member does or does not meet the HUD definition.

7-II.G. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5.508]

Overview

Housing assistance is not available to persons who are not citizens, nationals, or eligible immigrants. Prorated assistance is provided for "mixed families" containing both eligible and ineligible persons. See the Eligibility chapter for detailed discussion of eligibility requirements. This chapter (7) discusses HUD and PHA verification requirements related to citizenship status.

The family must provide a certification that identifies each family member as a U.S. citizen, a U.S. national, an eligible noncitizen or an ineligible noncitizen and submit the documents discussed below for each family member. Once eligibility to receive assistance has been verified for an individual it need not be collected or verified again during continuously-assisted occupancy [24 CFR 5.508(g)(5)]

U.S. Citizens and Nationals

HUD requires a declaration for each family member who claims to be a U.S. citizen or national. The declaration must be signed personally by any family member 18 or older and by a guardian for minors.

The PHA may request verification of the declaration by requiring presentation of a birth certificate, United States passport or other appropriate documentation.

PHA Policy

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

Documents Required

All family members claiming eligible immigration status must declare their status in the same manner as U.S. citizens and nationals.

The documentation required for eligible noncitizens varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, age, and the date on which the family began receiving HUD-funded assistance. Exhibit 7-1 at the end of this chapter summarizes documents family members must provide.

PHA Verification [HCV GB, pp 5-3 and 5-7]

For family members age 62 or older who claim to be eligible immigrants, proof of age is required in the manner described in 7-II.C. of this ACOP. No further verification of eligible immigration status is required.

For family members under the age of 62 who claim to be eligible immigrants, the PHA must verify immigration status with the U.S. Citizenship and Immigration Services (USCIS).

The PHA will follow all USCIS protocols for verification of eligible immigration status.

7-II.H. VERIFICATION OF PREFERENCE STATUS

The PHA must verify any preferences claimed by an applicant that determined their placement on the waiting list.

PHA Policy

The PHA offers a preference for working families, described in Section 4-III.B.

The PHA may verify that the family qualifies for the working family preference based on the family's submission of the working member's most recent paycheck stub indicating that the working member works at least 20 hours per week. The paycheck stub must have been issued to the working member within the last thirty days.

The PHA may also seek third party verification from the employer of the head, spouse, cohead or sole member of a family requesting a preference as a working family.

The PHA also offers a preference for victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking as described in Section 4-III.B. To verify that applicants qualify for the preference, the PHA will follow documentation requirements outlined in Section 16-VII.D.

PART III: VERIFYING INCOME AND ASSETS

Chapter 6 of this ACOP describes in detail the types of income that are included and excluded and how assets and income from assets are handled. Any income reported by the family must be verified. This part provides PHA policies that supplement the general verification procedures specified in Part I of this chapter.

PHA Policy

The following policies do not apply when the PHA uses a safe harbor income determination from a means-tested federal assistance program.

7-III.A. EARNED INCOME

Tips

PHA Policy

Unless tip income is included in a family member's W-2 by the employer or in UIV verification sources, persons who work in industries where tips are standard will be required to sign a certified estimate of tips received for the prior year or tips anticipated to be received in the coming year.

Wages

PHA Policy

When the PHA requires third-party verification of wages, for wages other than tips, the family must provide originals of the two most current, consecutive pay stubs.

7-III.B. BUSINESS AND SELF EMPLOYMENT INCOME

The PHA must obtain written, third-party verification when the income type is not available in EIV. This includes income from self-employment.

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.).

If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.

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 Schedule C of the individual's tax return and the corresponding IRS Form 1099 or 1099k.

The PHA will provide a format for any person who is unable to provide such a statement to record income and expenses for the coming year. The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations. At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.

If a family member has been self-employed less than three (3) months, the PHA will accept the family member's certified estimate of income and schedule an interim reexamination in three (3) months. If the family member has been self-employed for three (3) to twelve (12) months, the PHA will require the family to provide documentation of income and expenses for this period and use that information to project income.

7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS

For policies governing streamlined income determinations for fixed sources of income, please see Chapter 9.

Social Security/SSI Benefits

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 last 120 calendar days) 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 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 last 120 calendar days) 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.

7-III.D. ALIMONY OR 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 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

The methods the PHA will use to verify alimony and child support payments differ depending on whether the family declares that it receives regular payments.

If the family declares that it *receives regular payments*, verification will be obtained in the following order of priority:

Copies of the receipts and/or payment stubs for the 12 months 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]

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

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]

At admission and reexam, for families with net assets totaling \$50,000 or less (adjusted annually), the PHA may, but is not required to, accept the family's self-certification that the family's assets do not exceed \$50,000 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 excluded from the calculation of net family assets (because the combined value of non-necessary personal property does not exceed \$50,000), 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 value over \$50,000, the PHA may not rely on the family's self-certification. Third-party verification of assets is required when net family assets exceed \$50,000, adjusted annually by HUD.

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.

PHA Policy

For families with net assets totaling \$50,000 or less, the PHA will accept the family's self-certification of the value of family assets and anticipated asset income. The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration. The PHA reserves the right to require additional verification in situations where the accuracy of the declaration is in question. Any income the family expects to receive from assets will be included in the family's annual income. The family will be required to provide third-party verification of net family assets every three years.

When verification is required, 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)]

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 and 13. At admission and reexam, the PHA may accept a self-certification from the family that the family does not have any present ownership in any real property that is suitable for occupancy. If the family declares they have present ownership in real property, the PHA must obtain third-party verification.

PHA Policy

Both at admission and reexam, the PHA will accept self-certification from the family that the family does not have any present ownership in any real property. The certification will state that the family does not have any present ownership interest in any real property and 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 a 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, or stalking, the PHA will comply with confidentiality requirements under 24 CFR 5.2007 and will accept a self-certification.

7-III.G. ASSETS DISPOSED OF FOR LESS THAN FAIR MARKET VALUE

The family must certify whether any assets have been disposed of for less than fair market value in the preceding two years. 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]. The PHA needs to verify only those certifications that warrant documentation [HCV GB, p. 5-28].

PHA Policy

The PHA will accept a self-certification from a family as verification of assets disposed of for less than fair market value.

The PHA will verify the value of assets disposed of only if:

The PHA does not already have a reasonable estimation of its value from previously collected information, or

The amount reported by the family in the certification appears obviously in error.

Example 1: An elderly resident reported a \$10,000 certificate of deposit at the last annual reexamination and the PHA verified this amount. Now the person reports that she has given this \$10,000 to her son. The PHA has a reasonable estimate of the value of the asset; therefore, reverification of the value of the asset is not necessary.

Example 2: A family member has disposed of its 1/4 share of real property located in a desirable area and has valued her share at approximately \$5,000. Based upon market conditions, this declaration does not seem realistic. Therefore, the PHA will verify the value of this asset.

7-III.H. NET INCOME FROM RENTAL PROPERTY

PHA Policy

The family must provide:

A current executed lease for the property that shows the rental amount or certification from the current tenant

A self-certification from the family members engaged in the rental of property providing an estimate of expenses for the coming year and the most recent IRS Form 1040 with Schedule E (Rental Income).

If schedule E was not prepared, the PHA will require the family members involved in the rental of property to provide a self-certification of income and expenses for the previous year and may request documentation to support the statement including: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense.

7-III.I. FEDERAL TAX REFUNDS OR REFUNDABLE TAX CREDITS

[Notice PIH 2023-27]

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 equal to or below \$50,000 (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 \$50,000.

7-III.J. RETIREMENT ACCOUNTS

PHA Policy

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. INCOME FROM EXCLUDED SOURCES [Notice PIH 2023-27]

A detailed discussion of excluded income is provided in Chapter 6, Part I.

HUD guidance on verification of excluded income draws a distinction between income which is fully excluded and income which is only partially excluded.

For fully excluded income, the PHA is **not** required to verify the income using third-party verification, document why third-party verification is not available, or report the income on the 50058. *Fully excluded income* is defined as income where the entire amount qualifies to be excluded from the annual income determination in accordance with 24 CFR 5.609(b) and any *Federal Register* notice on mandatory exclusions issued by HUD (for example, food stamps, earned income of a minor, or foster care funds).

PHAs may accept a family's signed application or reexamination form as self-certification of fully excluded income. They do not have to require additional documentation. However, if there is any doubt that a source of income qualifies for full exclusion, PHAs have the option of requiring additional verification.

For partially excluded income, the PHA **is** required to follow the verification hierarchy and all applicable regulations, and to report the income on the 50058. Partially excluded income is defined as income where only a certain portion of what is reported by the family qualifies to be excluded and the remainder is included in annual income (for example, the income of an adult full-time student).

PHA Policy

The PHA will accept the family's self-certification as verification of fully excluded income. The PHA may request additional documentation if necessary to document the income source.

The PHA will verify the source and amount of partially excluded income as described in Part 1 of this chapter.

7-III.L. ZERO INCOME REVIEWS [Notice PIH 2023-27]

A *zero income review* is an assessment, sometimes periodic, performed by the PHA of the income of a family who claims that they do not receive income from any source, including from assets. During such reviews, it is common for PHAs to request that families complete and sign a worksheet explaining how they pay for the household's expenses. HUD does not require PHAs to conduct periodic zero income reviews. 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 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.

OHA Policy

OHA will check UIV sources and/or may request information from third-party sources to verify that certain forms of income such as unemployment benefits, TANF, SS, SSI, earned income, child support, etc. are not being received by families claiming to have zero annual income.

OHA will 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, OHA will verify the income in accordance with the policies in this chapter prior to including the income in the family's annual income.

OHA will only conduct interims in accordance with OHA policy in Chapter 9.

7-III.M. STUDENT FINANCIAL ASSISTANCE [24 CFR 5.609(b)(9)]

The regulations under HOTMA distinguish between two categories of student financial assistance paid to both full-time and part-time students. Any assistance to students under section 479B of the Higher Education Act of 1965 (Title IV of the HEA) must be excluded from the family's annual income [24 CFR 5.609(b)(9)(i)]. Any other grant-in-aid, scholarship, or other assistance amounts an individual receives for the actual covered costs charged by the institution of higher education not otherwise excluded by the federally mandated income exclusions are excluded [24 CFR 5.609(b)(9)(ii)].

PHA Policy

The PHA will request written third-party verification of both the source and the amount of student financial assistance. Family-provided documents from the educational institution attended by the student will be requested, as well as documents generated by any other person or entity providing such assistance, as reported by the student.

In addition, unless the student's only source of assistance is assistance under Title IV of the HEA, the PHA will request written verification of the cost of the student's tuition, books, supplies, room and board, and other required fees and charges to the student from the educational institution.

If the PHA is unable to obtain third-party written verification of the requested information, the PHA will pursue other forms of verification following the verification hierarchy in section 7-I.B.

PART IV: VERIFYING MANDATORY DEDUCTIONS

7-IV.A. DEPENDENT AND ELDERLY/DISABLED HOUSEHOLD DEDUCTIONS

The dependent and elderly/disabled family deductions require only that the PHA verify that the family members identified as dependents or elderly/disabled persons meet the statutory definitions. No further verifications are required.

Dependent Deduction

See Chapter 6 for a full discussion of this deduction. The PHA will verify that:

- Any person under the age of 18 for whom the dependent deduction is claimed is not the head, spouse or cohead of the family and is not a foster child
- Any person age 18 or older for whom the dependent deduction is claimed is not a foster adult or live-in aide, and is a person with a disability or a full time student

Elderly/Disabled Family Deduction

See the Eligibility chapter for a definition of elderly and disabled families and Chapter 6 for a discussion of the deduction. The PHA will verify that the head, spouse, or cohead is 62 years of age or older or a person with disabilities.

7-IV.B. HEALTH AND MEDICAL CARE EXPENSE DEDUCTION

Policies related to medical 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

Medical expenses will be verified through:

Written third-party documents provided by the family, such as pharmacy printouts or receipts.

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 medical expenses during the upcoming 12 months.

Written third-party verification forms if the family is unable to provide acceptable documentation.

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 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].

In addition, the PHA must verify that:

- The household is eligible for the deduction.
- The costs to be deducted are qualified health and medical care expenses.
- The expenses are not paid for or reimbursed by any other source.
- Costs incurred in past years are counted only once.

Eligible Household

The health and medical care expense deduction is permitted only for households in which the head, spouse, or cohead is at least 62 or a person with disabilities. The PHA will verify that the family meets the definition of an elderly or disabled family provided in the Eligibility chapter, and as described in Chapter 7 (7-IV.A) of this plan.

Qualified Expenses

To be eligible for the health and medical care expense deduction, the costs must qualify as medical expenses. See Chapter 6 for the PHA's policy on what counts as a medical expense.

Unreimbursed Expenses

To be eligible for the health and medical care expense deduction, the costs must not be reimbursed by another source.

PHA Policy

The family will be required to certify that the medical expenses are not paid or reimbursed to the family from any source. If expenses are verified through a third party, the third party must certify that the expenses are not paid or reimbursed from any other source.

Expenses Incurred in Past Years

PHA Policy

When anticipated costs are related to on-going payment of medical bills incurred in past years, the PHA will verify:

- The anticipated repayment schedule

- The amounts paid in the past, and

- Whether the amounts to be repaid have been deducted from the family's annual income in past years

7-IV.C. DISABILITY ASSISTANCE EXPENSES

Policies related to disability assistance expenses are found in 6-II.E. 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 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

Attendant Care

PHA Policy

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.

If third-party verification is not possible, written family certification as to costs anticipated to be incurred for 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 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

Expenses for auxiliary apparatus will be verified through:

Written third-party documents provided by the family, such as billing statements for purchase of auxiliary apparatus, or other evidence of monthly payments or total payments that will be due for the apparatus during the upcoming 12 months.

Third-party verification form signed by the provider, if family-provided documents are not available.

If third-party or document review is not possible, written family certification of estimated apparatus costs for the upcoming 12 months.

In addition, the PHA must verify that:

- The family member for whom the expense is incurred is a person with disabilities (as described in 7-II.F above).
- The expense permits a family member, or members, to work (as described in Chapter 6.).
- The expense is not reimbursed from another source (as described in Chapter 6.).

Family Member is a Person with Disabilities

To be eligible for the disability assistance expense deduction, the costs must be incurred for attendant care or auxiliary apparatus expense associated with a person with disabilities. The PHA will verify that the expense is incurred for a person with disabilities (See 7-II.F.).

Family Member(s) Permitted to Work

The PHA must verify that the expenses claimed actually enable a family member, or members, (including the person with disabilities) to work.

PHA Policy

The PHA will request third-party verification from a rehabilitation agency or knowledgeable medical professional indicating that the person with disabilities requires attendant care or an auxiliary apparatus to be employed, or that the attendant care or auxiliary apparatus enables another family member, or members, to work (See 6-II.E.). This documentation may be provided by the family.

If third-party verification has been attempted and is either unavailable or proves unsuccessful, the family must certify that the disability assistance expense frees a family member, or members (possibly including the family member receiving the assistance), to work.

Unreimbursed Expenses

To be eligible for the disability expenses deduction, the costs must not be reimbursed by another source.

PHA Policy

The family will be required to certify that attendant care or auxiliary apparatus expenses are not paid by or reimbursed to the family from any source.

7-IV.D. CHILD CARE EXPENSES

Policies related to child care expenses are found in Chapter 6. The amount of the deduction will be verified following the standard verification procedures described in Part I. In addition, the PHA must verify that:

- The child is eligible for care (12 or younger).
- The costs claimed are not reimbursed.
- The costs enable a family member to work, actively seek work, or further their education.
- The costs are for an allowable type of child care.
- The costs are reasonable.

Eligible Child

To be eligible for the child care deduction, the costs must be incurred for the care of a child under the age of 13. The PHA will verify that the child being cared for (including foster children) is under the age of 13 (See 7-II.C.).

Unreimbursed Expense

To be eligible for the child care deduction, the costs must not be reimbursed by another source.

PHA Policy

The family and the care provider will be required to certify that the child care expenses are not paid by or reimbursed to the family from any source.

Pursuing an Eligible Activity

The PHA must verify that the family member(s) that the family has identified as being enabled to seek work, pursue education, or be gainfully employed, are actually pursuing those activities.

PHA Policy

Information to be Gathered

The PHA will verify information about how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the time required for study (for students), the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.

Seeking Work

Whenever possible the PHA will use documentation from a state or local agency that monitors work-related requirements (e.g., welfare or unemployment). In such cases the PHA will request family-provided verification from the agency of the member's job seeking efforts to date and require the family to submit to the PHA any reports provided to the other agency.

In the event third-party verification is not available, the PHA will provide the family with a form on which the family member must record job search efforts. The PHA will review this information at each subsequent reexamination for which this deduction is claimed.

Furthering Education

The PHA will request third-party documentation to verify that the person permitted to further their education by the child care is enrolled and provide information about the timing of classes for which the person is registered. The documentation may be provided by the family.

Gainful Employment

The PHA will seek third-party verification of the work schedule of the person who is permitted to work by the child care. In cases in which two or more family members could be permitted to work, the work schedules for all relevant family members may be verified. The documentation may be provided by the family.

Allowable Type of Child Care

The type of care to be provided is determined by the family, but must fall within certain guidelines, as discussed in Chapter 6.

PHA Policy

The PHA will verify that the type of child care selected by the family is allowable, as described in Chapter 6.

The PHA will verify that the fees paid to the child care provider cover only child care costs (e.g., no housekeeping services or personal services) and are paid only for the care of an eligible child (e.g., prorate costs if some of the care is provided for ineligible family members).

The PHA will verify that the child care provider is not an assisted family member. Verification will be made through the head of household's declaration of family members who are expected to reside in the unit.

Reasonableness of Expenses

Only reasonable child care costs can be deducted.

PHA Policy

The actual costs the family incurs will be compared with the PHA's established standards of reasonableness for the type of care in the locality to ensure that the costs are reasonable.

If the family presents a justification for costs that exceed typical costs in the area, the PHA will request additional documentation, as required, to support a determination that the higher cost is appropriate.

**Exhibit 7-1: Summary of Documentation Requirements for Noncitizens
[HCV GB, pp. 5-9 and 5-10]**

- **All** noncitizens claiming eligible status must sign a declaration of eligible immigrant status on a form acceptable to the PHA.
- Except for persons 62 or older, all noncitizens must sign a verification consent form
- Additional documents are required based upon the person's status.

Elderly Noncitizens

- A person 62 years of age or older who claims eligible immigration status also must provide proof of age such as birth certificate, passport, or documents showing receipt of SS old-age benefits.

All other Noncitizens

- Noncitizens that claim eligible immigration status also must present the applicable USCIS document. Acceptable USCIS documents are listed below.

- Form I-551 Alien Registration Receipt Card (for permanent resident aliens)
- Form I-94 Arrival-Departure Record annotated with one of the following:
 - “Admitted as a Refugee Pursuant to Section 207”
 - “Section 208” or “Asylum”
 - “Section 243(h)” or “Deportation stayed by Attorney General”
 - “Paroled Pursuant to Section 221 (d)(5) of the USCIS”

- Form I-94 Arrival-Departure Record with no annotation accompanied by:
 - A final court decision granting asylum (but only if no appeal is taken);
 - A letter from a USCIS asylum officer granting asylum (if application is filed on or after 10/1/90) or from a USCIS district director granting asylum (application filed before 10/1/90);
 - A court decision granting withholding of deportation; or
 - A letter from an asylum officer granting withholding or deportation (if application filed on or after 10/1/90).

- Form I-688 Temporary Resident Card annotated “Section 245A” or Section 210”.

Form I-688B Employment Authorization Card annotated “Provision of Law 274a. 12(11)” or “Provision of Law 274a.12”.

- A receipt issued by the USCIS indicating that an application for issuance of a replacement document in one of the above listed categories has been made and the applicant’s entitlement to the document has been verified; or
- Other acceptable evidence. If other documents are determined by the USCIS to constitute acceptable evidence of eligible immigration status, they will be announced by notice published in the *Federal Register*

RESOLUTION NO. 2024 – 117
REVISIONS TO THE PUBLIC HOUSING ACOP

WHEREAS, staff of the Housing Authority of the City of Omaha (OHA) seeks to make revisions to specific policies in the Admissions and Continued Occupancy Policies (ACOP) for the public housing program;

WHEREAS, the revisions proposed in this Resolution of OHA’s Admissions and Continued Occupancy Policy (ACOP) include Chapter 7 for the public housing program;

WHEREAS, ACOP Chapter 7 has been brought current with all recent HUD requirements and guidance in only the areas that staff will apply prior to HOTMA full implementation;

WHEREAS, OHA staff recommends that the Board of Commissioners adopt the revised Chapter 7 of the Admissions and Continued Occupancy Policies;

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Commissioners hereby adopts the revised Chapter 7 of the Admissions and Continued Occupancy Policies.

David Levy, Chair
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Assistant Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held December 19, 2024.

Joanie Balk, Secretary
Housing Authority of the City of Omaha

6.2.3. Resolution 2024-118 Administrative Plan Revisions

Memorandum



To: OHA Board of Commissioners

From: Philisa Smith, Director of Housing Choice Voucher Program

Date: 12/12/24

Re: Revisions to Administrative Plan

RECOMMENDATION

Staff of the Housing Authority of the City of Omaha (OHA) recommends that the Board of Commissioners approve reviews of OHA's Administrative Plan Chapters 1 through 19 for the Housing Choice Voucher program.

BACKGROUND

OHA uses an Administrative Plan policy template purchased from Nan McKay & Associates, which is considered an industry standard and reflects best practices. For 2024, the Administrative Plan Chapters 1-19 have been brought current with all recent HUD requirements and guidance. The plan also includes several minor corrections, clarifications, spelling, and grammatical corrections. Many modifications expand the direction and verbiage, including the following:

Intro	HOTMA Introduction/Appendix
	• Explanation of HOTMA Changes throughout the plan • Explanation of the use of HQS and NSPIRE • HOTMA 102/104 Delayed Compliance-No date provided
Chapter 1	Overview of the Program and Plan
	• HOTMA voucher final rule to overview and History of the Program • Updated terminology from NSPIRE to "minimum quality standards" • Added policies on increases and decreases in the payment standard to the list of required content
Chapter 2	Fair Housing and Equal Opportunity
	• Policy updates regarding complaints due to discrimination, equal access, VAWA, and requested accommodations
Chapter 3	Eligibility
	• Added policies that will be effective prior to the PHA's HOTMA 102/104 compliance date

- Reference to asset and property restrictions
- Added families eligible for VASH to the list of eligible applicants
- Clarified language regarding EIV Income report
- Foster child and foster adult definition and policy
- Denial of admission if revocation of consent
- Denial of assistance changes
- Criminal background checks for adults
- Screening for eligibility changes
- Changes to notice of eligibility and denial
- VAWA language and policy changes

Chapter 4 Applications, Waiting List, and Tenant Selection

- Policy updates related to eligibility for placement on the waiting list
- Purging the waiting list policy updates

Chapter 5 Briefings and Voucher Issuance

- Increases the voucher search term
- Clarified fair housing and NSPIRE-related language to bring content current with the HOMTA final rule

Chapter 6 A/B Income and Subsidy Determinations

Pre-HOTMA & Post-HOTMA

- Splits chapter into two sections 6.A and 6. B
- 6. A no-red line edits contains OHA's current policy
- 6. B represents the policies OHA will use upon the HOTMA 102/104 compliance date This includes:
 - Clarification and corrections to student financial assistance requirements under HOTMA
 - Clarification of alimony and child support
 - Clarification regarding amounts adjusted annually under inflation under HOTMA
 - Updated the list of federally mandated income exclusions
 - Clarification regarding necessary and non-necessary personal property
 - Clarification regarding health and medical care expenses
 - Earned Income Disallowance for persons with disabilities
 - Calculating annual income methodology differences at initial, interim, and annual recertifications

	• Business income and self-employment income • Lump-sum payments for the delayed start of a periodic payment • Requires changes to the HOTMA final rule, including increases and decreases in payment standards pre- and post-HOTMA • Additions to the section on applying for utility allowances
Chapter 7	Verification Pre-HOTMA & Post-HOTMA • Splits chapter into two sections 7.A and 7. B • 7. A no-red line edits contains OHA's current policy • 7. B represents the policies OHA will use upon the HOTMA 102/104 including: • Changes regarding the use of consent forms specifically HUD 9886-A. • Clarification regarding amounts adjusted annually under inflation under HOTMA • Policy revisions for streamlined income determinations from fixed sources of income • Updates verification requirements, use of EIV +self-certification, verification of net family asset, and treatment of zero-income families
Chapter 8	National Standards for the Physical Inspection of Real Estate (NSPIRE) and Rent Reasonableness Determinations • Splits chapter into two sections 8.A and 8. B • 8. A no-red line edits contains OHA's current policy • 8. B represents the policies OHA will use upon the HOTMA 102/104 including: • Explanation of the continued use of the term housing quality standards • NSPIRE regulations for minimum or affirmative habitability requirements • Modifications to provide accessibility • Life-Threatening deficiencies • Owner and family responsibilities • Updates the Lead-based paint – requirements for children w/ elevated blood lead level • Violation of space standards • Inspection results; reinspection's; and correction timeframes • Rent reasonableness; market data; rent determination
Chapter 9	General Leasing Policies • Revisions reverts back to using the term housing quality standards as per HOTMA final

- Clarification regarding PHA-owned units
 - Clarifications regarding HAP contract execution
 - Updates HUD's NSPIRE standards
- Chapter 10 Moving with Continued Assistance and Portability
- Added section on family moves due to unit deficiencies
 - Clarifies policy regarding voucher issuances and term of the voucher
 - Clarifies Initial billing deadline
- Chapter 11 Reexaminations
- Splits chapter into two sections 11.A and 11. B
 - 11. A no-red line edits contains OHA's current policy
 - 11. B represents the policies OHA will use upon the HOTMA 102/104 including:
 - Clarification regarding calculating annual income at reexamination
 - Non-interim reexamination transactions
 - Notification, participation, conducting annual reexamination
 - Calculating annual income at annual reexamination
 - Interim reexaminations
 - Required revisions regarding changes in family unit size
 - Changes in family and household composition
 - Departure of family or household member
 - Concurrent increases in earned and unearned income; cumulative increases
 - Family reporting: changes reported timely and not timely
 - Non-interim reexamination transactions
- Chapter 12 Termination of Assistance and Tenancy Reexaminations
- Clarification Insufficient funding
 - Reverted references to housing quality standards
 - Statement of family obligations
- Chapter 13 Owners
- Clarifications to bring content in line with the HCV Landlord Strategies Guidebook
 - HAP contract terms and terminations
 - Reverted references to housing quality standards
- Chapter 14 Program Integrity
- Quality control & analysis of data
 - Reverted references to housing quality standards

Chapter 15	Special Housing Types • SRO (Single Room Occupancy) & NSPIRE • Congregate Housing & NSPIRE • Group Housing & NSPIRE • Manufactured Home & NSPIRE • Clarification on homeownership counseling and assistance – downpayment, financing, and monthly assistance; family eligibility and selection; home inspections; contract of sale; portability; denial or termination of assistance
Chapter 16	Program Administration • Administrative fee reserve • Extensive revisions concerning payment standards and the use of SAFMRs effective 1/1/2025 • Exception payment standards • Reasonable accommodation & individual relief • Conducting informal reviews & hearings • Owner or family debts to the PHA; Refusal of payment agreement; repayment agreement terms • Record retention • Record keeping for children with elevated blood lead level • Violence Against Women Act (VAWA). Human trafficking; technological abuse
Chapter 17	Project-Based Vouchers • Project base-up additional 10% of units • Owner proposal solicitation & selection procedures • Inspection & NSPIRE • Vacancy payments & filling vacancies • Organization of waiting list & addition of Units
Chapter 18 Demonstration	Project-Based Vouchers (PBV) Under the Rental Assistance (RAD) Program • Percentage limitation & Unit cap • Inspecting units & NSPIRE • Floating units • Filling vacancies; new admission families • Continuation of housing assistance payments; adjusting contract rents; phase-in tenant rent increases • Choice Mobility

Chapter 19 Special Purpose Vouchers

- Changes to the VASH Voucher section to account for federal requirements
- Changes to the Mainstream Voucher section to account for federal requirements

Chapter 10

MOVING WITH CONTINUED ASSISTANCE AND PORTABILITY

-INTRODUCTION

Freedom of housing choice is a hallmark of the housing choice voucher (HCV) program. In general, HUD regulations impose few restrictions on where families may live or move with HCV assistance.

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

This chapter sets forth HUD regulations and PHA policies governing moves within or outside the PHA's jurisdiction in two parts:

Part I: Moving with Continued Assistance. This part covers the general rules that apply to all moves by a family assisted under the PHA's HCV program, whether the family moves to another unit within the PHA's jurisdiction or to a unit outside the PHA's jurisdiction under portability.

Part II: Portability. This part covers the special rules that apply to moves by a family under portability, whether the family moves out of or into the PHA's jurisdiction. This part also covers the special responsibilities that the PHA has under portability regulations and procedures.

PART I: MOVING WITH CONTINUED ASSISTANCE

-10-I.A. ALLOWABLE MOVES

HUD lists six regulatory conditions under which an assisted family is allowed to move to a new unit with continued assistance. Permission to move is subject to the restrictions set forth in section 10-I.B.

- The family has a right to terminate the lease on notice to the owner (for the owner's breach or otherwise) and has given a notice of termination to the owner in accordance with the lease [24 CFR 982.354(b)(3)]. If the family terminates the lease on notice to the owner, the family must give the PHA a copy of the notice at the same time [24 CFR 982.354(d)(1)].
- The lease for the family's unit has been terminated by mutual agreement of the owner and the family [24 CFR 982.354(b)(1)(ii)].

PHA Policy

If the owner and the family and the owner mutually agree to terminate the lease for the family's unit, the family must give the PHA a copy of the termination agreement.

- The owner has given the family a notice to vacate, has commenced an action to evict the family, or has obtained a court judgment or other process allowing the owner to evict the family [24 CFR 982.354(b)(2)]. The family must give the PHA a copy of any owner eviction notice [24 CFR 982.551(g)].
- The family or a member of the family is or has been the victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, and the move is needed to protect the health or safety of the family or family member [see 24 CFR 982.354(b)(4)]. This condition applies even when the family has moved out of its unit in violation of the lease, with or without prior notification to the PHA, if the family or family member who is the victim reasonably believed that ~~they were~~he or she was imminently threatened by harm from further violence if ~~they he or she~~ remained in the unit [24 CFR 982.354(b)(4), 24 CFR 982.353(b)]. The PHA must adopt an emergency transfer plan as required by regulations at 24 CFR 5.2007(e).

PHA Policy

If a family requests permission to move with continued assistance or for an external transfer to another covered housing program operated by the PHA based on a claim that the move is necessary to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, the PHA will request that the resident request the emergency transfer using form HUD-5383, and the PHA will request documentation in accordance with section 16-IX.D of this plan.

The PHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the family or family member will suffice. In such cases the PHA will document the waiver in the family's file.

The PHA may choose to provide a voucher to facilitate an emergency transfer of the victim without first terminating the assistance of the perpetrator.

Before granting an emergency transfer, the PHA will ensure the victim is eligible to receive continued assistance based on the citizenship or immigration status of the victim.

The PHA has adopted an emergency transfer plan, which is included as Exhibit 16-3 to this plan and discusses external transfers to other covered housing programs.

- The PHA has terminated the HAP contract for the family's unit for the owner's breach [24 CFR 982.354(b)(1)(i)].
- The PHA determines that the family's current unit does not meet ~~the HQS~~ space standards because of an increase in family size or a change in family composition. In such cases, the PHA must issue the family a new voucher, and the family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for the family, the PHA must terminate the HAP contract for the family's old unit in accordance with the HAP contract terms and must notify both the family and the owner of the termination. The HAP contract terminates at the end of the calendar month that follows the calendar month in which the PHA gives notice to the owner. [24 CFR 982.403(a) and (c)]

10-I.B. FAMILY MOVES DUE TO UNIT DEFICIENCIES

Units in Abatement [24 CFR 982.404(d)(3)]

An owner may not terminate the tenancy of a family due to the PHA withholding or abating HAP for housing quality standards deficiencies that are not repaired timely. During the period that assistance is abated, the family may terminate tenancy by notifying the owner and the PHA. If the family chooses to terminate tenancy, the HAP contract will automatically terminate on the effective date of tenancy termination or the date the family vacates the unit, whichever is earlier. The PHA must promptly issue the family its voucher to move.

Upon receipt of a family's written notification that it wishes to move, the PHA will issue a voucher within 10 business days of the PHA's written approval to move. No briefing is required for these families. The PHA will follow the policies set forth in Chapter 5 on voucher term, extension, and expiration.

Termination of HAP Contract and Family Moves [24 CFR 982.404(e)]

For HAP contracts executed or renewed on or after June 6, 2024, if an owner fails to make required repairs within 60 days (or a reasonable longer period established by the PHA) of the notice of abatement, the PHA must terminate the HAP contract. In this case, the PHA must issue the family its voucher at least 30 days prior to the termination of the HAP contract. The family must be provided at least 90 days following the termination of the HAP contract to lease a new unit, although the PHA may provide a longer period as the PHA determines is reasonably necessary.

PHA Policy

The PHA will issue a family whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame a voucher no later than 30 days prior to the termination of the HAP contract. The initial term of the voucher will be 120 calendar days. No briefing is required for these families.

To continue under the tenant-based HCV program, the family must submit a Request for Tenancy Approval and proposed lease within the 120-day period unless the PHA grants an extension. The PHA will follow the policies set forth in Chapter 5 on voucher extension and expiration.

Offer of Public Housing [24 CFR 982.404(e)(2)]

If the family is unable to lease a new unit within the term of the voucher, and the PHA owns or operates public housing, the PHA must offer, and if accepted, provide the family a selection preference for an appropriate-sized public housing unit that first becomes available for occupancy after the time period expires.

PHA Policy

The PHA does operate a public housing program and will provide a preference for HCV families whose HAP contract is being terminated due to an owner failing to make required repairs within the required time frame, and who were unable to lease a new unit within the term of the voucher.

Thirty days prior to the expiration date of the voucher, the PHA will provide written notice to the family stating that the PHA does provide such a preference and providing an estimation of availability for the appropriate-sized public housing unit.

Relocation Assistance [24 CFR 982.404(e)(3)]

PHAs may assist families relocating due to the HAP contract being terminated as a result of the owner failing to make required repairs within the required time frame in finding a new unit, including using up to two months of the withheld and abated assistance payments for costs directly associated with relocating to a new unit, such as security deposits, temporary housing costs, or other reasonable moving costs as determined by the PHA based on their locality.

The PHA must assist families with disabilities with locating available accessible units in accordance with 24 CFR 8.28(a)(3).

PHA Policy

The PHA will assist families with disabilities with locating available accessible units in accordance with program requirements.

The PHA will use up to two months of withheld and abated payment to assist with any required security deposit at the new unit. Funds will not be used for any other relocation assistance.

If the family receives a refund of a security deposit for the new unit, the PHA will not require any amount to be remitted to the PHA.

10-I.CB. RESTRICTIONS ON MOVES

A family's right to move is generally contingent upon the family's compliance with program requirements [24 CFR 982.1(b)(2)]. HUD specifies two conditions under which a PHA may deny a family permission to move and two ways in which a PHA may restrict moves by a family.

Denial of Moves

HUD regulations permit the PHA to deny a family permission to move under the following conditions:

Insufficient Funding

The PHA may deny a family permission to move either within or outside the PHA's jurisdiction if the PHA does not have sufficient funding for continued assistance [24 CFR 982.354(e)(1)].

However, Notice PIH 2016-09 significantly restricts the ability of PHAs to deny permission to move due to insufficient funding and places further requirements on PHAs regarding moves denied due to lack of funding. The requirements found in this notice are mandatory.

PHA Policy

The PHA will deny a family permission to move on grounds that the PHA does not have sufficient funding for continued assistance if (a) the move is initiated by the family, not the owner or the PHA; (b) the PHA can demonstrate that the move will, in fact, result in higher subsidy costs (c) the PHA can demonstrate, in accordance with the policies in Part VIII of Chapter 16, that it does not have sufficient funding in its annual budget to accommodate the higher subsidy costs; and (d) for portability moves, the receiving PHA is not absorbing the voucher.

If the PHA does not have sufficient funding for continued assistance, but the family must move from their unit (e.g., the unit failed HQS-inspection), the family may move to a higher cost unit if the move is within the PHA's jurisdiction. The PHA, however, will not allow the family to move under portability in this situation if the family wishes to move to a higher cost area.

For both moves within the PHA's jurisdiction and outside under portability, the PHA will not deny a move due to insufficient funding if the PHA previously approved the move and subsequently experienced a funding shortfall if the family cannot remain in their current unit. The PHA will rescind the voucher in this situation if the family will be allowed to remain in their current unit.

The PHA will create a list of families whose moves have been denied due to insufficient funding. The PHA will keep the family's request open indefinitely, and when funds become available, the families on this list will take precedence over families on the waiting list. The PHA will use the same procedures for notifying families with open requests to move when funds become available as it uses for notifying families on the waiting list (see section 4-III.D).

The PHA will inform the family of its policy regarding moves denied due to insufficient funding in a letter to the family at the time the move is denied.

Grounds for Denial or Termination of Assistance

The PHA may deny a family permission to move if it has grounds for denying or terminating the family's assistance [24 CFR 982.354(e)(2)].

PHA Policy

If the PHA has grounds for denying or terminating a family's assistance, the PHA will act on those grounds in accordance with the regulations and policies set forth in Chapters 3 and 12, respectively. In general, it will not deny a family permission to move for this reason; however, it retains the discretion to do so under special circumstances.

Restrictions on Elective Moves [24 CFR 982.354(c)]

HUD regulations permit the PHA to prohibit any elective move by a participant family during the family's initial lease term. They also permit the PHA to prohibit more than one elective move by a participant family during any 12-month period. However, such prohibitions, if adopted, do not apply when the family or a member of the family is or has been the victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, and the move is needed to protect the health or safety of the family or family member. (For the policy on documentation of abuse, see section 10-I.A.) In addition, the PHA may not establish a policy permitting moves only at reexamination [Notice PIH 2016-09].

PHA Policy

The PHA will deny a family permission to make an elective move during the family's initial lease term. This policy applies to moves within the PHA's jurisdiction or outside it under portability.

The PHA will also deny a family permission to make more than one elective move during any 12-month period. This policy applies to all assisted families residing in the PHA's jurisdiction.

The PHA will consider exceptions to these policies for the following reasons: to protect the health or safety of a family member (e.g., lead-based paint hazards, domestic violence, witness protection programs), to accommodate a change in family circumstances (e.g., new employment, school attendance in a distant area), or to address an emergency situation over which a family has no control.

In addition, the PHA will allow exceptions to these policies for purposes of reasonable accommodation of a family member who is a person with disabilities (see Chapter 2).

10-I.DC. MOVING PROCESS

Notification

If a family wishes to move to a new unit, the family must notify the PHA and the owner before moving out of the old unit or terminating the lease on notice to the owner [24 CFR 982.354(d)(2)]. If the family wishes to move to a unit outside the PHA's jurisdiction under portability, the notice to the PHA must specify the area where the family wishes to move [24 CFR 982.354(d)(2)]. The notices must be in writing [24 CFR 982.5].

Approval

PHA Policy

Upon receipt of a family's notification that it wishes to move, the PHA will determine whether the move is approvable in accordance with the regulations and policies set forth in sections 10-I.A and 10-I.B. The PHA will notify the family in writing of its determination within 10 business days following receipt of the family's notification.

Reexamination of Family Income and Composition

PHA Policy

For families approved to move to a new unit within the PHA's jurisdiction, the PHA will perform a new annual reexamination in accordance with the policies set forth in [Chapter 11 of this plan](#).

For families moving into or families approved to move out of the PHA's jurisdiction under portability, the PHA will follow the policies set forth in Part II of this chapter.

Voucher Issuance and Briefing

PHA Policy

For families approved to move to a new unit within the PHA's jurisdiction, the PHA will issue a new voucher within 10 business days of the PHA's written approval to move. No briefing is required for these families. The PHA will follow the policies set forth in Chapter 5 on voucher term, extension, and expiration. If a family does not locate a new unit within the term of the voucher and any extensions, the family may remain in its current unit with continued voucher assistance if the owner agrees and the PHA approves. Otherwise, the family will lose its assistance.

For families moving into or families approved to move out of the PHA's jurisdiction under portability, the PHA will follow the policies set forth in Part II of this chapter.

[For families moving due an owner failing to make required repairs timely, resulting in the PHA terminating the HAP contract, the PHA will follow the policies set forth earlier in this section and in Chapter 8, Part II.](#)

Housing Assistance Payments [24 CFR 982.311(d)]

When a family moves out of an assisted unit, the PHA may not make any housing assistance payment to the owner for any month **after** the month the family moves out. The owner may keep the housing assistance payment for the month when the family moves out of the unit.

If a participant family moves from an assisted unit with continued tenant-based assistance, the term of the assisted lease for the new assisted unit may begin during the month the family moves out of the first assisted unit. Overlap of the last housing assistance payment (for the month when the family moves out of the old unit) and the first assistance payment for the new unit, is not considered to constitute a duplicative housing subsidy.

Zero HAP Families Who Wish to Move [24 CFR 982.455]

~~If a family becomes zero HAP as a result of a reexamination, the family may continue as program participants for six months from the date of the reexamination effective date. During this period, the HAP contract remains in effect. If family circumstances change during this period, the PHA conducts an interim and reinstates assistance. After 180 calendar days since the last housing assistance payment to the owner, however, the HAP contract automatically terminates.~~

A participant who is not receiving any subsidy, but whose HAP contract is still in force, may request a voucher to move to a different unit. The PHA must issue a voucher to move unless it has grounds to deny assistance under the program regulations. However, if the PHA determines no subsidy would be paid at the new unit, the PHA may refuse to enter into a HAP contract on behalf of the family.

PHA Policy

If a zero HAP family requests to move to a new unit, the family may request a voucher to move. However, if no subsidy will be paid at the unit to which the family requests to move, the PHA will not enter into a HAP contract on behalf of the family for the new unit.

PART II: PORTABILITY

10-II.A. OVERVIEW

Within the limitations of the regulations and this plan, a participant family or an applicant family that has been issued a voucher has the right to use tenant-based voucher assistance to lease a unit anywhere in the United States providing that the unit is located within the jurisdiction of a PHA administering a tenant-based voucher program [24 CFR 982.353(b)]. The process by which a family obtains a voucher from one PHA and uses it to lease a unit in the jurisdiction of another PHA is known as portability. The PHA that issues the voucher is called the **initial PHA**. The PHA that has jurisdiction in the area to which the family wants to move is called the **receiving PHA**.

The receiving PHA has the option of administering the family's voucher for the initial PHA or absorbing the family into its own program. Under the first option, the receiving PHA provides all housing services for the family and bills the initial PHA for the family's housing assistance payments and the fees for administering the family's voucher. Under the second option, the receiving PHA pays for the family's assistance with its own program funds, and the initial PHA has no further relationship with the family. The initial PHA must contact the receiving PHA via email or other confirmed delivery method to determine whether the receiving PHA will administer or absorb the initial PHA's voucher. Based on the receiving PHA's response, the initial PHA must determine whether they will approve or deny the portability request [Notice PIH 2016-09].

PHAs commonly act as both the initial and receiving PHA because families may move into or out of their jurisdiction under portability. Each role involves different responsibilities. The PHA will follow the rules and policies in section 10-II.B when it is acting as the initial PHA for a family. It will follow the rules and policies in section 10-II.C when it is acting as the receiving PHA for a family.

In administering portability, the initial PHA and the receiving PHA must comply with financial procedures required by HUD, including the use of HUD-required forms [24 CFR 982.355(e)(5)].

PHAs must also comply with billing and payment deadlines. HUD may reduce an administrative fee to an initial or receiving PHA if the PHA does not comply with HUD portability requirements [24 CFR 982.355(e)(7)].

10-II.B. INITIAL PHA ROLE

Allowable Moves under Portability

A family may move with voucher assistance only to an area where there is at least one PHA administering a voucher program [24 CFR 982.353(b)]. If there is more than one PHA in the area, the initial PHA provides the family with the contact information for the receiving PHAs that serve the area, and the family selects the receiving PHA. The family must inform the initial PHA which receiving PHA it has selected. If the family prefers not to select the receiving PHA, the initial PHA will select the receiving PHA on behalf of the family [24 CFR 982.255(b)].

Applicant families that have been issued vouchers as well as participant families may qualify to lease a unit outside the PHA's jurisdiction under portability. HUD regulations and PHA policy determine whether a family qualifies.

Applicant Families

Under HUD regulations, most applicant families qualify to lease a unit outside the PHA's jurisdiction under portability. However, HUD gives the PHA discretion to deny a portability move by an applicant family for the same two reasons that it may deny any move by a participant family: insufficient funding and grounds for denial or termination of assistance. If a PHA intends to deny a family permission to move under portability due to insufficient funding, the PHA must notify HUD within 10 business days of the determination to deny the move [24 CFR 982.355(e)].

PHA Policy

In determining whether or not to deny an applicant family permission to move under portability because the PHA lacks sufficient funding or has grounds for denying assistance to the family, the initial PHA will follow the policies established in section -10--I.B of this chapter. If the PHA does deny the move due to insufficient funding, -the PHA will notify HUD in writing within 10 business days of the PHA's determination to deny the move.

In addition, the initial PHA may establish a policy denying the right to portability to nonresident applicants during the first 12 months after they are admitted to the program [24 CFR 982.353(c)].

PHA Policy

If neither the head of household nor the spouse/cohead of an applicant family had a domicile (legal residence) in the initial PHA's jurisdiction at the time that the family's initial application for assistance was submitted, the family must lease a unit within the initial PHA's jurisdiction for at least 12 months before requesting portability.

The PHA will consider exceptions to this policy for purposes of reasonable accommodation (see Chapter 2) or reasons related to domestic violence, dating violence, sexual assault, stalking, or human trafficking.

Participant Families

The initial PHA must not provide portable assistance for a participant if a family has moved out of its assisted unit in violation of the lease [24 CFR 982.353(b)]. The Violence against Women Act ~~of 2013~~ (VAWA) creates an exception to this prohibition for families who are otherwise in compliance with program obligations but have moved to protect the health or safety of a family member who is or has been a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, and who reasonably believed ~~they were~~~~he or she was~~ imminently threatened by harm from further violence if ~~they~~~~he or she~~ remained in the unit [see 24 CFR 982.353(b)].

PHA Policy

The PHA will determine whether a participant family may move out of the PHA's jurisdiction with continued assistance in accordance with the regulations and policies set forth here and in sections 10-I.A and 10-I.B of this chapter. The PHA will notify the family of its determination in accordance with the approval policy set forth in section 10-I.C of this chapter.

Determining Income Eligibility

-Applicant Families

An applicant family may lease a unit in a particular area under portability only if the family is income eligible for admission to the voucher program in that area [24 CFR 982.353(d)(1)]. The family must specify the area to which the family wishes to move [24 CFR 982.355(c)(1)].

The initial PHA is responsible for determining whether the family is income eligible in the area to which the family wishes to move [24 CFR 982.353(d)(1), 24 CFR 982.355(9)]. If the applicant family is not income eligible in that area, the PHA must inform the family that it may not move there and receive voucher assistance [Notice PIH 2016-09].

Participant Families

The income eligibility of a participant family is not redetermined if the family moves to a new jurisdiction under portability [24 CFR 982.353(d)(2)].

Reexamination of Family Income and Composition

No new reexamination of family income and composition is required for an applicant family.

PHA Policy

For a participant family approved to move out of its jurisdiction under portability, the PHA generally will conduct a reexamination of family income and composition only if the family's annual reexamination must be completed on or before the initial billing deadline specified on form HUD-52665, Family Portability Information.

The PHA will make any exceptions to this policy necessary to remain in compliance with HUD regulations.

Briefing

The regulations and policies on briefings set forth in Chapter 5 of this plan require the PHA to provide information on portability to all applicant families that qualify to lease a unit outside the PHA's jurisdiction under the portability procedures. Therefore, no special briefing is required for these families.

PHA Policy

No formal briefing will be required for a participant family wishing to move outside the PHA's jurisdiction under portability. However, the PHA will provide the family with the same oral and written explanation of portability that it provides to applicant families selected for admission to the program (see Chapter 5).

The PHA will provide the name, address, and phone of the contact for the PHAs in the jurisdiction to which they wish to move. If there is more than one PHA with jurisdiction over the area to which the family wishes to move, the PHA will advise the family that the family selects the receiving PHA and notify the initial PHA of which receiving PHA was selected. The PHA will provide the family with contact information for all of the receiving PHAs that serve the area. The PHA will not provide any additional information about receiving PHAs in the area. The PHA will further inform the family that if the family prefers not to select the receiving PHA, the initial PHA will select the receiving PHA on behalf of the family. In this case, the PHA will not provide the family with information for all receiving PHAs in the area.

The PHA will advise the family that they will be under the receiving PHA's policies and procedures, including screening, subsidy standards, voucher extension policies, and payment standards.

Voucher Issuance and Term

An applicant family has no right to portability until after the family has been issued a voucher [24 CFR 982.353(b)]. In issuing vouchers to applicant families, the PHA will follow the regulations and procedures set forth in Chapter 5.

PHA Policy

For participating families approved to move under portability, the PHA will issue a new voucher within 10 business days of the PHA's written approval to move.

The initial term of the voucher will be ~~60~~-120 days.

However, if the move is due to the HAP contract being terminated due to an owner failing to make required repairs within the required time frame, the PHA will issue the family a voucher no later than 30 days prior to the termination of the HAP contract. The initial term of the voucher will be 120 calendar days.

Voucher Extensions and Expiration

PHA Policy

The initial PHA will approve **no** extensions to a voucher issued to an applicant or participant family porting out of the PHA's jurisdiction except under the following circumstances:

(a) the initial term of the voucher will expire before the portable family will be issued a voucher by the receiving PHA, (b) the family decides to return to the initial PHA's jurisdiction and search for a unit there, or (c) the family decides to search for a unit in a third PHA's jurisdiction. In such cases, the policies on voucher extensions set forth in Chapter 5, section 5-II.E, of this plan will apply, including the requirement that the family apply for an extension in writing prior to the expiration of the initial voucher term.

PHA Policy

Chapter 5, section 5-II

The initial voucher term will be ~~60~~ 120 calendar days.

The family must submit a Request for Tenancy Approval and proposed lease within the ~~60~~ 120-day period.

The PHA will only grant extensions based upon circumstances mentioned below.

Extension beyond 120 days is subject to PHA approval to accommodate a Reasonable Accommodation request.

~~To receive or continue receiving assistance under the initial PHA's voucher program, a family that moves to another PHA's jurisdiction under portability must be under HAP contract in the receiving PHA's jurisdiction within 90 days following the expiration date of the initial PHA's voucher term (including any extensions). (See below under "Initial Billing Deadline" for one exception to this policy.)~~

Preapproval Contact with the Receiving PHA

Prior to approving a family's request to move under portability, the initial PHA must contact the receiving PHA via email or other confirmed delivery method to determine whether the receiving PHA will administer or absorb the family's voucher. Based on the receiving PHA's response, the initial PHA must determine whether it will approve or deny the move [24 CFR 982.355(c)(3)].

PHA Policy

The PHA will use email, when possible, to contact the receiving PHA regarding whether the receiving PHA will administer or absorb the family's voucher.

Initial Notification to the Receiving PHA

After approving a family's request to move under portability, the initial PHA must promptly notify the receiving PHA via email or other confirmed delivery method to expect the family [24 CFR 982.355(c)(3); 24 CFR 982.355(c)(7)]. The initial PHA must also advise the family how to contact and request assistance from the receiving PHA [24 CFR 982.355(c)(6)].

PHA Policy

Because the portability process is time-sensitive, the PHA will notify the receiving PHA by phone, ~~fax~~, or email to expect the family. The initial PHA will also ask the receiving PHA to provide any information the family may need upon arrival, including the name, ~~fax~~, email address, and telephone number of the staff person responsible for business with incoming portable families and procedures related to appointments for voucher issuance. The PHA will pass this information along to the family. The PHA will also ask for the name, address, telephone number, ~~fax~~ and email of the person responsible for processing the billing information.

Sending Documentation to the Receiving PHA

The initial PHA is required to send the receiving PHA the following documents:

- Form HUD-52665, Family Portability Information, with Part I filled out [Notice PIH 2016-09]
- A copy of the family's voucher [Notice PIH 2016-09]
- A copy of the family's most recent form HUD-50058, Family Report, or, if necessary in the case of an applicant family, family and income information in a format similar to that of form HUD-50058 [24 CFR 982.355(c)(7), Notice PIH 2016-09]
- Copies of the income verifications backing up the form HUD-50058, including a copy of the family's current EIV data [24 CFR 982.355(c)(7), Notice PIH 2016-09]

PHA Policy

In addition to these documents, the PHA will provide the following information, if available, to the receiving PHA:

Social security numbers (SSNs)

Documentation of SSNs for all nonexempt household members whose SSNs have not been verified through the EIV system

Documentation of legal identity

Documentation of citizenship or eligible immigration status

Documentation of participation in the earned income disallowance (EID) benefit

-Documentation of participation in a family self-sufficiency (FSS) program

If applicable, information related to the family's health and medical care and disability assistance expense phased-in hardship exemption, including what ~~stage~~state the family is in and how many months remain in that phase-in stage-

The PHA will notify the family in writing regarding any information provided to the receiving PHA [HCV GB, p. 13-3].

Initial Billing Deadline [Notice PIH 2016-09]

The deadline for submission of initial billing is 90 days following the expiration date of the voucher issued to the family by the initial PHA. In cases where suspension of the voucher delays the initial billing submission, the receiving PHA must notify the initial PHA of delayed billing before the billing deadline and document the delay is due to the suspension. In this case, the initial PHA must extend the billing deadline by 30 days.

If the initial PHA does not receive a billing notice by the deadline and does not intend to honor a late billing submission, it must notify the ~~receiving~~initial PHA in writing. The initial PHA may report to HUD the receiving PHA's failure to comply with the deadline.

If the initial PHA will honor the late billing, no action is required.

PHA Policy

~~If the PHA has not received an initial billing notice from the receiving PHA within the billing deadline, it will contact the receiving PHA to inform them that it will not honor a late billing submission and will return any subsequent billings that it receives on behalf of the family. The PHA will send the receiving PHA a written confirmation of its decision by mail.~~

~~The PHA will allow an exception to this policy if the family includes a person with disabilities and the late billing is a result of a reasonable accommodation granted to the family by the receiving PHA.~~

~~The initial PHA's decision as to whether to accept late billing will be based on internal PHA factors, including the initial PHA's leasing or funding status. -If the PHA has not received an initial billing notice from the receiving PHA within the billing deadline and does not intend to honor the late billing, it will contact the receiving PHA to inform them that it will not honor a late billing submission and will return any subsequent billings that it receives on behalf of the family. -In this case, the PHA will send the receiving PHA a written confirmation of its decision by mail.~~

~~Among other considerations as to whether to accept late billing will be if the family includes a person with disabilities and the late billing is a result of a reasonable accommodation granted to the family by the receiving PHA.~~

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Monthly Billing Payments [24 CFR 982.355(e), Notice PIH 2016-09]

If the receiving PHA is administering the family's voucher, the receiving PHA bills the initial PHA for housing assistance payments and administrative fees. When reimbursing for administrative fees, the initial PHA must promptly reimburse the receiving PHA for the lesser of 80 percent of the initial PHA ongoing administrative fee or 100 percent of the receiving PHA's ongoing administrative fee for each program unit under contract on the first day of the month for which the receiving PHA is billing the initial PHA under portability. If the administrative fees are prorated for the HCV program, the proration will apply to the amount of the administrative fee for which the receiving PHA may bill [24 CFR 982.355(e)(2)].

The initial PHA is responsible for making billing payments in a timely manner. The first billing amount is due within 30 calendar days after the initial PHA receives Part II of form HUD-52665 from the receiving PHA. Subsequent payments must be **received** by the receiving PHA no later than the fifth business day of each month. The payments must be provided in a form and manner that the receiving PHA is able and willing to accept.

The initial PHA may not terminate or delay making payments under existing portability billing arrangements as a result of ~~overleasing~~~~over-leasing~~ or funding shortfalls. The PHA must manage its tenant-based program in a manner that ensures that it has the financial ability to provide assistance for families that move out of its jurisdiction under portability and are not absorbed by receiving PHAs as well as for families that remain within its jurisdiction.

PHA Policy

The initial PHA will utilize direct deposit to ensure that the payment is received by the deadline unless the receiving PHA notifies the initial PHA that direct deposit is not acceptable to them. If the initial PHA extends the term of the voucher, the receiving PHA's voucher will expire 30 calendar days from the new expiration date of the initial PHA's voucher.

Annual Updates of Form HUD-50058

If the initial PHA is being billed on behalf of a portable family, it should receive an updated form HUD-50058 each year from the receiving PHA. If the initial PHA fails to receive an updated 50058 by the family's annual reexamination date, the initial PHA should contact the receiving PHA to verify the status of the family. The initial PHA must continue paying the receiving PHA based on the last form HUD-50058 received, unless instructed otherwise by HUD. The initial PHA may seek absorption of the vouchers by following steps outlined in Notice PIH 2016-09.

Denial or Termination of Assistance [24 CFR 982.355(c)(17)]

At any time, either the initial PHA or the receiving PHA may make a determination to deny or terminate assistance with the family in accordance with 24 CFR 982.552 and 24 CFR 982.553. (For PHA policies on denial and termination, see Chapters 3 and 12, respectively.)

10-II.C. RECEIVING PHA ROLE

If a family has a right to lease a unit in the receiving PHA's jurisdiction under portability, the receiving PHA must provide assistance for the family [24 CFR 982.355(10)]. HUD may determine in certain instances that a PHA is not required to accept incoming portable families, such as a PHA in a declared disaster area. However, the PHA must have approval in writing from HUD before refusing any incoming portable families [24 CFR 982.355(b)].

Administration of the voucher must be in accordance with the receiving PHA's policies. This requirement also applies to policies of Moving to Work agencies. The receiving PHA procedures and preferences for selection among eligible applicants do not apply to the family, and the receiving PHA waiting list is not used [24 CFR 982.355(c)(10)]. The family's unit, or voucher, size is determined in accordance with the subsidy standards of the receiving PHA [24 CFR 982.355(c)(12)], and the receiving PHA's policies on extensions of the voucher term apply [24 CFR 982.355(c)(14)].

Responding to Initial PHA's Request [24 CFR 982.355(c)]

The receiving PHA must respond via email or other confirmed delivery method to the initial PHA's inquiry to determine whether the family's voucher will be billed or absorbed [24 CFR 982.355(c)(3)]. If the receiving PHA informs the initial PHA that it will be absorbing the voucher, the receiving PHA cannot reverse its decision at a later date without consent of the initial PHA (24 CFR 982.355(c)(4)).

PHA Policy

The PHA will use email, when possible, to notify the initial PHA whether it will administer or absorb the family's voucher.

Initial Contact with Family

When a family moves into the PHA's jurisdiction under portability, the family is responsible for promptly contacting the PHA and complying with the PHA's procedures for incoming portable families. The family's failure to comply may result in denial or termination of the receiving PHA's voucher [24 CFR 982.355(c)(8)].

If the voucher issued to the family by the initial PHA has expired, the receiving PHA must contact the initial PHA to determine if it will extend the voucher [24 CFR 982.355(c)(13)]. An informal hearing is not required when a voucher has expired without the family leasing a unit.

If for any reason the receiving PHA refuses to process or provide assistance to a family under the portability procedures, the family must be given the opportunity for an informal review or hearing [Notice PIH 2016-09]. (For more on this topic, see later under "Denial or Termination of Assistance.")

of Assistance.")

Briefing

HUD allows the receiving PHA to require a briefing for an incoming portable family as long as the requirement does not unduly delay the family's search [Notice PIH 2016-09].

PHA Policy

The PHA will not require the family to attend a briefing. The PHA will provide the family with a briefing packet (as described in Chapter 5) and, in an individual briefing, will orally inform the family about the PHA's payment and subsidy standards, procedures for requesting approval of a unit, the unit inspection process, and the leasing process. The PHA will suggest that the family attend a full ~~or pre-scheduled~~ briefing at a later date.

Income Eligibility and Reexamination

The receiving PHA does not redetermine eligibility for a portable family that was already receiving assistance in the initial PHA's voucher program [24 CFR 982.355(c)(9)]. If the receiving PHA opts to conduct a new reexamination for a current participant family, the receiving PHA may not delay issuing the family a voucher or otherwise delay approval of a unit [24 CFR 982.355(c)(11)].

PHA Policy

For any family moving into its jurisdiction under portability, the PHA will conduct a new reexamination of family income and composition. However, the PHA will not delay issuing the family a voucher for this reason. Nor will the PHA delay approving a unit for the family until the reexamination process is complete unless the family is an applicant and the PHA cannot otherwise confirm that the family is income eligible for admission to the program in the area where the unit is located.

In conducting its own reexamination, the PHA will rely upon any verifications provided by the initial PHA to the extent that they (a) accurately reflect the family's current circumstances and (b) were obtained within the last 120 days. Any new information may be verified by documents provided by the family and adjusted, if necessary, when third party verification is received.

Voucher Issuance

When a family moves into its jurisdiction under portability, the receiving PHA is required to issue the family a voucher [24 CFR 982.355(c)(13)]. The family must submit a request for tenancy approval to the receiving PHA during the term of the receiving PHA's voucher [24 CFR 982.355(c)(15)].

Timing of Voucher Issuance

HUD expects the receiving PHA to issue the voucher within two weeks after receiving the family's paperwork from the initial PHA if the information is in order, the family has contacted the receiving PHA, and the family complies with the receiving PHA's procedures [Notice [PIH 2016-09](#)].
~~PIH 2016-09~~].

PHA Policy

When a family ports into its jurisdiction, the PHA will issue the family a voucher based on the paperwork provided by the initial PHA unless the family's paperwork from the initial PHA is incomplete, the family's voucher from the initial PHA has expired or the family does not comply with the PHA's procedures. The PHA will update the family's information when verification has been completed.

Voucher Term

The term of the receiving PHA's voucher may not expire before 30 calendar days from the expiration of the initial PHA's voucher [24 CFR 982.355(c)(13)]. If the initial PHA extends the term of the voucher, the receiving PHA's voucher may not expire before 30 days from the new expiration date of the initial PHA's voucher [Notice PIH 2016-09].

PHA Policy

The receiving PHA's voucher will expire 30 calendars days from the expiration date of the initial PHA's voucher. If the initial PHA extends the term of the voucher, the receiving PHA's voucher will expire 30 calendar days from the new expiration date of the initial PHA's voucher.

Voucher Extensions [24 CFR 982.355(c)(14), Notice 2016-09]

Once the receiving PHA issues the portable family a voucher, the receiving PHA's policies on extensions of the voucher term apply. The receiving PHA must inform the initial PHA of any extension granted to the term of the voucher. It must also bear in mind the billing deadline provided by the initial PHA. Unless willing and able to absorb the family, the receiving PHA should ensure that any voucher expiration date would leave sufficient time to process a request for tenancy approval, execute a HAP contract, and deliver the initial billing to the initial PHA.

PHA Policy

The PHA generally will not extend the term of the voucher that it issues to an incoming portable family unless the PHA plans to absorb the family into its own program, in which case it will follow the policies on voucher extension set forth in section 5-II.E.

The PHA will consider an exception to this policy as a reasonable accommodation to a person with disabilities (see Chapter 2).

Voucher Suspensions [24 CFR 982.303, 24 CFR 982.355(c)(15)]

If the family submits a request for tenancy approval during the term of the receiving PHA's voucher, the PHA must suspend the term of that voucher. The term of the voucher stops from the date that the family submits a request for PHA approval of the tenancy until the date the PHA notifies the family in writing whether the request has been approved or denied [24 CFR 982.4(b)] (see Section 5-II.E).

Notifying the Initial PHA

The receiving PHA must promptly notify the initial PHA if the family has leased an eligible unit under the program or if the family fails to submit a request for tenancy approval for an eligible unit within the term of the receiving PHA's voucher [24 CFR 982.355(c)(16)]. The receiving PHA is required to use Part II of form HUD-52665, Family Portability Information, for this purpose [Notice PIH 2016-09]. (For more on this topic and the deadline for notification, see below under "Administering a Portable Family's Voucher.")

If an incoming portable family ultimately decides not to lease in the jurisdiction of the receiving PHA but instead wishes to return to the initial PHA's jurisdiction or to search in another jurisdiction, the receiving PHA must refer the family back to the initial PHA. In such a case the voucher of record for the family is once again the voucher originally issued by the initial PHA. Any extension of search time provided by the receiving PHA's voucher is only valid for the family's search in the receiving PHA's jurisdiction [Notice PIH 2016-09].

Administering a Portable Family's Voucher

Portability Billing [24 CFR 982.355(e)]

To cover assistance for a portable family that was not absorbed, the receiving PHA bills the initial PHA for housing assistance payments and administrative fees. The amount of the housing assistance payment for a portable family in the receiving PHA's program is determined in the same manner as for other families in the receiving PHA's program.

The receiving PHA may bill the initial PHA for the lesser of 80 percent of the initial PHA's ongoing administrative fee or 100 percent of the receiving PHA's ongoing administrative fee for each program unit under contract on the first day of the month for which the receiving PHA is billing the initial PHA under portability. If the administrative fees are prorated for the HCV program, the proration will apply to the amount of the administrative fee for which the receiving PHA may bill (i.e., the receiving PHA may bill for the lesser of 80 percent of the initial PHA's prorated ongoing administrative fee or 100 percent of the receiving PHA's ongoing administrative fee).

If both PHAs agree, the PHAs may negotiate a different amount of reimbursement.

PHA Policy

~~Unless the PHA negotiates a different amount of reimbursement with the initial PHA~~ The PHA will bill the initial PHA the maximum amount of administrative fees allowed, ensuring any administrative fee proration has been properly applied. **Fees are not negotiable.**

Initial Billing Deadline

If a portable family's search for a unit is successful and the receiving PHA intends to administer the family's voucher, the receiving PHA must submit its initial billing notice (Part II of form HUD-52665) in time that the notice will be **received** no later than 90 days following the expiration date of the family's voucher issued by the initial PHA [Notice PIH 2016-09]. This deadline may be extended for 30 additional days if the delay is due to suspension of the voucher's term (see Initial Billing Section). A copy of the family's form HUD-50058, Family Report, completed by the receiving PHA must be attached to the initial billing notice. The receiving PHA may send these documents by mail, ~~fax~~, or email.

PHA Policy

The PHA will send its initial billing notice by ~~fax or~~ email, if necessary, to meet the billing deadline but will also send the notice by regular mail.

If the receiving PHA fails to send the initial billing by the deadline, it is required to absorb the family into its own program unless (a) the initial PHA is willing to accept the late submission or (b) HUD requires the initial PHA to honor the late submission (e.g., because the receiving PHA is over leased~~over leased~~) [Notice PIH 2016-09].

Ongoing Notification Responsibilities [Notice PIH 2016-09, HUD-52665]

Annual Reexamination. The receiving PHA must send the initial PHA a copy of a portable family's updated form HUD-50058 after each annual reexamination for the duration of time the receiving PHA is billing the initial PHA on behalf of the family, regardless of whether there is a change in the billing amount.

PHA Policy

The PHA will send a copy of the updated HUD-50058 by regular mail no later than 10 business days after the effective date of the reexamination.

Change in Billing Amount. The receiving PHA is required to notify the initial PHA, using form HUD-52665, of any change in the billing amount for the family as a result of:

- A change in the HAP amount (because of a reexamination, a change in the applicable payment standard, a move to another unit, etc.)
- An abatement or subsequent resumption of the HAP payments
- Termination of the HAP contract
- Payment of a damage/vacancy loss claim for the family
- Termination of the family from the program

The timing of the notice of the change in the billing amount should correspond with the notification to the owner and the family in order to provide the initial PHA with advance notice of the change. Under no circumstances should the notification be later than 10 business days following the effective date of the change in the billing amount. If the receiving PHA fails to send Form HUD-52665 within 10 days of effective date of billing changes, the initial PHA is not responsible for any increase prior to notification. If the change resulted in a decrease in the monthly billing amount, the initial PHA will offset future monthly payments until the difference is reconciled.

Late Payments [Notice PIH 2016-09]

If the initial PHA fails to make a monthly payment for a portable family by the fifth business day of the month, the receiving PHA must promptly notify the initial PHA in writing of the deficiency. The notice must identify the family, the amount of the billing payment, the date the billing payment was due, and the date the billing payment was received (if it arrived late). The receiving PHA must send a copy of the notification to the Office of Public Housing (OPH) in the HUD area office with jurisdiction over the receiving PHA. If the initial PHA fails to correct the problem by the second month following the notification, the receiving PHA may request by memorandum to the director of the OPH with jurisdiction over the receiving PHA that HUD transfer the unit in question. A copy of the initial notification and any subsequent correspondence between the PHAs on the matter must be attached. The receiving PHA must send a copy of the memorandum to the initial PHA. If the OPH decides to grant the transfer, the billing arrangement on behalf of the family ceases with the transfer, but the initial PHA is still responsible for any outstanding payments due to the receiving PHA.

Overpayments [Notice PIH 2016-09]

In all cases where the receiving PHA has received billing payments for billing arrangements no longer in effect, the receiving PHA is responsible for returning the full amount of the overpayment (including the portion provided for administrative fees) to the initial PHA.

In the event that HUD determines billing payments have continued for at least three months because the receiving PHA failed to notify the initial PHA that the billing arrangement was terminated, the receiving PHA must take the following steps:

- Return the full amount of the overpayment, including the portion provided for administrative fees, to the initial PHA.
- Once full payment has been returned, notify the Office of Public Housing in the HUD area office with jurisdiction over the receiving PHA of the date and the amount of reimbursement to the initial PHA.

At HUD's discretion, the receiving PHA will be subject to the sanctions spelled out in Notice PIH 2016-09.

Denial or Termination of Assistance

At any time, the receiving PHA may make a determination to deny or terminate assistance to a portable family for family action or inaction [24 CFR 982.355(c)(17)].

In the case of a termination, the PHA should provide adequate notice of the effective date to the initial PHA to avoid having to return a payment. In no event should the receiving PHA fail to notify the initial PHA later than 10 business days following the effective date of the termination of the billing arrangement [HUD-52665; Notice PIH 2016-09].

PHA Policy

If the PHA elects to deny or terminate assistance for a portable family, the PHA will notify the initial PHA within 10 business days after the informal review or hearing if the denial or termination is upheld. The PHA will base its denial or termination decision on the policies set forth in Chapter 3 or Chapter 12, respectively. The informal review or hearing will be held in accordance with the policies in Chapter 16. The receiving PHA will furnish the initial PHA with a copy of the review or hearing decision.

Absorbing a Portable Family

The receiving PHA may absorb an incoming portable family into its own program when the PHA executes a HAP contract on behalf of the family or at any time thereafter providing that the PHA has funding available under its annual contributions contract (ACC) [24 CFR 982.355(d)(1), Notice PIH 2016-09].

If the receiving PHA absorbs a family from the point of admission, the admission will be counted against the income targeting obligation of the receiving PHA [24 CFR 982.201(b)(2)(vii)].

If the receiving PHA absorbs a family after providing assistance for the family under a billing arrangement with the initial PHA, the receiving PHA must send an updated form HUD-52665 to the initial PHA no later than 10 business days following the effective date of the termination of the billing arrangement [Notice PIH 2016-09].

PHA Policy

If the PHA decides to absorb a portable family upon the execution of a HAP contract on behalf of the family, the PHA will notify the initial PHA by the initial billing deadline specified on form HUD-52665. The effective date of the HAP contract will be the effective date of the absorption.

If the PHA decides to absorb a family after that, it will provide the initial PHA with 30 days' advance notice, but no later than 10 business days following the effective date of the termination of the billing arrangement.

Following the absorption of an incoming portable family, the family is assisted with funds available under the consolidated ACC for the receiving PHA's voucher program [24 CFR 982.355(d)], and the receiving PHA becomes the initial PHA in any subsequent moves by the family under portability [24 CFR 982.355(e)(4)].

Chapter 11.A.

REEXAMINATIONS

INTRODUCTION

This chapter is applicable until the PHA's HOTMA 102/104 compliance date. After this date, the PHA will follow policies as outlined in Chapter 11.B. of the model policy.

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan. .

The PHA is required to reexamine each family's income and composition at least annually, and to adjust the family's level of assistance accordingly. Interim reexaminations are also needed in certain situations. This chapter discusses both annual and interim reexaminations, and the recalculation of family share and subsidy that occurs as a result. HUD regulations and PHA policies concerning reexaminations are presented in three parts:

Part I: Annual Reexaminations. This part discusses the process for conducting annual reexaminations.

Part II: Interim Reexaminations. This part details the requirements for families to report changes in family income and composition between annual reexaminations.

Part III: Recalculating Family Share and Subsidy Amount. This part discusses the recalculation of family share and subsidy amounts based on the results of annual and interim reexaminations.

Policies governing reasonable accommodation, family privacy, required family cooperation, and program abuse, as described elsewhere in this plan, apply to both annual and interim reexaminations.

PART I: ANNUAL REEXAMINATIONS [24 CFR 982.516]

11-I.A. OVERVIEW

The PHA must conduct a reexamination of family income and composition at least annually. This includes gathering and verifying current information about family composition, income, and expenses. Based on this updated information, the family's income and rent must be recalculated. This part discusses the schedule for annual reexaminations, the information to be collected and verified, and annual reexamination effective dates.

11-I.B. STREAMLINED ANNUAL REEXAMINATIONS [24 CFR 982.516(b); New HCV GB, Reexaminations]

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 rate of interest. The PHA may, however, obtain third-party verification of all income, regardless of the source. Further, upon request of the family, the PHA must perform third-party verification of all income sources.

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. If at least 90 percent of the family's income is from fixed sources, the PHA may streamline the verification of fixed income but is not required to verify non-fixed income amounts. If the family receives less than 90 percent of its income from fixed sources, the PHA may streamline the verification of fixed income and must verify non-fixed income annually.

PHA Policy

The PHA will streamline the annual reexamination process by applying the verified COLA or interest rate to fixed-income sources. The PHA will document in the file how the determination that a source of income was fixed was made.

If a family member with a fixed source of income is added, the PHA will use third-party verification of all income amounts for that family member.

If verification of the COLA or rate of interest is not available, the PHA will obtain third-party verification of income amounts.

Third-party verification of fixed sources of income will be obtained during the intake process and at least once every three years thereafter.

Third-party verification of non-fixed income will be obtained annually regardless of the percentage of family income received from fixed sources.

11-I.B. SCHEDULING ANNUAL REEXAMINATIONS

The PHA must establish a policy to ensure that the annual reexamination for each family is completed *within* a 12-month period, and may require reexaminations more frequently [HCV GB p. 12-1].

PHA Policy

The PHA will begin the annual reexamination process 120 days in advance of its scheduled effective date. Generally, the PHA will schedule annual reexamination effective dates to coincide with the family's anniversary date.

Anniversary date is defined as 12 months from the effective date of the family's last annual reexamination or, during a family's first year in the program, from the effective date of the family's initial examination (admission).

If the family moves to a new unit, the PHA will perform a new annual reexamination.

The PHA also may schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.

Notification of and Participation in the Annual Reexamination Process

The PHA is required to obtain the information needed to conduct annual reexaminations. How that information will be collected is left to the discretion of the PHA. However, PHAs should give tenants who were not provided the opportunity the option to complete Form HUD-92006 at this time [Notice PIH 2009-36].

PHA Policy

Families are required to complete annual reexamination in the PHA's web portal. Two notices will be sent to the family advising that the family is required to participate in the annual reexamination.

If a family does not complete the annual recertification in the portal within the specified time frame the PHA will send a second notification with a new due date.

If the family does not complete the reexamination in the portal in its entirety after the second notification deadline, the family will be scheduled for a final interview appointment in person.

Families ~~are~~ required to participate in an annual reexamination interview, which must be attended by ~~the head of household, spouse, or co-head~~ all adult household members 18 years of age and older. If participation in an in-person interview poses a hardship because of a family member's disability, the family should contact the PHA to request reasonable accommodation (see Chapter 2).

Notification of the annual reexamination in-person interviews will be sent by first-class mail as well as by email and will contain the date, time, and location of the interview. In addition, it will inform the family of the information and documentation that must be brought to the interview.

If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. If a family fails to attend ~~two~~ the final scheduled interviews without PHA approval, or if the notice is returned by the

post office with no forwarding address, a notice of termination (see Chapter 12) will be sent to the family's address of record, and to any alternate address provided in the family's file.

An advocate, interpreter, or other assistant may assist the family in the interview process. The family and the PHA must execute a certification attesting to the role and the assistance provided by any third party.

PHA Policy

Annual reexaminations may also be conducted by mail as a reasonable accommodation. Notification of the annual reexamination will be sent by first-class mail and will inform the family of the information and documentation that must be provided by the PHA, and the deadline for providing it. Documents will be accepted by mail, by email, by fax, or in person.

The PHA will, however, conduct reexaminations in person if requested as a reasonable accommodation or by LEP persons. Reasonable accommodation requests will be handled in accordance with the policies in Chapter 2. Further, an in-person interview will be scheduled if the family requests assistance in providing information or documentation requested by the PHA or if the required paperwork is not returned timely, or if it is returned timely but is not complete.

If the reexamination notice is returned by the post office with no forwarding address, a notice of termination (see Chapter 12) will be sent to the family's address of record, as well as to any alternate address provided in the family's file.

11-I.C. CONDUCTING ANNUAL REEXAMINATIONS

As part of the annual reexamination process, families are required to provide updated information to the PHA regarding the family's income, expenses, and composition [24 CFR 982.551(b)].

PHA Policy

Families will be asked to bring all required information (as described in the reexamination notice) to the reexamination appointment. The required information will include a PHA-designated reexamination form, an Authorization for the Release of Information/Privacy Act Notice, as well as supporting documents or forms related to the family's income, expenses, and family composition.

Any required documents or information that the family is unable to provide at the time of the interview must be provided within 10 business days of the interview. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.

If the family requests or the PHA schedules an in-person interview, families will be asked to bring all required information (as described in the reexamination notice) to the reexamination appointment.

Any required documents or information that the family is unable to provide at the time of the interview must be provided within 10 business days of the interview. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.

If the family does not provide the required documents or information within the required time period (plus any extensions), the family will be sent a notice of termination (see Chapter 12).

Additionally, HUD recommends that at annual reexaminations PHAs ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state [Notice PIH 2012-28].

PHA Policy

At the **initial move, when adding an adult to the household and/or** annual reexamination, the PHA will ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state. The PHA will use the Dru Sjodin National Sex Offender database to verify the information provided by the tenant.

If the PHA proposes to terminate assistance based on lifetime sex offender registration information, the PHA must notify the household of the proposed action and must provide the subject of the record and the tenant a copy of the record and an opportunity to dispute the accuracy and relevance of the information prior to termination. [24 CFR 5.903(f) and 5.905(d)]. (See Chapter 12).

The information provided by the family generally must be verified in accordance with the policies in Chapter 7. Unless the family reports a change, or the PHA has reason to believe a change has occurred in information previously reported by the family, certain types of information that are verified at admission typically do not need to be re-verified on an annual basis. These include:

- Legal identity
- Age
- Social security numbers
- A person's disability status
- Citizenship or immigration status

If adding a new family member to the unit causes overcrowding according ~~to the housing quality standards (HQS)~~ **space standards** (see Chapter 8), the PHA must issue the family a new voucher, and the family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, the PHA must terminate the HAP contract in accordance with its terms [24 CFR 982.403].

11-I.~~ED~~. DETERMINING ONGOING ELIGIBILITY OF CERTAIN STUDENTS [24 CFR 982.552(b)(5)]

Section 327 of Public Law 109-115 established new restrictions on the ongoing eligibility of certain students (both part- and full-time) who are enrolled in institutions of higher education.

If a student enrolled in an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the student's eligibility must be reexamined along with the income eligibility of the student's parents on an annual basis. In these cases, both the student and the student's parents must be income eligible for the student to continue to receive HCV assistance. If, however, a student in these circumstances is determined independent from his or her parents or is considered a *vulnerable youth* in accordance with PHA policy, the income of the student's parents will not be considered in determining the student's ongoing eligibility.

Students who reside with parents in an HCV assisted unit are not subject to this provision. It is limited to students who are receiving assistance on their own, separately from their parents.

PHA Policy

During the annual reexamination process, the PHA will determine the ongoing eligibility of each student who is subject to the eligibility restrictions in 24 CFR 5.612 by reviewing the student's individual income as well as the income of the student's parents. If the student has been determined "independent" from his/her parents or is considered a *vulnerable youth* based on the policies in Sections 3-II.E and 7-II.E, the parents' income will not be reviewed.

If the student is no longer income eligible based on his/her own income or the income of his/her parents, the student's assistance will be terminated in accordance with the policies in Section 12-I.D.

If the student continues to be income eligible based on his/her own income and the income of his/her parents (if applicable), the PHA will process a reexamination in accordance with the policies in this chapter.

11-I.F. EFFECTIVE DATES

The PHA must establish policies concerning the effective date of changes that result from an annual reexamination [24 CFR 982.516].

PHA Policy

In general, an *increase* in the family share of the rent that results from an annual reexamination will take effect on the family's anniversary date, and the family will be notified at least 30 days in advance.

If less than 30 days remain before the scheduled effective date, the increase will take effect on the first of the month following the end of the 30-day notice period.

If a family moves to a new unit, the increase will take effect on the effective date of the new lease and HAP contract, and no 30-day notice is required.

If the PHA chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by the PHA, but will always allow for the 30-day notice period.

If the family causes a delay in processing the annual reexamination, *increases* in the family share of the rent will be applied retroactively to the scheduled effective date of the annual reexamination. The family will be responsible for any overpaid subsidy and may be offered a repayment agreement in accordance with the policies in Chapter 16.

In general, a *decrease* in the family share of the rent that results from an annual reexamination will take effect on the family's anniversary date.

If a family moves to a new unit, the decrease will take effect on the effective date of the new lease and HAP contract.

If the PHA chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by the PHA.

If the family causes a delay in processing the annual reexamination, *decreases* in the family share of the rent will be applied prospectively, from the first day of the month following completion of the reexamination processing.

Delays in reexamination processing are considered to be caused by the family if the family fails to provide information requested by the PHA by the date specified, and this delay prevents the PHA from completing the reexamination as scheduled.

PART II: INTERIM REEXAMINATIONS [24 CFR 982.516]

11-II.A. OVERVIEW

Family circumstances may change between annual reexaminations. HUD and PHA policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances the PHA must process interim reexaminations to reflect those changes. HUD regulations also permit the PHA to conduct interim reexaminations of income or family composition at any time. When an interim reexamination is conducted, only those factors that have changed are verified and adjusted [HCV GB, p. 12-10].

In addition to specifying what information the family must report, HUD regulations permit the family to request an interim determination if other aspects of the family's income or composition changes. The PHA must complete the interim reexamination within a reasonable time after the family's request.

This part includes HUD and PHA policies describing what changes families are required to report, what changes families may choose to report, and how the PHA will process both PHA- and family-initiated interim reexaminations.

11-II.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION

The family is required to report all changes in family composition. The PHA must adopt policies prescribing when and under what conditions the family must report changes in income and family composition. However, due to family obligations under the program, the PHA has limited discretion in this area.

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.

The PHA will conduct interim reexaminations to account for any changes in household composition that occur between annual reexaminations.

New Family Members Not Requiring PHA Approval

The addition of a family member as a result of birth, adoption, or court-awarded custody does not require PHA approval. However, the family is required to promptly notify the PHA of the addition [24 CFR 982.551(h)(2)].

PHA Policy

The family must inform the PHA of the birth, adoption, or court-awarded custody of a child within 10 business days.

New Family and Household Members Requiring Approval

With the exception of children who join the family as a result of birth, adoption, or court-awarded custody, a family must request PHA approval to add a new family member [24 CFR 982.551(h)(2)] or other household member (live-in aide or foster child) [24 CFR 982.551(h)(4)].

Although the PHA must verify aspects of program eligibility when any new family member is added, the Streamlining Final Rule removed the requirement that PHAs conduct a reexamination of income whenever a new family member is added. The PHA may state in policy that an income reexamination will be conducted.

If a change in family size causes a violation of Housing Quality Standards (HQS) space standards (see Chapter 8), the PHA must issue the family a new voucher, and the family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, the PHA must terminate the family's HAP contract in accordance with its terms [24 CFR 982.403].

PHA Policy

Families must request PHA approval to add a new family member, live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 30 consecutive days or 90 cumulative days within a 12-month period and therefore no longer qualifies as a "guest." Requests must be made in writing and approved by the PHA prior to the individual moving into the unit.

The PHA will not approve the addition of a new family or household member unless the individual meets the PHA's eligibility criteria (see Chapter 3) and documentation requirements (see Chapter 7, Part II).

The PHA will not approve the addition of a foster child or foster adult if it will cause a violation of **HQS** space standards.

If the PHA determines an individual meets the PHA's eligibility criteria and documentation requirements, the PHA will provide written approval to the family. If the approval of a new family member or live-in aide will cause overcrowding according to **HQS** standards, the approval letter will explain that the family will be issued a voucher and will be required to move.

If the PHA determines that an individual does not meet the PHA's eligibility criteria or documentation requirements, the PHA will notify the family in writing of its decision to deny approval of the new family or household member and the reasons for the denial.

The PHA will make its determination within 10 business days of receiving all information required to verify the individual's eligibility.

Departure of a Family or Household Member

Families must promptly notify the PHA if any family member no longer lives in the unit [24 CFR 982.551(h)(3)]. Because household members are considered when determining the family unit (voucher) size [24 CFR 982.402], the PHA also needs to know when any live-in aide, foster child, or foster adult ceases to reside in the unit. **The PHA must process an interim for all decreased in adjusted income when a family member permanently moves out of the unit.**

PHA Policy

If a household member ceases to reside in the unit, the family must inform the PHA within 10 business days. This requirement also applies to a family member who has been considered temporarily absent at the point that the family concludes the individual is permanently absent.

Changes in Family Unit Size (Voucher Size) [24 CFR 982.505(c)(6)]

Changes effective 12/2/24 and earlier: Irrespective of any increase or decrease in the payment standard, if the family unit size increases or decreases during the HAP contract term, the new family unit size must be used to determine the payment standard for the family beginning at the family's first regular reexamination following the change in family unit size.

Changes effective 12/3/24 and later: Irrespective of any increase or decrease in the payment standard, if the family unit size increases or decreases during the HAP contract term, the new family unit size may be used to determine the payment standard immediately or 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

Overview

Interim reexaminations can 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. When a family reports a change, the PHA may take different actions depending on whether the family reported the change voluntarily, or because it was required to do so.

PHA-Initiated Interim Reexaminations

PHA-initiated interim reexaminations are those that are scheduled based on circumstances or criteria defined by the PHA. They are not scheduled because of changes reported by the family.

PHA Policy

The PHA will conduct interim reexaminations in each of the following instances:

For families receiving the Earned Income Disallowance (EID), the PHA will conduct an interim reexamination at the start and conclusion of the 24-month eligibility period.

If the family has reported zero income, the PHA will conduct an interim reexamination every 3 months as long as the family continues to report that they have no income.

If at the time of the annual reexamination, it is not feasible to anticipate a level of income for the next 12 months (e.g. seasonal or cyclic income), the PHA will schedule an interim reexamination to coincide with the end of the period for which it is feasible to project income.

If at the time of the annual reexamination, tenant declarations were used on a provisional basis due to the lack of third-party verification, and third-party verification becomes available, the PHA will conduct an interim reexamination.

The PHA may conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a tenant fraud complaint.

Interim Increases [24 CFR 982.516(c)(3) and Notice PIH 2023-27]

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:

- PHA's 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

When a family reports an increase in their earned income between annual reexaminations, the PHA will not conduct an interim reexamination, regardless of the amount of the increase, and regardless of whether there was a previous decrease since the family's last annual reexamination.

The PHA will process an interim reexamination for any increases in unearned income of 10

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 accordance with the PHA policies in Chapter 14.

Concurrent Increases in Earned and Unearned Income [Notice PIH 2023-27]

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 increase independently meets the 10 percent threshold and all other requirements for performing interim reexamination. 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 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 2023-2027)

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 w/ PHA policy.

Family-Initiated Interim Reexaminations

Family Reporting

The PHA must adopt policies prescribing when and under what conditions the family must report changes in family income or expenses [24 CFR 982.516(c)]. In addition, HUD regulations require that the family be permitted to obtain an interim reexamination any time the family has experienced a change in circumstances since the last determination [24 CFR 982.516(b)(2)].

~~In addition, HUD regulations require that the family be permitted to obtain an interim reexamination any time the family has experienced a change in circumstances since the last determination [24 CFR 982.516(b)(2)].~~

Required Reporting

HUD regulations give the PHA the freedom to determine the circumstances under which families will be required to report changes affecting income.

PHA Policy

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 occurred 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 orally or in writing. If the family provides oral notice, the PHA may also require the family to submit the changes in writing.

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 reexamination. The PHA will send the family a written notification 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 notice with PHA approval. The PHA will accept required documentation by mail, email, fax 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.

7

Optional Reporting

The family may request an interim reexamination any time the family has experienced a change in circumstances since the last determination [24 CFR 982.516(b)(2)]. The PHA must process the request if the family reports a change that will result in a reduced family income [HCV GB, p. 12-9].

If a family reports a decrease in income from the loss of welfare benefits due to fraud or non-compliance with a welfare agency requirement to participate in an economic self-sufficiency program, the family's share of the rent will not be reduced [24 CFR 5.615]. For more information regarding the requirement to impute welfare income see Chapter 6.

PHA Policy

If a family reports a change that it was not required to report and that would result in an increase in the family share of the rent, the PHA will note the information in the tenant file but will not conduct an interim reexamination.

If a family reports a change that it was not required to report and that would result in a decrease in the family share of rent, the PHA will conduct an interim reexamination. See Section 11-II.D. for effective dates.

Families may report changes in income or expenses at any time.

11-II.D. PROCESSING THE INTERIM REEXAMINATION

Method of Reporting

PHA Policy

The family may notify the PHA of changes either orally or in writing. If the family provides oral notice, the PHA may also require the family to submit the changes in writing.

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.

Based on the type of change reported, the PHA will determine the documentation the family will be required to submit. 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, by email, by fax, or in person.

Effective Dates

The PHA must establish the time frames in which any changes that result from an interim reexamination will take effect [24 CFR 982.516(d)]. The changes may be applied either retroactively or prospectively, depending on whether there is to be an increase or a decrease in the family share of the rent, and whether the family reported any required information within the required time frames [HCV GB, p. 12-10].

II – II.D. EFFECTIVE DATES [24 CFR 982.516(e) and Notice 2023-27]

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 on 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.

Changes Not 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 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 retrospective 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.

PHA Policy

If the family share of the rent is to *increase*:

The increase generally will be effective on the first of the month following 30 days' notice to the family.

If a family fails to report a change within the required time frames, or fails to provide all required information within the required time frames, the increase will be applied retroactively, to the date it would have been effective had the information been provided on a timely basis. The family will be responsible for any overpaid subsidy and may be offered a repayment agreement in accordance with the policies in Chapter 16.

If the family share of the rent is to *decrease*:

The decrease will be effective on the first day of the month following the month in which the change was reported and all required documentation was submitted. In cases where the change cannot be verified until after the date the change would have become effective, the change will be made retroactively.

PART III: RECALCULATING FAMILY SHARE AND SUBSIDY AMOUNT

11-III.A. OVERVIEW

After gathering and verifying required information for an annual or interim reexamination, the PHA must recalculate the family share of the rent and the subsidy amount and notify the family and owner of the changes [24 CFR 982.516(d)(2), HCV 12-6 and 12-10]. While the basic policies that govern these calculations are provided in Chapter 6, this part lays out policies that affect these calculations during a reexamination.

11-III.B. CHANGES IN PAYMENT STANDARDS AND UTILITY ALLOWANCES

In order to calculate the family share of the rent and HAP amount correctly, changes in payment standards, subsidy standards, or utility allowances may need to be updated and included in the PHA's calculations.

Specific policies governing how subsidy standards, payment standards, and utility allowances are applied are discussed below.

Payment Standards [24 CFR 982.505 and FR Notice 5/7/24]

The family share of the rent and HAP calculations must use the correct payment standard for the family, taking into consideration the family unit size, the size of unit, and the area in which the unit is located [HCV GB, p. 12-5]. See Chapter 6 for information on how to select the appropriate payment standard when the PHA changes its payment standard or when there is a change in family composition.

Subsidy Standards [24 CFR 982.505(c)(4)]

If there is a change in the family unit size that would apply to a family during the HAP contract term, either due to a change in family composition, or a change in the PHA's subsidy standards (see Chapter 5), the new family unit size must be used to determine the payment standard amount for the family immediately or at the family's *first annual* reexamination following the change in family unit size.

Utility Allowances [24 CFR 982.517(d)]

The family share of the rent and HAP calculations must reflect any changes in the family's utility arrangement with the owner, or in the PHA's utility allowance schedule [HCV GB, p. 12-5]. Chapter 16 discusses how utility allowance schedules are established.

When there are changes in the utility arrangement with the owner, the PHA must use the utility allowances in effect at the time the new lease and HAP contract are executed.

At reexamination, the PHA must use the PHA current utility allowance schedule [HCV GB, p. 18-8].

PHA Policy

Revised utility allowances will be applied to a family's rent and subsidy calculations at the first annual reexamination after the allowance is adopted.

11-III.C. NOTIFICATION OF NEW FAMILY SHARE AND HAP AMOUNT

The PHA must notify the owner and family of any changes in the amount of the HAP payment [HUD-52641, HAP Contract]. The notice must include the following information [HCV GB, p. 12-6]:

- The amount and effective date of the new HAP payment
- The amount and effective date of the new family share of the rent
- The amount and effective date of the new tenant rent to owner

The family must be given an opportunity for an informal hearing regarding the PHA's determination of their annual or adjusted income, and the use of such income to compute the housing assistance payment [24 CFR 982.555(a)(1)(i)] (see Chapter 16).

PHA Policy

The notice to the family will include the annual and adjusted income amounts that were used to calculate the family share of the rent and the housing assistance payment.

The notice will state the family has the right to request an explanation of how the assistance was calculated and if the family disagrees, they have the right to informal hearing. The notice will include the procedures for requesting an informal hearing.

11-III.D. DISCREPANCIES

During an annual or interim reexamination, the PHA may discover that information previously reported by the family was in error, or that the family intentionally misrepresented information. In addition, the PHA may discover errors made by the PHA. When errors resulting in the overpayment or underpayment of subsidy are discovered, corrections will be made in accordance with the policies in Chapter 13.

Chapter 11.B.

REEXAMINATIONS UNDER HOTMA 102/104

INTRODUCTION

~~This chapter is applicable upon the PHA's HOTMA 102/104 compliance date. Prior to this date, the PHA will follow policies as outlined in Chapter 11.A. of the model policy.~~

~~This chapter is applicable upon the PHA's HOTMA 102/104 compliance date. Prior to this date, the PHA will follow policies as outlined in Chapter 11.A. of the model policy.~~

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

The PHA is required to reexamine each family's income and composition at least annually, and to adjust the family's level of assistance accordingly. Interim reexaminations are also needed in certain situations. This chapter discusses both annual and interim reexaminations, and the recalculation of family share and subsidy that occurs as a result. HUD regulations and PHA policies concerning reexaminations are presented in three parts:

Part I: Annual Reexaminations. This part discusses the process for conducting annual reexaminations.

Part II: Interim Reexaminations. This part details the requirements for families to report changes in family income and composition between annual reexaminations.

Part III: Recalculating Family Share and Subsidy Amount. This part discusses the recalculation of family share and subsidy amounts based on the results of annual and interim reexaminations.

Part IV: Non-Interim Reexamination Transaction. This part describes transactions that do not entail changes to the family's adjusted income.

Policies governing reasonable accommodation, family privacy, required family cooperation, and program abuse, as described elsewhere in this plan, apply to both annual and interim reexaminations.

PART I: ANNUAL REEXAMINATIONS [24 CFR 982.516]

11-I.A. OVERVIEW

The PHA must conduct a reexamination of family income and composition at least annually. This includes gathering and verifying current information about family composition, income, and expenses. Based on this updated information, the family's income and rent must be recalculated. This part discusses the schedule for annual reexaminations, the information to be collected and verified, and annual reexamination effective dates.

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.B. SCHEDULING ANNUAL REEXAMINATIONS

The PHA must establish a policy to ensure that the annual reexamination for each family is completed *within* a 12-month period and may require reexaminations more frequently [HCV GB p. 12-1].

PHA Policy

The PHA will begin the annual reexamination process 120 days in advance of its scheduled effective date. Generally, the PHA will schedule annual reexamination effective dates to coincide with the family's anniversary date.

Anniversary date is defined as 12 months from the effective date of the family's last annual reexamination or, during a family's first year in the program, from the effective date of the family's initial examination (admission).

If the family moves to a new unit, the PHA will perform a new annual reexamination.

The PHA also may schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.

Notification of and Participation in the Annual Reexamination Process

The PHA is required to obtain the information needed to conduct annual reexaminations. How that information will be collected is left to the discretion of the PHA. However, PHAs should give tenants who were not provided the opportunity the option to complete Form HUD-92006 at this time [Notice PIH 2009-36].

PHA Policy

Families generally are required to participate in an annual reexamination interview, which must be attended by the head of household, spouse, or cohead. If participation in an in-person interview poses a hardship because of a family member's disability, the family should contact the PHA to request a reasonable accommodation (see Chapter 2).

Notification of annual reexamination interviews will be sent by first-class mail and will contain the date, time, and location of the interview. In addition, it will inform the family of the information and documentation that must be brought to the interview.

If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. If a family does not attend the scheduled interview, the PHA will send a second notification with a new interview date and appointment time.

If a family fails to attend two scheduled interviews without PHA approval, or if the notice is returned by the post office with no forwarding address, a notice of termination (see Chapter 12) will be sent to the family's address of record, and to any alternate address provided in the family's file.

An advocate, interpreter, or other assistant may assist the family in the interview process. The family and the PHA must execute a certification attesting to the role and the assistance provided by any such third party.

11-I.C. CONDUCTING ANNUAL REEXAMINATIONS

As part of the annual reexamination process, families are required to provide updated information to the PHA regarding the family's income, expenses, and composition [24 CFR 982.551(b)].

PHA Policy

Families will be asked to bring all required information (as described in the reexamination notice) to the reexamination appointment. The required information will include a PHA-designated reexamination form as well as supporting documents or forms related to the family's income, expenses, and family composition.

Any required documents or information that the family is unable to provide at the time of the interview must be provided within 10 business days of the interview. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.

If the family does not provide the required documents or information within the required time period (plus any extensions), the family will be sent a notice of termination (See Chapter 12).

Additionally, HUD recommends that at annual reexaminations PHAs ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state [Notice PIH 2012-28].

PHA Policy

At the annual reexamination, the PHA will ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state. The PHA will use the Dru Sjodin National Sex Offender database to verify the information provided by the tenant.

If the PHA proposes to terminate assistance based on lifetime sex offender registration information, the PHA must notify the household of the proposed action and must provide the subject of the record and the tenant a copy of the record and an opportunity to dispute the accuracy and relevance of the information prior to termination. [24 CFR 5.903(f) and 5.905(d)]. (See Chapter 12.)

The information provided by the family generally must be verified in accordance with the policies in Chapter 7. Unless the family reports a change, or the PHA has reason to believe a change has occurred in information previously reported by the family, certain types of information that are verified at admission typically do not need to be re-verified on an annual basis. These include:

- Legal identity
- Age
- Social security numbers
- A person's disability status
- Citizenship or immigration status

If adding a new family member to the unit causes overcrowding according to space standards (see Chapter 8), the PHA must issue the family a new voucher, and the family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, the PHA must terminate the HAP contract in accordance with its terms [24 CFR 982.403].

11-I.D. DETERMINING ONGOING ELIGIBILITY OF CERTAIN STUDENTS [24 CFR 982.552(b)(5)]

Section 327 of Public Law 109-115 established restrictions on the ongoing eligibility of certain students (both part- and full-time) who are enrolled in institutions of higher education.

If a student enrolled in an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the student's eligibility must be reexamined along with the income eligibility of the student's parents on an annual basis. In these cases, both the student and the student's parents must be income eligible for the student to continue to receive HCV assistance. If, however, a student in these circumstances is determined independent from their parents or is considered a *vulnerable youth* in accordance with PHA policy, the income of the student's parents will not be considered in determining the student's ongoing eligibility. Students who reside with parents in an HCV assisted unit are not subject to this provision. It is limited to students who are receiving assistance on their own, separately from their parents.

PHA Policy

During the annual reexamination process, the PHA will determine the ongoing eligibility of each student who is subject to the eligibility restrictions in 24 CFR 5.612 by reviewing the student's individual income as well as the income of the student's parents. If the student has been determined "independent" from their parents or is considered a *vulnerable youth* based on the policies in Sections 3-II.E and 7-II.E, the parents' income will not be reviewed.

If the student is no longer income eligible based on their own income or the income of their parents, the student's assistance will be terminated in accordance with the policies in Section 12-I.D.

If the student continues to be income eligible based on their own income and the income of their parents (if applicable), the PHA will process a reexamination in accordance with the policies in this chapter.

11-I.E. CALCULATING ANNUAL INCOME AT ANNUAL REEXAMINATION

[24 CFR 5.609(c)(2) and Notice PIH 2023-27]

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.

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 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.

PHA Policy

When income is calculated using a streamlined income determination or Safe Harbor determination from a means-tested federal public assistance program in accordance with PHA policies in Chapter 7, the above is not applicable. However, where the family disagrees with the PHA or other agency's determination of income or the PHA has other reason to use third-party verification in these circumstances, then the above will apply.

11-I.F. EFFECTIVE DATES

The PHA must establish policies concerning the effective date of changes that result from an annual reexamination [24 CFR 982.516].

PHA Policy

In general, an *increase* in the family share of the rent that results from an annual reexamination will take effect on the family's anniversary date, and the family will be notified at least 30 days in advance.

If less than 30 days remain before the scheduled effective date, the increase will take effect on the first of the month following the end of the 30-day notice period.

If a family moves to a new unit, the increase will take effect on the effective date of the new lease and HAP contract, and no 30-day notice is required.

If the PHA chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by the PHA, but will always allow for the 30-day notice period.

If the family causes a delay in processing the annual reexamination, *increases* in the family share of the rent will be applied retroactively to the scheduled effective date of the annual reexamination. The family will be responsible for any overpaid subsidy and may be offered a repayment agreement in accordance with the policies in Chapter 16.

In general, a *decrease* in the family share of the rent that results from an annual reexamination will take effect on the family's anniversary date.

If a family moves to a new unit, the decrease will take effect on the effective date of the new lease and HAP contract.

If the PHA chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by the PHA.

If the family causes a delay in processing the annual reexamination, *decreases* in the family share of the rent will be applied prospectively from the first day of the month following completion of the reexamination processing.

Delays in reexamination processing are considered to be caused by the family if the family fails to provide information requested by the PHA by the date specified, and this delay prevents the PHA from completing the reexamination as scheduled.

PART II: INTERIM REEXAMINATIONS [24 CFR 982.516; Notice PIH 2023-27]

11-II.A. OVERVIEW

Family circumstances may change between annual reexaminations. HUD and PHA policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances the PHA must process interim reexaminations to reflect those changes. 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 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.

11-II.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION

Reporting

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.

New Family Members Not Requiring PHA Approval

The addition of a family member as a result of birth, adoption, or court-awarded custody does not require PHA approval. However, the family is required to promptly notify the PHA of the addition [24 CFR 982.551(h)(2)].

New Family and Household Members Requiring Approval

With the exception of children who join the family as a result of **birth, adoption, or court-awarded custody**, a family must request PHA approval to add a new family member [24 CFR 982.551(h)(2)] or other household member (live-in aide or foster child) [24 CFR 982.551(h)(4)]. Although the PHA must verify aspects of program eligibility when any new family member is added, the Streamlining Final Rule removed the requirement that PHAs conduct a reexamination of income whenever a new family member is added. The PHA may state in policy that an income reexamination will be conducted.

If a change in family size causes a violation of space standards (see Chapter 8), the PHA must issue the family a new voucher, and the family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, the PHA must terminate the family's HAP contract in accordance with its terms [24 CFR 982.403].

PHA Policy

Families must request PHA approval to add a new family member (other than due to birth, adoption, or court-awarded custody), live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 30 consecutive days or 90 cumulative days within a 12-month period and therefore no longer qualifies as a "guest." Requests must be made in writing and approved by the PHA prior to the individual moving into the unit.

The PHA will not approve the addition of a new family or household member unless the individual meets the PHA's eligibility criteria (see Chapter 3) and documentation requirements (see Chapter 7, Part II).

The PHA will not approve the addition of a foster child or foster adult if it will cause a violation of space standards.

If the PHA determines an individual meets the PHA's eligibility criteria and documentation requirements, the PHA will provide written approval to the family. If the approval of a new family member or live-in aide will cause overcrowding according to space standards, the approval letter will explain that the family will be issued a voucher and will be required to move.

If the PHA determines that an individual does not meet the PHA's eligibility criteria or documentation requirements, the PHA will notify the family in writing of its decision to deny approval of the new family or household member and the reasons for the denial. The PHA will make its determination within 10 business days of receiving all information required to verify the individual's eligibility.

Departure of a Family or Household Member

Families must promptly notify the PHA if any household member no longer lives in the unit [24 CFR 982.551(h)(3)]. Because household members are considered when determining the family unit (voucher) size [24 CFR 982.402], the PHA also needs to know when any live-in aide, foster child, or foster adult ceases to reside in the unit. The PHA must process an interim for all decreases in adjusted income when a family member permanently moves out of the unit.

PHA Policy

If a household member ceases to reside in the unit, the family must inform the PHA within 10 business days. This requirement also applies to a family member who has been considered temporarily absent at the point that the family concludes the individual is permanently absent.

Changes in Family Unit Size (Voucher Size) [24 CFR 982.505(c)(6)]

Changes effective 12/2/24 and earlier: Irrespective of any increase or decrease in the payment standard, if the family unit size increases or decreases during the HAP contract term, the new family unit size must be used to determine the payment standard for the family beginning at the family's first regular reexamination following the change in family unit size.

Changes effective 12/3/24 and later: Irrespective of any increase or decrease in the payment standard, if the family unit size increases or decreases during the HAP contract term, the new family unit size may be used to determine the payment standard immediately or 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

Overview

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]

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. 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.

However, while the PHA has some discretion, HUD requires that the PHA perform an interim reexamination for a decrease in adjusted income of any amount in two circumstances:

- When there is a decrease in family size attributed to the death of a family member; or
- When a family member permanently moves out of the assisted unit during the period since the family's last reexamination.

In the above circumstances, the PHA must perform an interim reexamination for any decrease in adjusted income.

If the net effect of the changes in adjusted income due to a decrease in family size results in no change or an increase in annual adjusted income, then PHA must process the removal of the household member(s) as a non-interim reexamination transaction without making changes to the family's annual adjusted income.

PHA Policy

The PHA will conduct an interim reexamination any time the family's adjusted income has decreased by any amount.

Interim Increases [24 CFR 982.516(c)(3) and Notice PIH 2023-27]

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

When a family reports an increase in their earned income between annual reexaminations, the PHA will not conduct an interim reexamination, regardless of the amount of the increase, and regardless of whether there was a previous decrease since the family's last annual reexamination.

The PHA will process an interim reexamination for any increases in unearned income of 10 percent or more in adjusted income.

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 14.

Concurrent Increases in Earned and Unearned Income [Notice PIH 2023-27]

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 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]

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

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

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 occurred 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 orally or in writing, **including email**. If the family provides oral notice, the PHA may also require the family to submit the changes in writing, **including email**.

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 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 [24 CFR 982.516(e) and Notice 2023-27]

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.

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.

PHA Policy

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 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~~ ~~increases~~ 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: RECALCULATING FAMILY SHARE AND SUBSIDY AMOUNT

11-III.A. OVERVIEW

After gathering and verifying required information for an annual or interim reexamination, the PHA must recalculate the family share of the rent and the subsidy amount and notify the family and owner of the changes [24 CFR 982.516(d)(2), HCV 12-6 and 12-10]. While the basic policies that govern these calculations are provided in Chapter 6, this part lays out policies that affect these calculations during a reexamination.

11-III.B. CHANGES IN PAYMENT STANDARDS AND UTILITY ALLOWANCES

In order to calculate the family share of the rent and HAP amount correctly, changes in payment standards, subsidy standards, or utility allowances may need to be updated and included in the PHA's calculations.

Specific policies governing how subsidy standards, payment standards, and utility allowances are applied are discussed below.

Payment Standards [24 CFR 982.505 and FR Notice 5/7/24]

The family share of the rent and HAP calculations must use the correct payment standard for the family, taking into consideration the family unit size, the size of unit, and the area in which the unit is located [HCV GB, p. 12-5]. See Chapter 6 for information on how to select the appropriate payment standard **when the PHA changes its payment standard or when there is a change in family composition.**

~~The family share of the rent and HAP calculations must use the correct payment standard for the family, taking into consideration the family unit size, the size of unit, and the area in which the unit is located [HCV GB, p. 12-5]. See Chapter 6 for information on how to select the appropriate payment standard.~~

~~When the PHA changes its payment standards or the family's situation changes, new payment standards are applied at the following times:~~

- ~~• If the PHA's payment standard amount changes during the term of the HAP contract, the date on which the new standard is applied depends on whether the standard has increased or decreased:
 - ~~— If the payment standard amount has increased, the increased payment standard will be applied at the first annual reexamination following the effective date of the increase in the payment standard.~~
 - ~~— If the payment standard amount has decreased, during the term of a HAP contract, the PHA is not required to reduce the payment standard as the HAP contract remains in effect. At the family's second annual reexamination, the PHA may, but is not required to, apply the decreased payment standard or may gradually implement the reduced payment standard (See Chapter 6 for the PHA's policy on decreases in the payment standard).~~~~
- ~~• If the family moves to a new unit, or a new HAP contract is executed due to changes in the lease (even if the family remains in place) the current payment standard applicable to the family will be used when the new HAP contract is processed.~~

Subsidy Standards [24 CFR 982.505(c)(4)]

If there is a change in the family unit size that would apply to a family during the HAP contract term, either due to a change in family composition, or a change in the PHA's subsidy standards (see Chapter 5), the new family unit size must be used to determine the payment standard amount for the family **immediately or** at the family's *first annual* reexamination following the change in family unit size.

Utility Allowances [24 CFR 982.517(d)]

The family share of the rent and HAP calculations must reflect any changes in the family's utility arrangement with the owner, or in the PHA's utility allowance schedule [HCV GB, p. 12-5].

Chapter 16 discusses how utility allowance schedules are established.

When there are changes in the utility arrangement with the owner, the PHA must use the utility allowances in effect at the time the new lease and HAP contract are executed.

At reexamination, the PHA must use the PHA current utility allowance schedule [HCV GB, p. 18-8].

PHA Policy

Revised utility allowances will be applied to a family's rent and subsidy calculations at the first annual reexamination after the allowance is adopted.

11-III.C. NOTIFICATION OF NEW FAMILY SHARE AND HAP AMOUNT

The PHA must notify the owner and family of any changes in the amount of the HAP payment [HUD-52641, HAP Contract]. The notice must include the following information [HCV GB, p. 12-6]:

- The amount and effective date of the new HAP payment
- The amount and effective date of the new family share of the rent
- The amount and effective date of the new tenant rent to owner
- The family must be given an opportunity for an informal hearing regarding the PHA's determination of their annual or adjusted income, and the use of such income to compute the housing assistance payment [24 CFR 982.555(a)(1)(i)] (see Chapter 16).

PHA Policy

The notice to the family will include the annual and adjusted income amounts that were used to calculate the family share of the rent and the housing assistance payment.

The notice will state the family has the right to request an explanation of how the assistance was calculated and if the family disagrees, they have the right to informal hearing. The notice will include the procedures for requesting an informal hearing.

11-III.D. DISCREPANCIES

During an annual or interim reexamination, the PHA may discover that information previously reported by the family was in error, or that the family intentionally misrepresented information. In addition, the PHA may discover errors made by the PHA. When errors resulting in the overpayment or underpayment of subsidy are discovered, corrections will be made in accordance with the policies in Chapter 13.

PART IV: NON-INTERIM REEXAMINATION TRANSACTIONS [Notice PIH 2023-27]

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 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;
- Adding or removing a non-family member (i.e., live-in aide, foster child, foster adult);
- 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 a family member and the increase in adjusted income does not trigger an interim reexamination under the final rule;
- Removing a family member and the increase in adjusted income does not trigger an interim reexamination under the final rule;
- 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.

EXHIBIT 11-1: CALCULATING INCOME AT ANNUAL REEXAMINATION

Example 1: Calculating Annual Income at Annual Reexamination Using EIV

Staff are processing the 3/1/2024 annual reexamination for Ruby Myers and her minor daughter, Georgia. No interim reexaminations have been processed, and Ruby has not reported any changes to annual income to the PHA since the 3/1/2023 annual reexamination. The SSA published 2024 COLA is 7 percent.	
<u>Last reexamination – 3/1/2023 Annual Reexamination</u>	
<u>Ruby:</u>	<u>Georgia:</u>
<u>Wages: \$30,000</u>	<u>SSI: \$10,980 (\$915 monthly)</u>

The EIV report pulled on 12/15/2023

Ruby:	Georgia:
Wages Total: \$33,651	SSI Total: \$10,980
Quarter 3 of 2023: \$8,859 (City Public School)	2023 benefit \$915 monthly
Quarter 2 of 2023: \$8,616 (City Public School)	
Quarter 1 of 2023: \$8,823 (City Public School)	
Quarter 4 of 2022: \$7,353 (City Public School)	

<u>Income Reported on Reexamination Application</u>	
Ruby: <u>Wages at City Public School: \$32,000</u> <u>(switched jobs but no permanent change to amount)</u>	Georgia: <u>SSI benefits: \$10,980 (no changes)</u>
<u>Calculating Ruby's wages:</u> Step 1: Determine prior annual income from EIV (i.e., Q4 2022 through Q3 of 2023: \$33,651). Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination (in this case, there have been no interim reexaminations processed since the last annual reexamination). Step 3: Ruby certifies that the \$33,651 of wages in EIV is accurate and reflects her current annual income, so the PHA will use \$33,651 for annual wages for the 3/1/2024 annual reexamination given there have been no additional changes to annual income.	<u>Calculating Georgia's SSI benefit:</u> Step 1: Determine the prior annual income from EIV (i.e., \$915 x 12 months: \$10,980). Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination (in this case, there have been no interim reexaminations processed since the last annual reexamination). Step 3: Ruby certifies the SSI income in EIV is accurate and reflects Georgia's current annual income. The PHA must adjust the prior-year income (2023 SSI benefit) by the 7- percent COLA and will use this amount to calculate annual SSI income for the 3/1/2024 annual reexamination: COLA: \$64.05 (\$915 x 0.07) New gross SSI benefit: \$11,748.60 (\$979.05 x 12 months)
If Ruby did not agree with the annual wages reported in EIV, the PHA/MFH Owner would be required to verify her current income in accordance with HUD's verification hierarchy.	
<u>Summary of Annual Income (as reported on the HUD-50058)</u>	
Ruby (Head of Household): Other Wage: \$33,651 Myers Family Total Annual Income: \$45,399	Georgia (Other Youth Under 18): SSI: \$11,748

**Example 2: Calculating Annual Income at Annual Reexamination Using EIV:
Family Disagrees with EIV**

Staff are processing Paul Hewson's 5/1/2024 annual reexamination. Since the last annual reexamination, Paul reported a decrease in annual income that exceeded 10 percent. Last year, Paul reported a decrease in earned income because he transferred from a full-time job at Sasha's Sweets to a part-time job at Viking Bakery. Following HUD's EIV verification hierarchy, staff confirmed Paul was no longer employed at Sasha's Sweets and decreased his anticipated annual income from \$28,000 to \$7,500 resulting from his new part-time employment at Viking Bakery; an interim reexamination was processed effective 7/1/2023. After the 7/1/2023 interim, Paul worked briefly at two different jobs, but he says he is no longer working and is not planning to work.

5/1/2023 Annual Reexamination

Wages: \$28,000

The EIV report pulled on 1/15/2024

Wages Total: \$18,271
 Quarter 3 of 2023: \$2,500 (Viking Bakery)
 Quarter 3 of 2023: \$796 (Sweet Tooth Candy Bar)
 Quarter 2 of 2023: \$1,300 (Sasha's Sweets)
 Quarter 2 of 2023: \$584 (Larry's Concessions)
 Quarter 2 of 2023: \$2,401 (Viking Bakery)
 Quarter 1 of 2023: \$6,500 (Sasha's Sweets)
 Quarter 4 of 2022: \$600 (Sasha's Sweets)
 SS/SSI: No history of benefits

<u>Income Reported on Reexamination Application</u> <u>Wages: \$0 (permanent change; no longer receiving)</u> <u>Social Security: \$14,400 (\$1,200 monthly)</u> Paul certified on the PHA's annual reexamination paperwork that he does not agree with the annual wages of \$18,271 reported in EIV and it is not reflective of his current anticipated annual income. He reported he is currently unemployed, and provided a copy of an award letter from the Social Security Administration to document that he will begin receiving a monthly disability benefit of \$1,200 effective 3/1/2024.
<u>Calculating Wages and SS Benefit</u> Step 1: Determine prior annual income taking into consideration the 7/1/2023 interim reexamination (i.e., EIV wages reflected Q4 2022 through Q3 2023: \$18,271) Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there was a 7/1/2023 interim that reduced wages to \$7,500. Step 3: Obtain documentation to verify current income and confirm Paul is no longer employed at Viking Bakery or The Sweet Tooth Candy Bar (the employers reported in the most recent quarter of EIV). This step is necessary, because Paul did not agree with the EIV income report or income reported on the last interim reexamination. Paul reported that he is no longer working at all. Process the annual reexamination effective 5/1/2024 using annual SS income of \$14,400 and \$0 wages.
<u>Summary of Annual Income (as reported on the HUD-50058)</u> Paul (Head of Household): \$14,400 (SS) Hewson Family Total Annual Income: \$14,400

Example 3: Calculating Annual Income at Annual Reexamination

Staff are processing the 11/1/2024 annual reexamination for Samantha and Fergus Pool, head of household and spouse. On 2/14/2024 Samantha reported her monthly child support payment was reduced from \$200 to \$100 per month, but an interim reexamination was not processed because the reduction in child support income for Samantha's daughter, Hailey, did not result in a decrease of 10 percent or more in annual adjusted income, and the PHA did not establish a lower threshold. Samantha did not report any additional changes to the PHA.

Last reexamination – 11/1/2023 Annual Reexamination

Samantha:

Business income: \$28,000

VA disability pension: \$12,000

Child support: \$2,400

Fergus:

Wages: \$8,250

Other non-wage income: \$3,000 (Go Fund

Me online fundraiser)

The EIV report pulled on 9/16/2024

Samantha:

Wages Total: \$0 (no wage data reported since Q1 2023)

Fergus:

Wages Total: \$8,600

Quarter 1 of 2024: \$2,100 (Ian's Fish 'n' Chips)

Quarter 1 of 2024: \$500 (Claire's Healthcare Supplies)

Quarter 4 of 2023: \$1,000 (Claire's Healthcare Supplies)

Quarter 3 of 2023: \$1,800 (The Onion Garden Shop)

Quarter 2 of 2023: \$3,200 (Ivar's Fish Haus)

<u>Current Family Circumstances: Income Reported on Reexamination Application</u> Samantha and Fergus reported how much income was earned/received in the previous 12-month period and noted permanent changes, where applicable, for each source of their income on PHA’s annual reexamination form. However, no information was reported by the family concerning other non-wage income. Fergus reported only wages and his current employment at Ian’s Fish ‘n’ Chips for the annual reexamination. The family supplied the supporting documentation noted below to the PHA for the 11/1/2024 annual reexamination.	
Samantha: Business income: \$28,750 (last year); has decreased to \$18,000 (permanent change) VA disability benefit: \$12,000 (last year); has increased to \$12,300 (permanent change) Child support: \$2,400 (last year); has decreased to \$1,200 (permanent change)	Fergus: Wages: \$6,000

<u>Calculating Samantha’s Net Business Income</u> Step 1: Determine prior annual net business income (i.e., \$28,000 on last HUD–50058). Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there have been no interim reexaminations processed since the last annual reexamination. Step 3: Adjust to reflect current net business income. Samantha reported on the annual reexamination application that business income permanently decreased to \$18,000. The PHA must obtain supporting documentation from Samantha that demonstrates current net business income. Samantha provided documentation that supported the current annual net business income is \$18,000. Process the annual reexamination effective 11/1/2024 using annual net business income determined in Step 3.
<u>Calculating Samantha’s VA Pension Income</u> Step 1: Determine prior annual VA pension income (i.e., \$12,000 supported by a VA award letter Samantha supplied that documents the prior year monthly VA pension was \$1,000). Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there have been no interim reexaminations processed since the last annual reexamination. Step 3: The PHA needs to adjust to reflect current VA pension income. Samantha supplies a VA award letter showing a monthly pension of \$1,025, or \$12,300 annually. Process the annual reexamination effective 11/1/2024 using annual VA pension income determined in Step 3 (\$12,300 in this example).
<u>Calculating Samantha’s Child Support Income</u> Step 1: Determine prior annual child support income (i.e., \$2,400 on the last HUD–50058). Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there have been no interim reexaminations processed since the last annual reexamination. The family reported a decrease from \$200 to \$100 monthly, but the change was not processed because it did not meet the threshold. Step 3: The family reported changes, so the PHA must adjust to reflect current child support income. In this example, the family submitted a child support history report from the local child support office that documents regular \$100 monthly child supports payments beginning

3/1/2024 through the current month. Process the annual reexamination effective 11/1/2024 using current annual child support income determined in Step 3 (\$1,200 in this example).

Calculating Fergus' Wages

Step 1: Determine prior annual income from wages in EIV (i.e., Q2 2023 through Q1 of 2024: \$8,600).

Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there have been no interim reexaminations processed since the last annual reexamination.

Step 3: There is a discrepancy between what the family reported and EIV, so the PHA must verify and adjust to reflect current annual income from wages. Fergus reported \$6,000 in annual income from wages on the annual reexamination from a single employer, Ian's Fish 'n' Chips. The PHA projected annual income of \$7,800 based on the two paystubs for this employer, and EIV shows \$8,600 earned in the most recent four quarters in EIV. To complete Step 3, the PHA must do the following:

- Resolve the discrepancy between EIV wages, the \$6,000 annual income Fergus reported, and the \$7,800 projected based on the paystubs he provided, and
- Verify he is no longer employed at Claire's Healthcare Supplies in accordance with HUD's verification hierarchy and local policies.

The PHA determined that Fergus reported his net vs. gross annual income from wages, which he corrected on the annual reexamination form to reflect his current gross annual income of \$9,000. The PHA verified Fergus was no longer employed at Claire's Healthcare Supplies and obtained two additional paystubs. Based on four current and consecutive paystubs, Fergus is now projected to earn \$9,360 annually. Process the annual reexamination effective 11/1/2024 using income from wages determined in Step 3 (\$9,360 in this example).

Calculating Fergus' Other Non-Wage Income

Step 1: Determine prior annual income from other non-wage income (i.e., \$3,000 on the last HUD- 50058).

Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there have been no interim reexaminations processed since the last annual reexamination.

Step 3: The family did not report any non-wage income on the annual reexamination form, but it was included on the last HUD-50058. The PHA must verify and adjust to reflect current non-wage income. The PHA must verify no income was received through a "Go Fund Me" online fundraiser so that it may be excluded. Fergus provided a self-certification that he hasn't solicited funds online and doesn't plan to in the following year; he also provided records from the account that documented no fundraising activity in the prior 12-month period. Process the annual reexamination effective 11/1/2024 using annual non-wage income of \$0 determined in Step 3.

Summary of Annual Income (as reported on the HUD-50058)

Samantha (Head of Household):

Own business: \$18,000

Pension: \$12,300

Child support: \$1,200

Fergus (Co-head):

Wages: \$9,360

Poole Family Total Annual Income: \$40,860

Chapter 12

TERMINATION OF ASSISTANCE AND TENANCY

HUD regulations specify mandatory and optional grounds for which a PHA can terminate a family's assistance. They also specify the circumstances under which an owner may terminate the tenancy of an assisted family.

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

This chapter describes the policies that govern mandatory and optional terminations of assistance, and termination of tenancy by the owner. It is presented in three parts:

Part I: Grounds for Termination of Assistance. This part describes the various circumstances under which assistance under the program can be terminated by the family or by the PHA.

Part II: Approach to Termination of Assistance. This part describes the policies and the process that the PHA will use in evaluating decisions on whether to terminate assistance due to actions or inactions of the family where termination is an option. It specifies the alternatives that the PHA may consider in lieu of termination, the criteria the PHA will use when deciding what action to take, and the steps the PHA must take when terminating a family's assistance.

Part III: Termination of Tenancy by the Owner. This part describes the HUD policies that govern the owner's right to terminate an assisted tenancy.

PART I: GROUNDS FOR TERMINATION OF ASSISTANCE

12-I.A. OVERVIEW

HUD requires the PHA to terminate assistance for certain actions and inactions of the family and when the family no longer requires assistance due to increases in family income. HUD permits the PHA to terminate assistance for certain other actions or inactions of the family. In addition, a family may decide to withdraw from the program and terminate their HCV assistance at any time by notifying the PHA.

12-I.B. FAMILY NO LONGER REQUIRES ASSISTANCE [24 CFR 982.455]

As a family's income increases, the amount of the housing assistance payment decreases. If the amount of assistance provided by the PHA is reduced to zero, the family's assistance terminates automatically 180 days after the last HAP payment.

PHA Policy

If a participating family receiving zero assistance experiences a change in circumstances that would result in a HAP payment to the owner, the family must notify the PHA of the change and request an interim reexamination before the expiration of the 180-day period.

12-I.C. FAMILY CHOOSES TO TERMINATE ASSISTANCE

The family may request that the PHA terminate housing assistance payments on behalf of the family at any time.

PHA Policy

The request to terminate assistance should be made in writing and signed by the head of household, and spouse or cohead if applicable. Before terminating the family's assistance, the PHA will follow the notice requirements in Section 12-II.F.

12-I.D. MANDATORY TERMINATION OF ASSISTANCE

HUD requires the PHA to terminate assistance in the following circumstances.

Eviction [24 CFR 982.552(b)(2), 24 CFR 5.2005(c)(1)]

The PHA must terminate assistance whenever a family is evicted from a unit assisted under the HCV program for a serious or repeated violation of the lease. As discussed further in section 12-II.E, incidents of actual or threatened domestic violence, dating violence, sexual assault, stalking **or human trafficking** may not be construed as serious or repeated violations of the lease by the victim or threatened victim of such violence or stalking.

PHA Policy

A family will be considered *evicted* if the family moves after a legal eviction order has been issued, whether or not physical enforcement of the order was necessary.

If a family moves after the owner has given the family an eviction notice for serious or repeated lease violations but before a legal eviction order has been issued, termination of assistance is not mandatory. In such cases the PHA will determine whether the family has committed serious or repeated violations of the lease based on available evidence and may terminate assistance or take any of the alternative measures described in section 12-II.C. In making its decision, the PHA will consider the factors described in sections 12-II.D and 12-II.E. Upon consideration of such factors, the PHA may, on a case-by-case basis, choose not to terminate assistance.

Serious and 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. Generally, the criterion to be used will be whether or not the reason for the eviction was the fault of the tenant or guests.

Upon the PHA's HOTMA 102/104 compliance date, the below section on failure to provide consent is added:

Failure to Provide Consent [24 CFR 982.552(b)(3)]

The PHA must terminate assistance if any family member fails to sign and submit any consent form they are required to sign for a regular or interim reexamination. See Chapter 7 for a complete discussion of consent requirements.

~~Failure to Provide Consent [24 CFR 982.552(b)(3)]~~

~~The PHA must terminate assistance if any family member fails to sign and submit any consent form they are required to sign for a regular or interim reexamination. See Chapter 7 for a complete discussion of consent requirements.~~

Failure to Document Citizenship [24 CFR 982.552(b)(4) and [24 CFR 5.514(c)]

The PHA must terminate assistance if (1) a family fails to submit required documentation within the required timeframe concerning any family member's citizenship or immigration status; (2) a family submits evidence of citizenship and eligible immigration status in a timely manner, but United States Citizenship and Immigration Services (USCIS) primary and secondary verification does not verify eligible immigration status of the family; or (3) a family member, as determined by the PHA, has knowingly permitted another individual who is not eligible for assistance to reside (on a permanent basis) in the unit.

For (3) above, such termination must be for a period of at least 24 months. This does not apply to ineligible noncitizens already in the household where the family's assistance has been prorated. See Chapter 7 for a complete discussion of documentation requirements.

Failure to Disclose and Document Social Security Numbers [24 CFR 5.218(c), Notice PIH 2018-24]

The PHA must terminate assistance if a participant family fails to disclose the complete and accurate social security numbers of each household member and the documentation necessary to verify each social security number.

However, if the family is otherwise eligible for continued program assistance, and the PHA determines that the family's failure to meet the SSN disclosure and documentation requirements was due to circumstances that could not have been foreseen and were outside of the family's control, the PHA may defer the family's termination and provide the opportunity to comply with the requirement within a period not to exceed 90 calendar days from the date the PHA determined the family to be noncompliant.

PHA Policy

The PHA will defer the family's termination and provide the family with the opportunity to comply with the requirement for a period of 90 calendar days for circumstances beyond the participant's control such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency, if there is a reasonable likelihood that the participant will be able to disclose an SSN by the deadline.

Methamphetamine Manufacture or Production [24 CFR 982.553(b)(1)(ii)]

The PHA must terminate assistance if any household member has ever been convicted of the manufacture or production of methamphetamine on the premises of federally assisted housing.

Lifetime Registered Sex Offenders [Notice PIH 2012-28]

Should a PHA discover that a member of an assisted household was subject to a lifetime registration requirement at admission and was erroneously admitted after June 25, 2001, the PHA must immediately terminate assistance for the household member.

In this situation, the PHA must offer the family the opportunity to remove the ineligible family member from the household. If the family is unwilling to remove that individual from the household, the PHA must terminate assistance for the household.

Failure of Students to Meet Ongoing Eligibility Requirements [24 CFR 982.552(b)(5) and FR 4/10/06]

If a student enrolled at an institution of higher education is under the age of 24, is not a veteran, is not married, does not have dependent children, is not residing with his/her parents in an HCV assisted household, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the PHA must terminate the student's assistance if, at the time of reexamination, either the student's income or the income of the student's parents (if applicable) exceeds the applicable income limit.

If a participant household consists of both eligible and ineligible students, the eligible students shall not be terminated, but must be issued a voucher to move with continued assistance in accordance with program regulations and PHA policies or must be given the opportunity to lease in place if the terminated ineligible student members elect to move out of the assisted unit.

Death of the Sole Family Member [24 CFR 982.311(d) and Notice PIH 2010-9]

The PHA must immediately terminate program assistance for deceased single member households.

12-I.E. MANDATORY POLICIES AND OTHER AUTHORIZED TERMINATIONS

Mandatory Policies [24 CFR 982.553(b) and 982.551(l)]

HUD requires the PHA to establish policies that permit the PHA to terminate assistance if the PHA determines that:

- Any household member is currently engaged in any illegal use of a drug, or has a pattern of illegal drug use that interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents
- Any household member's abuse or pattern of abuse of alcohol may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents
- Any household member has violated the family's obligation not to engage in any drug-related criminal activity
- Any household member has violated the family's obligation not to engage in violent criminal activity

Use of Illegal Drugs and Alcohol Abuse

PHA Policy

The PHA will terminate a family's assistance if any household member is currently engaged in any illegal use of a drug or has a pattern of illegal drug use that interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.

The PHA will terminate assistance if any household member's abuse or pattern of abuse of alcohol threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.

Currently engaged in is defined as any use of illegal drugs during the previous three months.

The PHA will consider all credible evidence, including but not limited to, any record of arrests, convictions, or eviction of household members related to the use of illegal drugs or abuse of alcohol.

A record or records of arrest will not be used as the sole basis for the termination or proof that the participant engaged in disqualifying criminal activity.

In making its decision to terminate assistance, the PHA will consider alternatives as described in Section 12-II.C and other factors described in Sections 12-II.D and 12-II.E. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate assistance.

Drug-Related and Violent Criminal Activity [24 CFR 5.100]

Drug means a controlled substance as defined in section 102 of the Controlled Substances Act (21 U.S.C. 802).

Drug-related criminal activity is defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug.

Violent criminal activity means any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage.

PHA Policy

The PHA will terminate a family's assistance if any household member has violated the family's obligation not to engage in any drug-related or violent criminal activity during participation in the HCV program.

The PHA will consider all credible evidence, including but not limited to, any record of arrests and/or convictions of household members related to drug-related or violent criminal activity, and any eviction or notice to evict based on drug-related or violent criminal activity.

A record or records of arrest will not be used as the sole basis for the termination or proof that the participant engaged in disqualifying criminal activity.

In making its decision to terminate assistance, the PHA will consider alternatives as described in Section 12-II.C and other factors described in Sections 12-II.D and 12-II.E. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate assistance.

Other Authorized Reasons for Termination of Assistance [24 CFR 982.552(c), 24 CFR 5.2005(c)]

HUD permits the PHA to terminate assistance under a number of other circumstances. It is left to the discretion of the PHA whether such circumstances in general warrant consideration for the termination of assistance. As discussed further in section 12-II.E, the Violence against Women Act of 2013 explicitly prohibits PHAs from considering incidents of, or criminal activity directly related to, domestic violence, dating violence, sexual assault, stalking **or human trafficking** as reasons for terminating the assistance of a victim of such abuse.

Additionally, per 24 CFR 984.101(d), PHAs are no longer permitted to terminate assistance to a family due to the family's failure to meet its obligations under the Family Self-Sufficiency (FSS) contract of participation.

PHA Policy

The PHA **will** terminate a family's assistance if:

The family has failed to comply with any family obligations under the program. See Exhibit 12-1 for a listing of family obligations and related PHA policies.

Any family member has been evicted from federally assisted housing in the last five years.

Any family member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.

The family currently owes rent or other amounts to any PHA in connection with Section 8 or public housing assistance under the 1937 Act.

The family has not reimbursed any PHA for amounts the PHA paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease.

The family has breached the terms of a repayment agreement entered into with the PHA.

A family member has engaged in or threatened violent or abusive behavior toward PHA personnel.

Abusive or violent behavior towards PHA personnel includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

Threatening refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

In making its decision to terminate assistance, the PHA will consider alternatives as described in Section 12-II.C and other factors described in Sections 12-II.D and 12-II.E. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate assistance.

Family Absence from the Unit [24 CFR 982.312]

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.

PHA Policy

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.

Upon the PHA's HOTMA 102/104 compliance date, the below section on the asset limitation is added:
Asset Limitation [24 CFR 5.618; Notice PIH 2023-27]

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

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 [24 CFR 982.454]

The PHA may terminate HAP contracts if the PHA determines, in accordance with HUD requirements, that funding under the consolidated ACC is insufficient to support continued assistance for families in the program.

PHA Policy

The PHA will determine whether there is sufficient funding to pay for currently assisted families according to the policies in Part VIII of Chapter 16. If the PHA determines there is a shortage of funding, prior to terminating any HAP contracts, the PHA will determine if any other actions can be taken to reduce program costs.

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 (NED families, HUD-Veterans Affairs Supportive Housing (VASH) families, and 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.

If after implementing all reasonable cost cutting measures there is not enough funding available to provide continued assistance for current participants, the PHA will terminate HAP contracts as a last resort.

Prior to terminating any HAP contracts, the PHA will inform the local HUD field office. The PHA will terminate the minimum number needed in order to reduce HAP costs to a level within the PHA's annual budget authority.

If the PHA must terminate HAP contracts due to insufficient funding, the PHA will do so in accordance with the following criteria and instructions:

Families who have been assisted in the HCV program the longest will be the first to be terminated, excluding families that include elderly or disabled family members.

Families comprising the required number of special purpose vouchers, including nonelderly disabled (NED), HUD-Veteran's Affairs Supportive Housing (HUD-VASH), and family unification program (FUP) will be the last to be terminated.

PART II: APPROACH TO TERMINATION OF ASSISTANCE

12-II.A. OVERVIEW

The PHA is required by regulation to terminate a family's assistance for certain actions or inactions of the family. For other types of actions or inactions of the family, the regulations give the PHA the authority to either terminate the family's assistance or to take another action. This part discusses the various actions the PHA may choose to take when it has discretion and outlines the criteria the PHA will use to make its decision about whether or not to terminate assistance. It also specifies the requirements for the notification to the family of the PHA's intent to terminate assistance.

12-II.B. METHOD OF TERMINATION [24 CFR 982.552(a)(3)]

Termination of assistance for a participant may include any or all of the following:

- Terminating housing assistance payments under a current HAP contract,
- Refusing to enter into a new HAP contract or approve a lease, or
- Refusing to process a request for or to provide assistance under portability procedures.

12-II.C. ALTERNATIVES TO TERMINATION OF ASSISTANCE

Change in Household Composition

As a condition of continued assistance, the PHA may require that any household member who participated in or was responsible for an offense no longer resides in the unit [24 CFR 982.552(c)(2)(ii)].

PHA Policy

As a condition of continued assistance, the head of household must certify that the culpable family member has vacated the unit and will not be permitted to visit or to stay as a guest in the assisted unit. The family must present evidence of the former family member's current address upon PHA request.

Repayment of Family Debts

PHA Policy

If a family owes amounts to the PHA, as a condition of continued assistance, the PHA will require the family to repay the full amount or to enter into a repayment agreement, within 30 days of receiving notice from the PHA of the amount owed. See Chapter 16 for policies on repayment agreements.

12-II.D. CRITERIA FOR DECIDING TO TERMINATE ASSISTANCE

Evidence

For criminal activity, HUD permits the PHA to terminate assistance if a *preponderance of the evidence* indicates that a household member has engaged in the activity, regardless of whether the household member has been arrested or convicted [24 CFR 982.553(c)].

PHA Policy

The PHA will use the concept of the preponderance of the evidence as the standard for making all termination decisions.

Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not.

Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence

Use of Criminal Conviction Records after Admission [24 CFR 5.903]

The regulation at 24 CFR 5.903 governs a PHA's access to and use of criminal conviction records obtained from a "law enforcement agency" such as the National Crime Information Center (NCIC), police departments, and other law enforcement agencies that hold criminal conviction records. While the regulatory listing of permitted uses for these records includes PHA screening of applicants for admission to the HCV program, it specifically excludes the use of records for lease enforcement and eviction of HCV participants and excludes by omission a PHA's use of records to terminate assistance for participants. While a PHA has regulatory authority to use criminal conviction records for the purpose of applicant screening for admission, there is no corresponding authority to use these records to check for criminal and illegal drug activity by participants, and therefore, PHAs may not use records for this purpose. The limitations, however, do not apply to criminal conviction information searches from non-federal sources (i.e., sources other than the "law enforcement agencies" defined in 24 CFR 5.902(b)). There is no prohibition that bars a PHA from using non-federal sources to conduct criminal background checks of program participants.

Consideration of Circumstances [24 CFR 982.552(c)(2)(i)]

The PHA is permitted, but not required, to consider all relevant circumstances when determining whether a family's assistance should be terminated.

PHA Policy

The PHA will consider the following facts and circumstances when making its decision to terminate assistance:

The seriousness of the case, especially with respect to how it would affect other residents' safety or property

The effects that termination of assistance may have on other members of the family who were not involved in the action or failure to act

The extent of participation or culpability of individual family members, including whether the culpable family member is a minor or a person with disabilities or (as discussed further in section 12-II.E) a victim of domestic violence, dating violence, sexual assault, stalking or human trafficking.

The length of time since the violation occurred, including the age of the individual at the time of the conduct, as well as the family's recent history and the likelihood of favorable conduct in the future

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. The PHA may also consider:

- Any statements made by witnesses, or the participant 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 participant engaged in disqualifying activity

Evidence of criminal conduct will be considered if it indicates a demonstrable risk to safety and/or property

In the case of drug or alcohol abuse, whether the culpable household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program or has otherwise been rehabilitated successfully

The PHA will require the participant to submit evidence of the household member's current participation in or successful completion of a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.

In the case of program abuse, the dollar amount of the overpaid assistance and whether or not a false certification was signed by the family

Reasonable Accommodation [24 CFR 982.552(c)(2)(iv)]

If the family includes a person with disabilities, the PHA's decision to terminate the family's assistance is subject to consideration of reasonable accommodation in accordance with 24 CFR Part 8.

PHA Policy

If a family indicates that the behavior of a family member with a disability is the reason for a proposed termination of assistance, the PHA will determine whether the behavior is related to the disability. If so, upon the family's request, the PHA will determine whether alternative measures are appropriate as a reasonable accommodation. The PHA will only consider accommodations that can reasonably be expected to address the behavior that is the basis of the proposed termination of assistance. See Chapter 2 for a discussion of reasonable accommodation.

12-II.E. TERMINATIONS RELATED TO DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, STALKING OR HUMAN TRAFFICKING

This section describes the protections against termination of assistance that the Violence against Women Act of 2013 (VAWA) provides for victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking. For general VAWA requirements, key VAWA definitions, and PHA policies pertaining to notification, documentation, and confidentiality, see section 16-IX of this plan.

VAWA Protections against Termination

VAWA provides four specific protections against termination of HCV assistance for victims of domestic violence, dating violence, sexual assault or stalking. (*Note:* The second, third, and fourth protections also apply to terminations of tenancy or occupancy by owners participating in the HCV program, as do the limitations discussed under the next heading.)

First, VAWA provides that a PHA may not terminate assistance to a family that moves out of an assisted unit in violation of the lease, with or without prior notification to the PHA, if the move occurred to protect the health or safety of a family member who is or has been the victim of domestic violence, dating violence, sexual assault, stalking, **or human trafficking**, and who reasonably believed he or she was imminently threatened by harm from further violence if he or she remained in the unit [24 CFR 982.354(b)(4)].

Second, it provides that an incident or incidents of actual or threatened domestic violence, dating violence, sexual assault, stalking, **or human trafficking** may not be construed either as a serious or repeated lease violation by the victim or as good cause to terminate the assistance of the victim [24 CFR 5.2005(c)(1)].

Third, it provides that criminal activity directly related to domestic violence, dating violence, sexual assault or stalking may not be construed as cause for terminating the assistance of a tenant if a member of the tenant's household, a guest, or another person under the tenant's control is the one engaging in the criminal activity and the tenant or affiliated individual or other individual is the actual or threatened victim of the domestic violence, dating violence, stalking **or human trafficking** [24 CFR 5.2005(c)(2)].

Fourth, it gives PHAs the authority to terminate assistance to any tenant or lawful occupant who engages in criminal acts of physical violence against family members or others without terminating assistance to, or otherwise penalizing, the victim of the violence [24 CFR 5.2009(a)].

PHAs and owners may not coerce, intimidate, threaten, interfere with, or retaliate against any person who exercises or assists or encourages a person to exercise any rights or protections under VAWA [FR Notice 1/4/23].

Limitations on VAWA Protections [24 CFR 5.2005(d) and (e)]

VAWA does not limit the authority of a PHA to terminate the assistance of a victim of abuse for reasons unrelated to domestic violence, dating violence, sexual assault, stalking, **or human trafficking** so long as the PHA does not subject the victim to a more demanding standard than it applies to other program participants [24 CFR 5.2005(d)(1)].

Likewise, VAWA does not limit the authority of a PHA to terminate the assistance of a victim of domestic violence, dating violence, sexual assault, stalking, **or human trafficking** if the PHA can demonstrate an actual and imminent threat to other tenants or those employed at or providing service to the assisted property if the victim is not terminated from assistance [24 CFR 5.2005(d)(2)].

HUD regulations define *actual and imminent threat* to mean words, gestures, actions, or other indicators of a physical threat that (a) is real, (b) would occur within an immediate time frame, and (c) could result in death or serious bodily harm [24 CFR 5.2005(d)(2) and (e)]. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include:

- The duration of the risk
- The nature and severity of the potential harm
- The likelihood that the potential harm will occur
- The length of time before the potential harm would occur [24 CFR 5.2005(e)]

In order to demonstrate an actual and imminent threat, the PHA must have objective evidence of words, gestures, actions, or other indicators. Even when a victim poses an actual and imminent threat, however, HUD regulations authorize a PHA to terminate the victim's assistance "only when there are no other actions that could be taken to reduce or eliminate the threat" [24 CFR 5.2005(d)(3)].

PHA Policy

In determining whether a program participant who is a victim of domestic violence, dating violence, sexual assault, stalking, **or human trafficking** is an actual and imminent threat to other tenants or those employed at or providing service to a property, the PHA will consider the following, and any other relevant, factors:

Whether the threat is toward an employee or tenant other than the victim of domestic violence, dating violence, sexual assault, stalking, **or human trafficking**

Whether the threat is a physical danger beyond a speculative threat

Whether the threat is likely to happen within an immediate time frame

Whether the threat to other tenants or employees can be eliminated in some other way, such as by helping the victim relocate to a confidential location or seeking a legal remedy to prevent the perpetrator from acting on the threat

If the participant wishes to contest the PHA's determination that he or she is an actual and imminent threat to other tenants or employees, the participant may do so as part of the informal hearing.

Documentation of Abuse [24 CFR 5.2007]

PHA Policy

When an individual facing termination of assistance for reasons related to domestic violence, dating violence, sexual assault, stalking, **or human trafficking** claims protection under VAWA, the PHA will request that the individual provide documentation supporting the claim in accordance with the policies in section 16-IX.D of this plan.

The PHA reserves the right to waive the documentation requirement if it determines that a statement or other corroborating evidence from the individual will suffice. In such cases the PHA will document the waiver in the individual's file.

Terminating the Assistance of a Domestic Violence Perpetrator

Although VAWA provides protection against termination of assistance for victims of domestic violence, it does not provide such protection for perpetrators. VAWA gives the PHA the explicit authority to “terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others” without terminating assistance to “or otherwise penalizing the victim of such violence who is also a tenant or lawful occupant” [24 CFR 5.2009(a)]. This authority is not dependent on a bifurcated lease or other eviction action by an owner against an individual family member. Further, this authority supersedes any local, state, or other federal law to the contrary. However, if the PHA chooses to exercise this authority, it must follow any procedures prescribed by HUD or by applicable local, state, or federal law regarding termination of assistance. This means that the PHA must follow the same rules when terminating assistance to an individual as it would when terminating the assistance of an entire family [~~3/16/07 Federal Register notice on the applicability of VAWA to HUD programs~~].[FR Notice 3/16/07].

If the perpetrator remains in the unit, the PHA continues to pay the owner until the PHA terminates the perpetrator from the program. The PHA must not stop paying HAP until 30 days after the owner bifurcates the lease to evict the perpetrator. The PHA may pay HAP for the full month if the 30-day period will end mid-month [Notice PIH 2017-08].

If the perpetrator is the only participant eligible to receive assistance, the PHA will provide any remaining participant a chance to establish eligibility for the program. If the remaining participant cannot do so, the PHA will provide them with 30 days to establish eligibility for another housing program prior to termination of the HAP contract.

PHA Policy

The PHA will terminate assistance to a family member if the PHA determines that the family member has committed criminal acts of physical violence against other family members or others. This action will not affect the assistance of the remaining, nonculpable family members.

In making its decision, the PHA will consider all credible evidence, including, but not limited to, a signed certification (form HUD-5382) or other documentation of abuse submitted to the PHA by the victim in accordance with this section and section 16-IX.D. The PHA will also consider the factors in section 12-II.D. Upon such consideration, the PHA may, on a case-by-case basis, choose not to terminate the assistance of the culpable family member.

If the PHA does terminate the assistance of the culpable family member, it will do so in accordance with applicable law, HUD regulations, and the policies in this plan.

12-II.F. TERMINATION NOTICE

HUD regulations require PHAs to provide written notice of termination of assistance to a family only when the family is entitled to an informal hearing. However, since the family's HAP contract and lease will also terminate when the family's assistance terminates [form HUD-52641], it is a good business practice to provide written notification to both owner and family anytime assistance will be terminated, whether voluntarily or involuntarily.

PHA Policy

Whenever a family's assistance will be terminated, the PHA will send a written notice of termination to the family and to the owner. The PHA will also send a form HUD-5382 and form HUD-5380 to the family with the termination notice. The notice will state the date on which the termination will become effective. This date generally will be at least 30 calendar days following the date of the termination notice, but exceptions will be made whenever HUD rules, other PHA policies, or the circumstances surrounding the termination require.

When the PHA notifies an owner that a family's assistance will be terminated, the PHA will, if appropriate, advise the owner of his/her right to offer the family a separate, unassisted lease.

If a family whose assistance is being terminated is entitled to an informal hearing, the notice of termination that the PHA sends to the family must meet the additional HUD and PHA notice requirements discussed in section 16-III.C of this plan. VAWA 2013 expands notification requirements to require PHAs to provide notice of VAWA rights and the HUD 5382 form when a PHA terminates a household's housing benefits.

PHA Policy

Whenever the PHA decides to terminate a family's assistance because of the family's action or failure to act, the PHA will include in its termination notice the VAWA information described in section 16-IX.C of this plan and a form HUD-5382 and form HUD-5380. The PHA will request in writing that a family member wishing to claim protection under VAWA notify the PHA within 14 business days.

Still other notice requirements apply in two situations:

- If a criminal record is the basis of a family's termination, the PHA must provide a copy of the record to the subject of the record and the tenant so that they have an opportunity to dispute the accuracy and relevance of the record [24 CFR 982.553(d)(2)].
- If immigration status is the basis of a family's termination, as discussed in section 12-I.D, the special notice requirements in section 16-III.D must be followed.

PART III: TERMINATION OF TENANCY BY THE OWNER

12-III.A. OVERVIEW

Termination of an assisted tenancy is a matter between the owner and the family; the PHA is not directly involved. However, the owner is under some constraints when terminating an assisted tenancy. Termination of tenancy for certain reasons will also result in termination of assistance as discussed in this section.

12-III.B. GROUNDS FOR OWNER TERMINATION OF TENANCY [24 CFR 982.310, 24 CFR 5.2005(c), and Form HUD-52641-A, Tenancy Addendum]

During the term of the lease, the owner is not permitted to terminate the tenancy except for serious or repeated violations of the lease, certain violations of state or local law, or other good cause.

Serious or Repeated Lease Violations

The owner is permitted to terminate the family's tenancy for serious or repeated violations of the terms and conditions of the lease, except when the violations are related to incidents of actual or threatened domestic violence, dating violence, sexual assault or stalking and the victim is protected from eviction by the Violence against Women Act of 2013 (see section 12-II.E). A serious lease violation includes failure to pay rent or other amounts due under the lease. However, the PHA's failure to make a HAP payment to the owner is not a violation of the lease between the family and the owner.

Violation of Federal, State, or Local Law

The owner is permitted to terminate the tenancy if a family member violates federal, state, or local law that imposes obligations in connection with the occupancy or use of the premises.

Criminal Activity or Alcohol Abuse

The owner may terminate tenancy during the term of the lease if any *covered person*—meaning any member of the household, a guest, or another person under the tenant's control—commits any of the following types of criminal activity (for applicable definitions see 24 CFR 5.100):

- Any criminal activity that threatens the health or safety of, or the right to peaceful enjoyment of the premises by, other residents (including property management staff residing on the premises)
- Any criminal activity that threatens the health or safety of, or the right to peaceful enjoyment of their residences by, persons residing in the immediate vicinity of the premises
- Any violent criminal activity on or near the premises
- Any drug-related criminal activity on or near the premises

However, in the case of criminal activity directly related to domestic violence, dating violence, sexual assault or stalking, if the tenant or an affiliated individual is the victim, the criminal activity may not be construed as cause for terminating the victim's tenancy (see section 12-II.E).

The owner may terminate tenancy during the term of the lease if any member of the household is:

- Fleeing to avoid prosecution, custody, or confinement after conviction for a crime or an attempt to commit a crime that is a felony under the laws of the place from which the individual flees, or that, in the case of the State of New Jersey, is a high misdemeanor; or
- Violating a condition of probation or parole imposed under federal or state law.

The owner may terminate tenancy during the term of the lease if any member of the household has engaged in abuse of alcohol that threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.

Evidence of Criminal Activity

The owner may terminate tenancy and evict by judicial action a family for criminal activity by a covered person if the owner determines the covered person has engaged in the criminal activity, regardless of whether the covered person has been arrested or convicted for such activity and without satisfying the standard of proof used for a criminal conviction. This is the case except in certain incidents where the criminal activity directly relates to domestic violence, dating violence, sexual assault, or stalking, and the tenant or an affiliated individual is the victim or threatened victim of the domestic violence, dating violence, sexual assault, stalking, **or human trafficking**.

Other Good Cause

During the initial lease term, the owner may not terminate the tenancy for “other good cause” unless the owner is terminating the tenancy because of something the family did or failed to do. During the initial lease term or during any extension term, other good cause includes the disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises.

After the initial lease term, “other good cause” for termination of tenancy by the owner includes:

- Failure by the family to accept the offer of a new lease or revision
- The owner’s desire to use the unit for personal or family use, or for a purpose other than as a residential rental unit
- A business or economic reason for termination of the tenancy (such as sale of the property, renovation of the unit, or desire to lease the unit at a higher rent)

After the initial lease term, the owner may give the family notice at any time, in accordance with the terms of the lease.

If a property is subject to foreclosure, during the term of the lease, the new owner of the property does not have good cause to terminate the tenant’s lease, unless the new owner will occupy the unit as their primary residence and has provided the tenant with at least a 90-day notice. In that case, the lease may be terminated effective on the date of sale, although the tenant is still entitled to a 90-day notice to vacate. See Section 13-II.G for a discussion of PHA policies relating to units in foreclosure.

12-III.C. EVICTION [24 CFR 982.310(e) and (f) and Form HUD-52641-A, Tenancy Addendum]

The owner must give the tenant a written notice that specifies the grounds for termination of tenancy during the term of the lease. The tenancy does not terminate before the owner has given this notice, and the notice must be given at or before commencement of the eviction action.

The notice of grounds may be included in, or may be combined with, any owner eviction notice to the tenant.

Owner eviction notice means a notice to vacate, or a complaint or other initial pleading used under state or local law to commence an eviction action. The owner may only evict the tenant from the unit by instituting a court action. The owner must give the PHA a copy of any eviction notice at the same time the owner notifies the family. The family is also required to give the PHA a copy of any eviction notice (see Chapter 5).

PHA Policy

If the eviction action is finalized in court, the owner must provide the PHA with documentation related to the eviction, including notice of the eviction date, as soon as possible, but no later than 5 business days following the court-ordered eviction.

12-III.D. DECIDING WHETHER TO TERMINATE TENANCY [24 CFR 982.310(h), 24 CFR 982.310(h)(4)]

An owner who has grounds to terminate a tenancy is not required to do so and may consider all of the circumstances relevant to a particular case before making a decision. These might include:

- The nature of the offending action
- The seriousness of the offending action;
- The effect on the community of the termination, or of the owner's failure to terminate the tenancy;
- The extent of participation by the leaseholder in the offending action;
- The effect of termination of tenancy on household members not involved in the offending activity;
- The demand for assisted housing by families who will adhere to lease responsibilities;
- The extent to which the leaseholder has shown personal responsibility and taken all reasonable steps to prevent or mitigate the offending action;
- The effect of the owner's action on the integrity of the program.

The owner may require a family to exclude a household member in order to continue to reside in the assisted unit, where that household member has participated in or been culpable for action or failure to act that warrants termination.

In determining whether to terminate tenancy for illegal use of drugs or alcohol abuse by a household member who is no longer engaged in such behavior, the owner may consider whether such household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program, or has otherwise been rehabilitated successfully (42 U.S.C. 13661). For this purpose, the owner may require the tenant to submit evidence of the household member's current participation in, or successful completion of, a supervised drug or alcohol rehabilitation program or evidence of otherwise having been rehabilitated successfully.

The owner's termination of tenancy actions must be consistent with the fair housing and equal opportunity provisions in 24 CFR 5.105.

An owner's decision to terminate tenancy for incidents related to domestic violence, dating violence, sexual assault or stalking is limited by the Violence against Women Act of 2013 (VAWA) and the conforming regulations in 24 CFR Part 5, Subpart L. (See section 12-II.E.)

12-III.E. EFFECT OF TENANCY TERMINATION ON THE FAMILY'S ASSISTANCE

If a termination is not due to a serious or repeated violation of the lease, and if the PHA has no other grounds for termination of assistance, the PHA may issue a new voucher so that the family can move with continued assistance (see Chapter 10).

EXHIBIT 12-1: STATEMENT OF FAMILY OBLIGATIONS

Following is a listing of a participant family's obligations under the HCV program:

- The family must supply any information that the PHA or HUD determines to be necessary, including submission of required evidence of citizenship or eligible immigration status.
- The family must supply any information requested by the PHA or HUD for use in a regularly scheduled reexamination or interim reexamination of family income and composition.
- The family must disclose and verify social security numbers and sign and submit consent forms for obtaining information.
- Any information supplied by the family must be true and complete.
- ~~The family is responsible for any deficiencies under the National Standards for the Physical Inspection of Real Estate (NSPIRE) by the family~~ may be held responsible for a breach of housing quality standards caused by the family's failure to pay tenant-provided utilities or appliances, or damages to the dwelling unit or premises beyond ordinary wear and tear caused by any member of the household or guest.

PHA Policy

Damages beyond ordinary wear and tear will be considered to be damages which could be assessed against the security deposit under state law or in court practice.

- The family must allow the PHA to inspect the unit at reasonable times and after reasonable notice, as described in Chapter 8 of this plan.
- The family must not commit any serious or repeated violation of the lease.

PHA Policy

The PHA will determine if a family has committed serious or repeated violations of the lease based on available evidence, including but not limited to, a court-ordered eviction or an owner's notice to evict, police reports, and affidavits from the owner, neighbors, or other credible parties with direct knowledge.

Serious and repeated lease violations will include, but not be limited to, nonpayment of rent, disturbance of neighbors, destruction of property, living or housekeeping habits that cause damage to the unit or premises, and criminal activity. Generally, the criterion to be used will be whether or not the reason for the eviction was the fault of the tenant or guests. Any incidents of, or criminal activity related to, domestic violence, dating violence, sexual assault, stalking, or human trafficking will not be construed as serious or repeated lease violations by the victim [24 CFR 5.2005(c)(1)].

- The family must notify the PHA and the owner before moving out of the unit or terminating the lease.

PHA Policy

The family must comply with lease requirements regarding written notice to the owner.

The family must provide written notice to the PHA at the same time the owner is notified.

- The family must promptly give the PHA a copy of any owner eviction notice.

- The family must use the assisted unit for residence by the family. The unit must be the family's only residence.
- The composition of the assisted family residing in the unit must be approved by the PHA. The family must promptly notify the PHA in writing of the birth, adoption, or court-awarded custody of a child. The family must request PHA approval to add any other family member as an occupant of the unit.

PHA Policy

The request to add a family member must be submitted in writing and approved prior to the person moving into the unit. The PHA will determine eligibility of the new member in accordance with the policies in Chapter 3.

- The family must promptly notify the PHA in writing if any family member no longer lives in the unit.
- If the PHA has given approval, a foster child or a live-in aide may reside in the unit. The PHA has the discretion to adopt reasonable policies concerning residency by a foster child or a live-in aide, and to define when PHA consent may be given or denied. For policies related to the request and approval/disapproval of foster children, foster adults, and live-in aides, see Chapter 3 (Sections I.K and I.M), and Chapter 11 (Section II.B).
- The family must not sublease the unit, assign the lease, or transfer the unit.

PHA Policy

Subleasing includes receiving payment to cover rent and utility costs by a person living in the unit who is not listed as a family member.

- The family must supply any information requested by the PHA to verify that the family is living in the unit or information related to family absence from the unit.
- The family must promptly notify the PHA when the family is absent from the unit.

PHA Policy

Notice is required under this provision only when all family members will be absent from the unit for an extended period. An extended period is defined as any period greater than 30 calendar days. Written notice must be provided to the PHA at the start of the extended absence.

- The family must pay utility bills and provide and maintain any appliances that the owner is not required to provide under the lease [Form HUD-52646, Voucher].
- The family must not own or have any interest in the unit, (other than in a cooperative and owners of a manufactured home leasing a manufactured home space).
- Family members must not commit fraud, bribery, or any other corrupt or criminal act in connection with the program. (See Chapter 14, Program Integrity for additional information).

- Family members must not engage in drug-related criminal activity or violent criminal activity or other criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises. See Chapter 12 for HUD and PHA policies related to drug-related and violent criminal activity.
- Members of the household must not engage in abuse of alcohol in a way that threatens the health, safety or right to peaceful enjoyment of the other residents and persons residing in the immediate vicinity of the premises. See Chapter 12 for a discussion of HUD and PHA policies related to alcohol abuse.
- An assisted family or member of the family must not receive HCV program assistance while receiving another housing subsidy, for the same unit or a different unit under any other federal, state or local housing assistance program.
- A family must not receive HCV program assistance while residing in a unit owned by a parent, child, grandparent, grandchild, sister or brother of any member of the family, unless the PHA has determined (and has notified the owner and the family of such determination) that approving rental of the unit, notwithstanding such relationship, would provide reasonable accommodation for a family member who is a person with disabilities. [Form HUD-52646, Voucher]

Chapter 13

OWNERS

INTRODUCTION

Owners play a major role in the HCV program by supplying decent, safe, and sanitary housing for participating families.

The term “owner” refers to any person or entity with the legal right to lease or sublease a unit to a participant in the HCV program [24 CFR 982.4(b)]. The term “owner” includes a principal or other interested party [24 CFR 982.453; 24 CFR 982.306(f)], such as a designated agent of the owner.

Owners have numerous responsibilities under the program, including screening and leasing to families, maintaining the dwelling unit, enforcing the lease, and complying with various contractual obligations.

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

The chapter is organized in two parts:

Part I: Owners in the HCV Program. This part discusses the role of an owner in the PHA’s HCV program and highlights key owner rights and responsibilities.

Part II: HAP Contracts. This part explains provisions of the HAP contract and the relationship between the PHA and the owner as expressed in the HAP contract.

For detailed information about HCV program responsibilities and processes, including PHA policies in key areas, owners will need to refer to several other chapters in this plan. Where appropriate, Chapter 13 will reference the other chapters.

PART I. OWNERS IN THE HCV PROGRAM

13-I.A. OWNER RECRUITMENT AND RETENTION [HCV GB, pp. 2-4 to 2-6; HCV Landlord Strategy Guidebook for PHAs]

Education and Outreach

PHAs are responsible for ensuring that very low-income families have access to all types and ranges of affordable housing in the PHA's jurisdiction, particularly housing outside areas of poverty or minority concentration. A critical element in fulfilling this responsibility is for the PHA to ensure that a sufficient number of owners, representing all types and ranges of affordable housing in the PHA's jurisdiction, are willing to participate in the HCV program.

To accomplish this objective, PHAs must identify and recruit new owners to participate in the program. PHAs can provide education and outreach in a variety of ways. Some strategies include hosting or attending events targeted to landlords or affordable housing providers. Education and outreach can include activities like newsletters, presentations, briefings to community groups, one-on-one appointments, or other ways of sharing information or creating relationships between PHAs and owners. The PHA may also provide monetary incentives and reimbursements to encourage participation in the program.

If the PHA will be conducting outreach events, the PHA must ensure that notices and communications during outreach events are provided in a manner that is effective for persons with hearing, visual, and other communications-related disabilities. PHAs must also take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency.

PHA Policy

The PHA will conduct owner outreach to ensure that owners are familiar with the program and its advantages. The PHA will actively recruit property owners with property located outside areas of poverty and minority concentration. These outreach strategies will include:

- Distributing printed material about the program to property owners and managers
- Contacting property owners and managers by phone or in-person
- Holding owner recruitment/information meetings at least once a year
- Participating in community-based organizations comprised of private property and apartment owners and managers
- Developing working relationships with owners, apartment associations, industry investor groups, and real estate brokers associations
- To the extent practical, partnering with and attending events hosted by other area agencies to deliver information about the HCV program

Outreach strategies will be monitored for effectiveness and adapted accordingly.

Retention

In addition to recruiting owners to participate in the HCV program, the PHA must also provide the kind of customer service that will encourage participating owners to remain active in the program.

PHA Policy

All PHA activities that may affect an owner's ability to lease a unit will be processed as rapidly as possible, in order to minimize vacancy losses for owners.

The PHA will provide owners with a handbook that explains the program, including HUD and PHA policies and procedures, in easy-to-understand language. ~~Handbook~~
~~needs editing~~

The PHA will give special attention to helping new owners succeed through activities such as:

- Providing the owner with a designated PHA contact person.

- Coordinating inspection and leasing activities between the PHA, the owner, and the family.

- Initiating telephone contact with the owner to explain the inspection process and providing an inspection booklet and other resource materials about HUD housing quality standards.

- Providing other written information about how the program operates through a landlord handbook, including answers to frequently asked questions.

- Contacting owners via emails or texts to disseminate information.

Additional services may be undertaken on an as-needed basis, and as resources permit.

13-I.B. BASIC HCV PROGRAM REQUIREMENTS

HUD requires the PHA to assist families in their housing search by providing the family with a list of landlords or other parties known to the PHA who may be willing to lease a unit to the family, or to help the family find a unit. Although the PHA cannot maintain a list of owners that are pre-qualified to participate in the program, owners may indicate to the PHA their willingness to lease a unit to an eligible HCV family, or to help the HCV family find a unit [24 CFR 982.301(b)(11)].

PHA Policy

Owners that wish to indicate their willingness to lease a unit to an eligible HCV family or to help the HCV family find a unit must notify the PHA. The PHA will maintain a listing of such owners and provide this listing to the HCV family as part of the informational briefing packet.

When a family approaches an owner to apply for tenancy, the owner is responsible for screening the family and deciding whether to lease to the family, just as the owner would with any potential unassisted tenant. The PHA has no liability or responsibility to the owner or other persons for the family's behavior or suitability for tenancy. See chapters 3 and 9 for more detail on tenant family screening policies and process.

If the owner is willing, the family and the owner must jointly complete a Request for Tenancy Approval (RTA, Form HUD 52517), which constitutes the family's request for assistance in the specified unit, and which documents the owner's willingness to lease to the family and to follow the program's requirements. When submitted to the PHA, this document is the first step in the process of obtaining approval for the family to receive the financial assistance it will need in order to occupy the unit. Also submitted with the RTA is a copy of the owner's proposed dwelling lease, including the HUD-required Tenancy Addendum (Form HUD-52641-A). See Chapter 9 for more detail on request for tenancy approval policies and process.

HUD regulations stipulate requirements for the approval of an assisted tenancy.

The owner must be qualified to participate in the program [24 CFR 982.306]. Some owners are precluded from participating in the program, or from renting to a particular family, either because of their past history with this or another federal housing program, or because of certain conflicts of interest. Owner qualifications are discussed later in this chapter.

The selected unit must be of a type that is eligible for the program [24 CFR 982.305(a)]. Certain types of dwelling units cannot be assisted under the HCV program. Other types may be assisted under certain conditions. See chapter 9 for more detail on unit eligibility policies and process.

The selected unit must meet HUD's National Standards for the Physical Inspection of Real Estate (NSPIRE) and/or equivalent state or local standards approved by HUD pass housing quality standards [24 CFR 982.305(a)(2)]. The PHA will inspect the owner's dwelling unit at least biennially to ensure that the unit continues to meet inspection requirements. See Chapter 8 for a discussion of the NSPIRE inspection standards and policies for inspections at initial lease-up and throughout the family's tenancy.

The selected unit must meet HUD's Housing Quality Standards (HQS) National Standards for the

Physical Inspection of Real Estate (NSPIRE) and/or equivalent state or local standards approved by HUD [24 CFR 982.305(a)]. The PHA will inspect the owner's dwelling unit at least annually biennially to ensure that the unit continues to meet HQS inspection requirements. See Chapter 8 for a discussion of the NSPIRE HQS standards and policies for HQS inspections at initial lease-up and throughout the family's tenancy.

The PHA must determine that the proposed rent for the unit is reasonable [24 CFR 982.305(a)]. The rent must be reasonable in relation to comparable unassisted units in the area and must not be in excess of rents charged by the owner for comparable, unassisted units on the premises. See chapter 8 for a discussion of requirements and policies on rent reasonableness, rent comparability and the rent reasonableness determination process.

At initial lease-up of a unit, if the gross rent exceeds the applicable payment standard, the PHA must ensure that the family share does not exceed 40 percent of the family's monthly adjusted income [24 CFR 982.305(a)]. See chapter 6 for a discussion of the calculation of family income, family share of rent and HAP.

The dwelling lease must comply with all program requirements [24 CFR 982.308]. Owners are encouraged to use their standard leases when renting to an assisted family. The HUD Tenancy Addendum includes the HUD requirements governing the tenancy and must be added word-for-word to the owner's lease. See chapter 9 for a discussion of the dwelling lease and tenancy addendum, including lease terms and provisions.

The PHA and the owner must execute a Housing Assistance Payment (HAP) Contract (Form HUD-52641). The HAP contract format is prescribed by HUD. See chapter 9 for a discussion of the HUD requirements for execution of the HAP contract.

13-I.C. OWNER RESPONSIBILITIES [24 CFR 982.452]

The basic owner responsibilities in the HCV program are outlined in the regulations as follows:

- Complying with all of the owner's obligations under the housing assistance payments (HAP) contract and the lease
- Performing all management and rental functions for the assisted unit, including selecting a voucher-holder to lease the unit, and deciding if the family is suitable for tenancy of the unit
- Maintaining the unit in accordance with the National Standards for the Physical Inspection of Real Estate (NSPIRE) housing quality standards, including performance of ordinary and extraordinary maintenance
- A unit is not in compliance with housing quality standards if the PHA or other inspector authorized by the state or local government determines that the unit has deficiencies based upon an inspection, the agency or inspector notifies the owner in writing of the deficiencies, and the deficiencies are not remedied within the appropriate timeframe
- ~~Maintaining the unit in accordance with the Housing Quality Standards (HQS) National Standards for the Physical Inspection of Real Estate (NSPIRE), including performance of ordinary and extraordinary maintenance~~
- Complying with equal opportunity requirements
- Preparing and furnishing to the PHA information required under the HAP contract
- Collecting the security deposit, the tenant rent, and any charges for unit damage by the family.
- Enforcing tenant obligations under the dwelling lease
- Paying for utilities and services that are not the responsibility of the family as specified in the lease
- Allowing reasonable modifications to a dwelling unit occupied or to be occupied by a disabled person [24 CFR 100.203]
- Complying with the Violence against Women Reauthorization Act of 2013 (VAWA) when screening prospective HCV tenants or terminating the tenancy of an HCV family (see 24 CFR Part 5, Subpart L; 24 CFR 982.310(h)(4); and 24 CFR 982.452(b)(1))

13-I.D. OWNER QUALIFICATIONS

The PHA does not formally approve an owner to participate in the HCV program. However, there are a number of criteria where the PHA may deny approval of an assisted tenancy based on past owner behavior, conflict of interest, or other owner-related issues. No owner has a right to participate in the HCV program [24 CFR 982.306(e)].

Owners Barred from Participation [24 CFR 982.306(a) and (b)]

The PHA must not approve the assisted tenancy if the PHA has been informed that the owner has been debarred, suspended, or subject to a limited denial of participation under 24 CFR part 24. HUD may direct the PHA not to approve a tenancy request if a court or administrative agency has determined that the owner violated the Fair Housing Act or other federal equal opportunity requirements, or if such an action is pending.

Leasing to Relatives [24 CFR 982.306(d), HCV GB p. 11-2]

The PHA must not approve a tenancy if the owner is the parent, child, grandparent, grandchild, sister, or brother of any member of the family. The PHA may make an exception as a reasonable accommodation for a family member with a disability. The owner is required to certify that no such relationship exists. This restriction applies at the time that the family receives assistance under the HCV program for occupancy of a particular unit. Current contracts on behalf of owners and families that are related may continue, but any new leases or contracts for these families may not be approved.

Conflict of Interest [24 CFR 982.161; HCV GB p. 8-19]

The PHA must not approve a tenancy in which any of the following classes of persons has any interest, direct or indirect, during tenure or for one year thereafter:

- Any present or former member or officer of the PHA (except a participant commissioner)
- Any employee of the PHA, or any contractor, subcontractor or agent of the PHA, who formulates policy or who influences decisions with respect to the programs
- Any public official, member of a governing body, or State or local legislator, who exercises functions or responsibilities with respect to the programs
- Any member of the Congress of the United States

Such “covered individual” may not have any direct or indirect interest in the HAP contract or in any benefits or payments under the contract (including the interest of an immediate family member of such covered individual) while such person is a covered individual or for one year thereafter.

Immediate family member means the spouse, parent (including a stepparent), child (including a stepchild), grandparent, grandchild, sister, or brother (including a stepsister or stepbrother) of any covered individual.

HUD may waive the conflict-of-interest requirements, except for members of Congress, for good cause. The PHA must submit a waiver request to the appropriate HUD Field Office for determination.

Any waiver request submitted by the PHA must include the following [HCV Guidebook pp.11-2 and 11-3]:

- Complete statement of the facts of the case;
- Analysis of the specific conflict of interest provision of the HAP contract and justification as to why the provision should be waived;
- Analysis of and statement of consistency with state and local laws. The local HUD office, the PHA, or both parties may conduct this analysis. Where appropriate, an opinion by the state's attorney general should be obtained;
- Opinion by the local HUD office as to whether there would be an appearance of impropriety if the waiver were granted;
- Statement regarding alternative existing housing available for lease under the HCV program or other assisted housing if the waiver is denied;
- If the case involves a hardship for a particular family, statement of the circumstances and discussion of possible alternatives;
- If the case involves a public official or member of the governing body, explanation of his/her duties under state or local law, including reference to any responsibilities involving the HCV program;
- If the case involves employment of a family member by the PHA or assistance under the HCV program for an eligible PHA employee, explanation of the responsibilities and duties of the position, including any related to the HCV program;
- If the case involves an investment on the part of a member, officer, or employee of the PHA, description of the nature of the investment, including disclosure/divestiture plans.

Where the PHA has requested a conflict-of-interest waiver, the PHA may not execute the HAP contract until HUD has made a decision on the waiver request.

PHA Policy

In considering whether to request a conflict of interest waiver from HUD, the PHA will consider certain factors such as consistency of the waiver with state and local laws, the existence of alternative housing available to families, the individual circumstances of a particular family, the specific duties of individuals whose positions present a possible conflict of interest, the nature of any financial investment in the property and plans for disclosure/divestiture, and the possible appearance of impropriety.

Owner Actions That May Result in Disapproval of a Tenancy Request [24 CFR 982.306(c)]

HUD regulations permit the PHA to disapprove a request for tenancy for various actions and inactions of the owner.

If the PHA disapproves a request for tenancy because an owner is not qualified, it may not terminate the HAP contract for any assisted families that are already living in the owner's properties unless the owner has violated the HAP contract for those units [HCV GB p. 11-4].

PHA Policy

The PHA will refuse to approve a request for tenancy if the PHA becomes aware that any of the following are true:

The owner has violated obligations under a HAP contract under Section 8 of the 1937 Act (42 U.S.C. 1437f);

The owner has committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;

The owner has engaged in any drug-related criminal activity or any violent criminal activity;

The owner has a history or practice of non-compliance with the **HQS inspection standards** for units leased under the tenant-based programs, or with applicable housing standards for units leased with project-based Section 8 assistance or leased under any other federal housing program;

The owner has a history or practice of failing to terminate tenancy of tenants of units assisted under Section 8 or any other federally assisted housing program for activity engaged in by the tenant, any member of the household, a guest or another person under the control of any member of the household that:

- (i) Threatens the right to peaceful enjoyment of the premises by other residents;
- (ii) Threatens the health or safety of other residents, of employees of the PHA, or of owner employees or other persons engaged in management of the housing;
- (iii) Threatens the health or safety of, or the right to peaceful enjoyment of their residences, by persons residing in the immediate vicinity of the premises; or
- (iv) Is drug-related criminal activity or violent criminal activity;

The owner has a history or practice of renting units that fail to meet state or local housing codes; or

The owner has not paid state or local real estate taxes, fines, or assessment.

In considering whether to disapprove owners for any of the discretionary reasons listed above, the PHA will consider any mitigating factors. Such factors may include, but are not limited to, the seriousness of the violation in relation to program requirements, the impact on the ability of families to lease units under the program, health and safety of participating families, among others. Upon consideration of such circumstances, the PHA may, on a case-by-case basis, choose to approve an owner.

Legal Ownership of Unit

The following represents PHA policy on legal ownership of a dwelling unit to be assisted under the HCV program.

PHA Policy

The PHA will only enter into a contractual relationship with the legal owner of a qualified unit. No tenancy will be approved without acceptable documentation of legal ownership (e.g., deed of trust, proof of taxes for most recent year).

13-I.E. NON-DISCRIMINATION [HAP Contract – Form HUD-52641]

The owner must not discriminate against any person because of race, color, religion, sex, national origin, age, familial status, or disability, in connection with any actions or responsibilities under the HCV program and the HAP contract with the PHA.

The owner must cooperate with the PHA and with HUD in conducting any equal opportunity compliance reviews and complaint investigations in connection with the HCV program and the HAP contract with the PHA.

See Chapter 2 for a more thorough discussion of Fair Housing and Equal Opportunity requirements in the HCV program.

PART II. HAP CONTRACTS

13-II.A. OVERVIEW

The HAP contract represents a written agreement between the PHA and the owner of the dwelling unit occupied by a HCV assisted family. The contract spells out the owner's responsibilities under the program, as well as the PHA's obligations. Under the HAP contract, the PHA agrees to make housing assistance payments to the owner on behalf of the family approved by the PHA to occupy the unit.

The HAP contract is used for all HCV program tenancies except for assistance under the Section 8 homeownership program, and assistance to families that own a manufactured home and use their assistance to lease the space for the manufactured home. See chapter 15 for a discussion of any special housing types included in the PHA's HCV program.

When the PHA has determined that the unit meets program requirements and the tenancy is approvable, the PHA and owner must execute the HAP contract. See chapter 9 for a discussion of the leasing process, including provisions for execution of the HAP contract.

13-II.B. HAP CONTRACT CONTENTS

The HAP contract format is required by HUD, specifically Housing Assistance Payment (HAP) Contract, Form HUD-52641.

The HAP contract contains three parts.

Part A of the contract includes basic contract information: the names of the tenant and all household members, the address of the contract unit, start and end dates of initial lease term, the amount of initial monthly rent to owner, the amount of initial housing assistance payment, the utilities and appliances to be supplied by owner and tenant, and the signatures of the PHA representative and owner [HCV Guidebook, pp. 11-10 and 11-11].

In general, the HAP contract cannot be modified. However, PHAs do have the discretion to add language to Part A of the HAP contract which prohibits the owner from collecting a security deposit in excess of private market practices or in excess of amounts charged to unassisted tenants. PHA policy on the amount of security deposit an owner may collect is found in Chapter 9.

PHAs also have the discretion to add language to Part A of the HAP contract that defines when the housing assistance payment by the PHA is deemed received by the owner (e.g., upon mailing by the PHA or actual receipt by the owner).

PHA Policy

The PHA has not adopted a policy that defines when the housing assistance payment by the PHA is deemed received by the owner. Therefore, no modifications to the HAP contract will be necessary.

Part B is the body of the contract. It describes in detail program requirements affecting the owner and owner roles and responsibilities under the HCV program. Most of the requirements contained in Part B of the HAP contract are outlined elsewhere in this plan. Topics addressed in Part B include:

- Lease of Contract Unit
- Maintenance, Utilities, and Other Services
- Term of HAP Contract
- Provision and Payment of Utilities and Appliances
- Rent to Owner: Reasonable Rent
- PHA Payment to Owner
- Prohibition of Discrimination
- Owner's Breach of HAP Contract
- PHA and HUD Access to Premises and Owner's Records
- Exclusion of Third Party Rights
- Conflict of Interest
- Assignment of the HAP Contract
- Written Notices
- Entire Agreement Interpretation

Part C of the contract includes the Tenancy Addendum (Form HUD-52641-A). The addendum sets forth the tenancy requirements for the program and the composition of the household, as approved by the PHA. The tenant has the right to enforce the Tenancy Addendum against the owner. The terms of the Tenancy Addendum prevail over any other provisions of the lease.

13-II.C. HAP CONTRACT PAYMENTS

General

During the term of the HAP contract, and subject to the provisions of the HAP contract, the PHA must make monthly HAP payments to the owner on behalf of the family, at the beginning of each month. If a lease term begins after the first of the month, the HAP payment for the first month is prorated for a partial month.

The amount of the HAP payment is determined according to the policies described in Chapter 6 and is subject to change during the term of the HAP contract. The PHA must notify the owner and the family in writing of any changes in the HAP payment.

HAP payments can be made only during the lease term, and only while the family is residing in the unit.

The monthly HAP payment by the PHA is credited toward the monthly rent to owner under the family's lease. The total of the rent paid by the tenant and the HAP payment is equal to the rent to owner as specified in the lease.

The family is not responsible for payment of the HAP payment, and the PHA is not responsible for payment of the family share of rent.

The family's share of the rent cannot be more than the difference between the rent to owner and the HAP payment. The owner may not demand or accept any rent payment from the tenant in excess of this maximum [24 CFR 982.451(b)(4)]. The owner may not charge the tenant extra amounts for items customarily included in rent in the locality or provided at no additional cost to unsubsidized tenants in the premises [24 CFR 982.510(c)]. See chapter 9 for a discussion of separate, non-lease agreements for services, appliances and other items that are not included in the lease.

If the owner receives any excess HAP from the PHA, the excess amount must be returned immediately. If the PHA determines that the owner is not entitled to all or a portion of the HAP, the PHA may deduct the amount of overpayment from any amounts due to the owner, including amounts due under any other Section 8 HCV contract. See Chapter 16 for additional detail on owner reimbursement of HAP overpayments.

Owner Certification of Compliance

Unless the owner complies with all provisions of the HAP contract, the owner is not entitled to receive housing assistance payments under the HAP contract [HAP Contract – Form HUD-52641].

By ~~endorsing~~ **accepting** the monthly check from the PHA, the owner certifies to compliance with the terms of the HAP contract. This includes certification that the owner is maintaining the unit and premises in accordance with ~~NSPIRE~~ housing quality standards ~~This includes certification that the owner is maintaining the unit and premises in accordance with HQS NSPIRE standards;~~ that the contract unit is leased to the tenant family and, to the best of the owner's knowledge, the family resides in the unit as the family's only residence; the rent to owner does not exceed rents charged by the owner for comparable unassisted units on the premises; and that the owner does not receive (other than rent to owner) any additional payments or other consideration for rent of

the contract unit during the HAP term.

Late HAP Payments [24 CFR 982.451(a)(5)]

The PHA is responsible for making HAP payments promptly when due to the owner, in accordance with the terms of the HAP contract. After the first two calendar months of the HAP contract term, the HAP contract provides for late penalties if the PHA fails to make the HAP payment on time.

Penalties for late HAP payments can only be imposed if 1) the penalties are in accordance with generally accepted local rental market practices and law governing penalties for late payment by tenants; 2) it is the owner's normal business practice to charge late payment penalties for both assisted and unassisted families; and 3) the owner charges the assisted family for late payment of the family's share of the rent.

The PHA is not required to pay a late payment penalty if HUD determines that the payment is late for reasons beyond the PHA's control. In addition, late payment penalties are not required if the PHA intentionally delays or denies payment as a remedy to an owner breach of the HAP contract [HCV Guidebook p. 11-7].

Termination of HAP Payments [24 CFR 982.311(b)]

The PHA must continue making housing assistance payments to the owner in accordance with the HAP contract as long as the tenant continues to occupy the unit and the HAP contract is not violated.

HAP payments terminate when the HAP contract terminates or when the tenancy is terminated in accordance with the terms of the lease.

If the owner has initiated eviction proceedings against the family and the family continues to reside in the unit, the PHA must continue to make housing assistance payments to the owner until the owner has obtained a court judgment or other process allowing the owner to evict the tenant.

PHA Policy

The owner must inform the PHA when the owner has initiated eviction proceedings against the family and the family continues to reside in the unit.

The owner must inform the PHA when the owner has obtained a court judgment or other process allowing the owner to evict the tenant and provide the PHA with a copy of such judgment or determination.

After the owner has obtained a court judgment or other process allowing the owner to evict the tenant, the PHA will continue to make HAP payments to the owner until the family actually moves from the unit or until the family is physically evicted from the unit, whichever is earlier. The owner must inform the PHA of the date when the family actually moves from the unit or the family is physically evicted from the unit.

13-II.D. BREACH OF HAP CONTRACT [24 CFR 982.453]

Any of the following actions by the owner constitutes a breach of the HAP contract:

- ~~If the owner violates any obligations under the HAP contract including failure to maintain the unit in accordance with NSPIRE housing quality standards~~
- ~~If the owner violates any obligations under the HAP contract including failure to maintain the unit in accordance with NSPIRE standards HQS~~
- If the owner has violated any obligation under any other HAP contract under Section 8
- If the owner has committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing program
- For projects with mortgages insured by HUD or loans made by HUD, if the owner has failed to comply with the regulation for the applicable program; or if the owner has committed fraud, bribery or any other corrupt or criminal act in connection with the mortgage or loan
- If the owner has engaged in drug-related criminal activity
- If the owner has committed any violent criminal activity

If the PHA determines that a breach of the HAP contract has occurred, it may exercise any of its rights and remedies under the HAP contract.

The PHA rights and remedies against the owner under the HAP contract include recovery of any HAP overpayment, suspension of housing assistance payments, abatement or reduction of the housing assistance payment, termination of the payment or termination of the HAP contract. The PHA may also obtain additional relief by judicial order or action.

The PHA must notify the owner of its determination and provide in writing the reasons for the determination. The notice may require the owner to take corrective action by an established deadline. The PHA must provide the owner with written notice of any reduction in housing assistance payments or the termination of the HAP contract.

PHA Policy

Before the PHA invokes a remedy against an owner, the PHA will evaluate all information and documents available to determine if the contract has been breached.

If relevant, the PHA will conduct an audit of the owner's records pertaining to the tenancy or unit.

If it is determined that the owner has breached the contract, the PHA will consider all of the relevant factors including the seriousness of the breach, the effect on the family, the owner's record of compliance and the number and seriousness of any prior HAP contract violations.

13-II.E. HAP CONTRACT TERM AND TERMINATIONS

The term of the HAP contract runs concurrently with the term of the dwelling lease [24 CFR 982.451(a)(2)], beginning on the first day of the initial term of the lease and terminating on the last day of the term of the lease, including any lease term extensions.

The HAP contract and the housing assistance payments made under the HAP contract terminate if [HCV Guidebook pp.11-4 and 11-5, pg. 15-3]:

- The owner or the family terminates the lease;
- The lease expires;
- The PHA terminates the HAP contract;
- The PHA terminates assistance for the family;
- The family moves from the assisted unit. In this situation, the owner is entitled to keep the housing assistance payment for the month when the family moves out of the unit.
- 180 calendar days have elapsed since the PHA made the last housing assistance payment to the owner;
- The family is absent from the unit for longer than the maximum period permitted by the PHA;
- The Annual Contributions Contract (ACC) between the PHA and HUD expires
- The PHA elects to terminate the HAP contract.

PHA Policy

The PHA may elect to terminate the HAP contract in each of the following situations:

Available program funding is not sufficient to support continued assistance for families in the program [24 CFR 982.454];

The unit does not meet size requirements due to change in family composition [24 CFR 982.403] – see Chapter 8;

The unit does not meet housing quality NSPIRE standards [24 CFR 982.404] – see Chapter 8;

~~The unit does not meet HQS size requirements due to change in family composition [24 CFR 982.403]—see Chapter 8;~~

~~The unit does not meet NSPIRE standards HQS [24 CFR 982.404]—see Chapter 8;~~

The family breaks up [HUD Form 52641] – see Chapter 3;

The owner breaches the HAP contract [24 CFR 982.453(b)] – see Section 13-II.D.

If the PHA terminates the HAP contract, the PHA must give the owner and the family written notice. The notice must specify the reasons for the termination and the effective date of the termination. Once a HAP contract is terminated, no further HAP payments may be made under that contract [HCV Guidebook pg.15-4].

PHA Policy

Generally, ~~In all cases~~, the HAP contract terminates at the end of the calendar month that follows the calendar month in which the PHA gives written notice to the owner.

The PHA cannot make any HAP payment for any month after the month the family vacates the unit.

The owner is not entitled to any housing assistance payment after this period and must return to the PHA any housing assistance payment received after this period.

HAP contract ends the month the single, head of household tenant passes away.

If the family moves from the assisted unit into a new unit, even if the new unit is in the same building or complex as the assisted unit, the HAP contract for the assisted unit terminates. A new HAP contract would be required [HCV GB, p. 11-17].

When the family moves from an assisted unit into a new unit, the term of the HAP contract for the new unit may begin in the same month in which the family moves out of its old unit. This is not considered a duplicative subsidy [HCV GB, p. 8-22].

13-II.F. CHANGE IN OWNERSHIP / ASSIGNMENT OF THE HAP CONTRACT [HUD-52641]

The HAP contract cannot be assigned to a new owner without the prior written consent of the PHA.

An owner under a HAP contract must notify the PHA in writing prior to a change in the legal ownership of the unit. The owner must supply all information as requested by the PHA.

Prior to approval of assignment to a new owner, the new owner must agree to be bound by and comply with the HAP contract. The agreement between the new owner and the former owner must be in writing and in a form that the PHA finds acceptable. The new owner must provide the PHA with a copy of the executed agreement.

PHA Policy

Assignment of the HAP contract will be approved only if the new owner is qualified to become an owner under the HCV program according to the policies in Section 13-I.D. of this chapter.

The PHA must receive a signed, written request from the existing owner stating the name and address of the new HAP payee and the effective date of the assignment in order to change the HAP payee under an outstanding HAP contract.

Within 10 business days of receiving the owner's request, the PHA will inform the current owner in writing whether the assignment may take place.

The new owner must provide a written certification to the PHA that includes:

- A copy of the escrow statement or other document showing the transfer of title and recorded deed;

- A copy of the owner's IRS Form W-9, Request for Taxpayer Identification Number and Certification, or the social security number of the new owner;

- The effective date of the HAP contract assignment;

- A written agreement to comply with the terms of the HAP contract; and

- A certification that the new owner is not a prohibited relative.

If the new owner does not agree to an assignment of the HAP contract, or fails to provide the necessary documents, the PHA will terminate the HAP contract with the old owner. If the new owner wants to offer the family a new lease, and the family elects to stay with continued assistance, the PHA will process the leasing in accordance with the policies in Chapter 9.

13-II.G. FORECLOSURE [Notice PIH 2010-49]

Families receiving HCV assistance are entitled to certain protections set forth under the Protecting Tenants at Foreclosure Act (PTFA). During the term of the lease, the new owner of the property does not have good cause to terminate the tenant's lease, unless the new owner will occupy the unit as their primary residence and has provided the tenant with at least a 90-day notice. In that case, the lease may be terminated effective on the date of sale, although the tenant is still entitled to a 90-day notice to vacate. Further, the new owner assumes interest in the lease between the prior owner and the tenant and to the HAP contract.

Any state or local law that provides longer time periods or other additional protections for tenants also applies.

PHA Policy

If a property is in foreclosure, the PHA will make all reasonable efforts to determine the status of the foreclosure and ownership of the property and will continue to make payments to the original owner until ownership legally transfers in accordance with the HAP contract.

The PHA will attempt to obtain a written acknowledgement of the assignment of the HAP contract from the successor in interest. This will include a request for owner information, including a tax identification number and payment instructions from the new owner. Even if the new owner does not acknowledge the assignment of the HAP contract in writing, the assignment is still effective by operation of law.

The PHA will inform the tenant that they must continue to pay rent in accordance with the lease, and if the new owner refuses to accept payment or cannot be identified, the tenant should pay rent into escrow. Failure to pay rent may constitute an independent ground for eviction.

In the event that the PHA is unable to make HAP payments to the new owner due to an action or inaction by the new owner that prevents such payments (e.g., rejection of payments or failure to maintain the property according to housing quality NSPIRE standards), or due to an inability to identify the new owner, the PHA will either use the funds to pay:

~~In the event that the PHA is unable to make HAP payments to the new owner due to an action or inaction by the new owner that prevents such payments (e.g., rejection of payments or failure to maintain the property according to NSPIRE standards HQS), or due to an inability to identify the new owner, the PHA will either use the funds to pay:~~

The utilities that are the owner's responsibility after taking reasonable steps to notify the owner; except that if the unit has been or will be rendered uninhabitable due to termination or threat of termination of service, prior notice is not required. In the latter case, the PHA shall notify the owner within a reasonable time after making the utility payment; or

For the family's reasonable moving costs, including security deposit costs.

The PHA will also refer the tenant, as needed, to the local legal aid office to ensure adequate protection of the tenant's rights and enforcement of the successor in interest's performance under the HAP contract.

See Section 12-III.B for discussion of foreclosure as it pertains to owner termination of tenancy.

Chapter 14

PROGRAM INTEGRITY

INTRODUCTION

The PHA is committed to ensuring that subsidy funds made available to the PHA are spent in accordance with HUD requirements.

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

This chapter covers HUD and PHA policies designed to prevent, detect, investigate, and resolve instances of program abuse or fraud. It also describes the actions that will be taken in the case of unintentional errors and omissions.

Part I: Preventing, Detecting, and Investigating Errors and Program Abuse. This part presents PHA policies related to preventing, detecting, and investigating errors and program abuse.

Part II: Corrective Measures and Penalties. This part describes the corrective measures the PHA must and may take when errors or program abuses are found.

PART I: PREVENTING, DETECTING, AND INVESTIGATING ERRORS AND PROGRAM ABUSE

14-I.A. PREVENTING ERRORS AND PROGRAM ABUSE

HUD created the Enterprise Income Verification (EIV) system to provide PHAs with a powerful tool for preventing errors and detecting program abuse. PHAs are required to use the EIV system in its entirety in accordance with HUD administrative guidance [24 CFR 5.233]. PHAs are further required to:

- Provide applicants and participants with form HUD-52675, “Debts Owed to PHAs and Terminations”
- Require all adult members of an applicant or participant family to acknowledge receipt of form HUD-52675 by signing a copy of the form for retention in the family file

PHA Policy

To ensure that the PHA’s HCV program is administered according to the highest ethical and legal standards, the PHA will employ a variety of techniques to ensure that both errors and intentional program abuse are rare.

The PHA will discuss program compliance and integrity issues during the voucher briefing sessions described in Chapter 5.

The PHA will provide each applicant and participant with a copy of “Is Fraud Worth It?” (form HUD-1141-OIG), which explains the types of actions a family must avoid and the penalties for program abuse.

The PHA will provide each applicant and participant with a copy of “What You Should Know about EIV,” a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2017-12. In addition, the PHA will require the head of each household to acknowledge receipt of the guide by signing a copy for retention in the family file.

The PHA will place a warning statement about the penalties for fraud (as described in 18 U.S.C. 1001 and 1010) on key PHA forms and form letters that request information from a family or owner.

PHA staff will be required to review and explain the contents of all HUD- and PHA-required forms prior to requesting family member signatures.

At every regular reexamination, PHA staff will explain any changes in HUD regulations or PHA policy that affect program participants.

The PHA will require first-time owners (or their agents) to participate in a briefing session on HAP contract requirements.

The PHA will provide owners with ongoing information about the program, with an emphasis on actions and situations to avoid.

The PHA will provide each PHA employee with the necessary training on program rules and the organization’s standards of conduct and ethics.

For the purposes of this chapter the term *error* refers to an unintentional error or omission. *Program abuse or fraud* refers to a single act or pattern of actions that constitutes a false statement, omission, or concealment of a substantial fact, made with the intent to deceive or mislead.

14-I.B. DETECTING ERRORS AND PROGRAM ABUSE

In addition to taking steps to prevent errors and program abuse, the PHA will use a variety of activities to detect errors and program abuse.

Quality Control and Analysis of Data

Under the Section 8 Management Assessment Program (SEMAP), HUD requires the PHA to review a random sample of tenant records annually to determine if the records conform to program requirements and to conduct quality control inspections of a sample of units to ensure compliance with [applicable housing quality NSPIRE](#) standards [24 CFR, Part 985]. (See Chapter 16 for additional information about SEMAP requirements).

PHA Policy

In addition to the SEMAP quality control requirements, the PHA will employ a variety of methods to detect errors and program abuse.

The PHA routinely will use HUD and other non-HUD sources of up-front income verification. This includes The Work Number and any other private or public databases available to the PHA.

At each annual reexamination, current information provided by the family will be compared to information provided at the last annual reexamination to identify inconsistencies and incomplete information.

The PHA will compare family-reported income and expenditures to detect possible unreported income.

Independent Audits and HUD Monitoring

OMB Circular A-133 requires all PHAs that expend \$500,000 or more in federal awards annually to have an independent audit (IPA). In addition, HUD conducts periodic on-site and automated monitoring of PHA activities and notifies the PHA of errors and potential cases of program abuse.

PHA Policy

The PHA will use the results reported in any IPA or HUD monitoring reports to identify potential program abuses as well as to assess the effectiveness of the PHA's error detection and abuse prevention efforts.

Individual Reporting of Possible Errors and Program Abuse

PHA Policy

The PHA will encourage staff, program participants, and the public to report possible program abuse.

14-I.C. INVESTIGATING ERRORS AND PROGRAM ABUSE

When the PHA Will Investigate

PHA Policy

The PHA will review all referrals, specific allegations, complaints, and tips from any source including other agencies, companies, and individuals, to determine if they warrant investigation. In order for the PHA to investigate, the allegation must contain at least one independently verifiable item of information, such as the name of an employer or the name of an unauthorized household member.

The PHA will investigate when inconsistent or contradictory information is detected through file reviews and the verification process.

Consent to Release of Information [24 CFR 982.516]

The PHA may investigate possible instances of error or abuse using all available PHA and public records. If necessary, the PHA will require HCV families to sign consent forms for the release of additional information.

Analysis and Findings

PHA Policy

The PHA will base its evaluation on a preponderance of the evidence collected during its investigation.

Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence that as a whole shows that the fact sought to be proved is more probable than not. Preponderance of evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

For each investigation the PHA will determine (1) whether an error or program abuse has occurred, (2) whether any amount of money is owed the PHA, and (3) what corrective measures or penalties will be assessed.

Consideration of Remedies

All errors and instances of program abuse must be corrected prospectively. Whether the PHA will enforce other corrective actions and penalties depends upon the nature of the error or program abuse.

PHA Policy

In the case of family-caused errors or program abuse, the PHA will take into consideration (1) the seriousness of the offense and the extent of participation or culpability of individual family members, (2) any special circumstances surrounding the case, (3) any mitigating circumstances related to the disability of a family member, (4) the effects of a particular remedy on family members who were not involved in the offense.

In the case of owner-caused errors or program abuse, the PHA will take into consideration (1) the seriousness of the offense, (2) the length of time since the violation has occurred, and (3) the effects of a particular remedy on family members who were not involved in the offense.

Notice and Appeals

PHA Policy

The PHA will inform the relevant party in writing of its findings and remedies within 10 business days of the conclusion of the investigation. The notice will include (1) a description of the error or program abuse, (2) the basis on which the PHA determined the error or program abuses, (3) the remedies to be employed, and (4) the family's right to appeal the results through the informal review or hearing process, if applicable (see Chapter 16).

PART II: CORRECTIVE MEASURES AND PENALTIES

14-II.A. SUBSIDY UNDER- OR OVERPAYMENTS

A subsidy under- or overpayment includes (1) an incorrect housing assistance payment to the owner, (2) an incorrect family share established for the family, and (3) an incorrect utility reimbursement to a family.

Corrections

Whether the incorrect subsidy determination is an overpayment or underpayment of subsidy, the PHA must promptly correct the HAP, family share, and any utility reimbursement prospectively.

PHA Policy

Increases in the family share will be implemented on the first of the month following a written 30-day notice.

Any decreases in family share will become effective on the first of the month following the discovery of the error.

Reimbursement

Whether the family or owner is required to reimburse the PHA or the PHA is required to make retroactive subsidy payments to the owner or family depends upon which party is responsible for the incorrect subsidy payment and whether the action taken was an error or program abuse. Policies regarding reimbursement are discussed in the three sections that follow.

14-II.B. FAMILY-CAUSED ERRORS AND PROGRAM ABUSE

Family obligations and general administrative requirements for participating in the program are discussed throughout this plan. This section deals specifically with errors and program abuse by family members.

An incorrect subsidy determination caused by a family generally would be the result of incorrect reporting of family composition, income, assets, or expenses, but also would include instances in which the family knowingly allows the PHA to use incorrect information provided by a third party.

Family Reimbursement to PHA [HCV GB pp. 22-12 to 22-13]

PHA Policy

In the case of family-caused errors or program abuse, the family will be required to repay any excess subsidy received. The PHA may, but is not required to, offer the family a repayment agreement in accordance with Chapter 16. If the family fails to repay the excess subsidy, the PHA will terminate the family's assistance in accordance with the policies in Chapter 12.

PHA Reimbursement to Family [HCV GB p. 22-12]

PHA Policy

The PHA will not reimburse the family for any underpayment of assistance when the underpayment clearly is caused by the family.

Prohibited Actions

An applicant or participant in the HCV program must not knowingly:

- Make a false statement to the PHA [Title 18 U.S.C. Section 1001].
- Commit fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program [24 CFR 982.552(c)(iv)].

PHA Policy

Any of the following will be considered evidence of family program abuse:

Payment to the owner in excess of amounts authorized by the PHA for rent, security deposit, and additional services

Offering bribes or illegal gratuities to the PHA Board of Commissioners, employees, contractors, or other PHA representatives

Offering payments or other incentives to the owner or a third party as an inducement for the third party to make false or misleading statements to the PHA on the family's behalf

Use of a false name or the use of falsified, forged, or altered documents

Intentional misreporting of family information or circumstances (e.g. income, family composition)

Omitted facts that were obviously known by a family member (e.g., not reporting employment income)

Admission of program abuse by an adult family member

The PHA may determine other actions to be program abuse based upon a preponderance of the evidence, as defined earlier in this chapter.

Penalties for Program Abuse

In the case of program abuse caused by a family the PHA may, at its discretion, impose any of the following remedies.

- The PHA may require the family to repay excess subsidy amounts paid by the PHA, as described earlier in this section.
- The PHA may require, as a condition of receiving or continuing assistance, that a culpable family member not reside in the unit. See policies in Chapter 3 (for applicants) and Chapter 12 (for participants).
- The PHA may deny or terminate the family's assistance following the policies set forth in Chapter 3 and Chapter 12 respectively.
- The PHA may refer the family for state or federal criminal prosecution as described in section 14-II.E.

14-II.C. OWNER-CAUSED ERROR OR PROGRAM ABUSE

Owner requirements that are part of the regular process of offering, leasing, and maintaining a unit (e.g., [housing quality standards](#)~~NSPIRE~~ compliance, fair housing) are addressed in the appropriate chapters of this plan. This section focuses on errors and program abuse by owners.

An incorrect subsidy determination caused by an owner generally would be the result of an incorrect owner statement about the characteristics of the assisted unit (e.g., the number of bedrooms, which utilities are paid by the family). It also includes accepting duplicate housing assistance payments for the same unit in the same month, or after a family no longer resides in the unit.

Owner Reimbursement to the PHA

In all cases of overpayment of subsidy caused by the owner, the owner must repay to the PHA any excess subsidy received. The PHA may recover overpaid amounts by withholding housing assistance payments due for subsequent months, or if the debt is large, the PHA may allow the owner to pay in installments over a period of time [HCV GB p. 22-13].

PHA Policy

In cases where the owner has received an excess subsidy, the PHA will require the owner to repay the amount owed in accordance with the policies in Section 16-IV.B.

Prohibited Owner Actions

An owner participating in the HCV program must not:

- Make any false statement to the PHA [Title 18 U.S.C. Section 1001].
- Commit fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program [24 CFR 982.453(a)(3)] including:

PHA Policy

Any of the following will be considered evidence of owner program abuse:

Charging the family rent above or below the amount specified by the PHA

Charging a security deposit other than that specified in the family's lease

Charging the family for services that are provided to unassisted tenants at no extra charge

Knowingly accepting housing assistance payments for any month(s) after the family has vacated the unit

Knowingly accepting incorrect or excess housing assistance payments

Offering bribes or illegal gratuities to the PHA Board of Commissioners, employees, contractors, or other PHA representatives

Offering payments or other incentives to an HCV family as an inducement for the family to make false or misleading statements to the PHA

Residing in the unit with an assisted family

Committing sexual or other harassment, either quid pro quo or hostile environment, based on the protected classes defined in Chapter 2

Retaliating against any applicant or participant reporting/alleging sexual or other harassment, either quid pro quo or hostile environment, based on the protected classes defined in Chapter 2

Remedies and Penalties

When the PHA determines that the owner has committed program abuse, the PHA may take any of the following actions:

- Require the owner to repay excess housing assistance payments, as discussed earlier in this section and in accordance with the policies in Chapter 16.
- Terminate the HAP contract (See Chapter 13).
- Bar the owner from future participation in any PHA programs.
- Refer the case to state or federal officials for criminal prosecution as described in section 14-II.E.

14-II.D. PHA-CAUSED ERRORS OR PROGRAM ABUSE

The responsibilities and expectations of PHA staff with respect to normal program administration are discussed throughout this plan. This section specifically addresses actions of a PHA staff member that are considered errors or program abuse related to the HCV program. Additional standards of conduct may be provided in the PHA personnel policy.

PHA-caused incorrect subsidy determinations include (1) failing to correctly apply HCV rules regarding family composition, income, assets, and expenses, (2) assigning the incorrect voucher size to a family, and (3) errors in calculation.

De Minimis Errors [24 CFR 5.609(c)(4)]

The PHA will not be considered out of compliance when making annual income determinations solely due to de minimis errors in calculating family income. A de minimis error is an error where the PHA determination of family income deviates from the correct income determination by no more than \$30 per month in monthly adjusted income (\$360 in annual adjusted income) per family.

PHAs must take corrective action to credit or repay a family if the family was overcharged rent, including when PHAs make de minimis errors in the income determination. Families will not be required to repay the PHA in instances where the PHA miscalculated income resulting in a family being undercharged for rent. PHAs state in their policies how they will repay or credit a family for the amount they were overcharged as a result of the PHAs de minimis error in income determination.

PHA Policy

The PHA will reimburse a family for any family overpayment of rent, regardless of whether the overpayment was the result of staff-caused error, staff program abuse, or a de minimis error.

~~Repayment to the PHA~~

~~Neither a family nor an owner is required to repay an overpayment of subsidy if the error or program abuse is caused by PHA staff [HCV GB. 22-12].~~

~~PHA Reimbursement to Family or Owner~~

~~The PHA must reimburse a family for any underpayment of subsidy, regardless of whether the underpayment was the result of staff-caused error or staff or owner program abuse. Funds for this reimbursement must come from the PHA's administrative fee reserves [HCV GB p. 22-12].~~

Prohibited Activities

PHA Policy

Any of the following will be considered evidence of program abuse by PHA staff:

Failing to comply with any HCV program requirements for personal gain

Failing to comply with any HCV program requirements as a result of a conflict-of-interest relationship with any applicant, participant, or owner

Seeking or accepting anything of material value from applicants, participating families, vendors, owners, contractors, or other persons who provide services or materials to the PHA

Disclosing confidential or proprietary information to outside parties

Gaining profit as a result of insider knowledge of PHA activities, policies, or practices

Misappropriating or misusing HCV funds

Destroying, concealing, removing, or inappropriately using any records related to the HCV program

Committing any other corrupt or criminal act in connection with any federal housing program

14-II.E. CRIMINAL PROSECUTION

PHA Policy

When the PHA determines that program abuse by an owner, family, or PHA staff member has occurred and the amount of overpaid subsidy meets or exceeds the threshold for prosecution under local or state law, the PHA will refer the matter to the appropriate entity for prosecution. When the amount of overpaid assistance meets or exceeds the federal threshold, the case will also be referred to the HUD Office of Inspector General (OIG).

Other criminal violations related to the HCV program will be referred to the appropriate local, state, or federal entity.

14-II.F. FRAUD AND PROGRAM ABUSE RECOVERIES

The PHA may retain a portion of program fraud losses that the PHA recovers from a family or owner through litigation, court order, or a repayment agreement [24 CFR 982.163].

The PHA must be the principal party initiating or sustaining the action to recover amounts due from tenants that are due as a result of fraud and abuse. 24 CFR 792.202 permits the PHA to retain the greater of:

- 50 percent of the amount it actually collects from a judgment, litigation (including settlement of a lawsuit) or an administrative repayment agreement, or
- Reasonable and necessary costs that the PHA incurs related to the collection including costs of investigation, legal fees, and agency collection fees.

The family must be afforded the opportunity for an informal hearing in accordance with requirements in 24 CFR 982.555.

If HUD incurs costs on behalf of the PHA related to the collection, these costs must be deducted from the amount retained by the PHA.

Chapter 15

SPECIAL HOUSING TYPES

[24 CFR 982 Subpart M]

INTRODUCTION

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

The PHA may permit a family to use any of the special housing types discussed in this chapter. However, the PHA is not required to permit families receiving assistance in its jurisdiction to use these housing types, except that PHAs must permit use of any special housing type if needed as reasonable accommodation for a person with a disability. The PHA also may limit the number of families who receive HCV assistance in these housing types and cannot require families to use a particular housing type. No special funding is provided for special housing types. **Unless specifically modified by the regulations, housing quality standards apply to special housing types (Single Room Occupancy, Congregate Housing, Group Homes, Shared Housing, Manufactured Homes, Homeownership units) [Notice PIH 2023-28].**

PHA Policy

Families will be able to utilize the following special housing types:

- Homeownership
- VASH
- Manufactured Homes

The PHA may approve additional special housing types, **if needed as reasonable accommodation so that the program is readily accessible to a person with disabilities.**

~~Families will not be permitted to use any special housing types, unless use is needed as a reasonable accommodation so that the program is readily accessible to a person with disabilities.~~

Special housing types include single room occupancy (SRO), congregate housing, group homes, shared housing, cooperative housing, manufactured homes where the family owns the home and leases the space, and homeownership [24 CFR 982.601]. **A single unit cannot be designated as more than one type of special housing. The PHA cannot give preferences to households that wish to live in any of these types of housing and cannot require households to select any of these types of housing [New HCV GB, *Special Housing Types*, p.3].**

This chapter consists of the following seven parts. Each part contains a description of the housing type, and any special requirements associated with it. Except as modified by this chapter, the general requirements of the HCV program apply to special housing types.

Part I: Single Room Occupancy

Part II: Congregate Housing

Part III: Group Homes

Part IV: Shared Housing

Part V: Cooperative Housing

Part VI: Manufactured Homes (including manufactured home space rental)

Part VII: Homeownership

PART I: SINGLE ROOM OCCUPANCY

[24 CFR 982.602 through 982.605; Form HUD-52641; New HCV GB, Special Housing Types, p.4]

15-I.A. OVERVIEW

A single room occupancy (SRO) unit provides living and sleeping space for the exclusive use of the occupant but requires the occupant to share sanitary and/or food preparation facilities with others. More than one person may not occupy an SRO unit. HCV regulations do not limit the number of units in an SRO facility, but the size of a facility may be limited by local ordinances.

When providing HCV assistance in an SRO unit, a separate lease and HAP contract are executed for each assisted person, and the standard form of the HAP contract is used (form HUD-52641) with the special housing type specified in Part A of the HAP contract, as follows: “This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Single room occupancy (SRO) housing.”

15-I.B. PAYMENT STANDARD, UTILITY ALLOWANCE, AND HAP CALCULATION

The payment standard for SRO housing is 75 percent of the zero-bedroom payment standard amount on the PHA’s payment standard schedule.

The utility allowance for an assisted person residing in SRO housing is 75 percent of the zero-bedroom utility allowance.

The HAP for an assisted occupant in an SRO facility is the lower of the SRO payment standard amount minus the TTP or the gross rent for the unit minus the TTP.

15-I.C. ~~SRO: HOUSING QUALITY STANDARDS [24 CFR 982.605(a)] NATIONAL STANDARDS FOR THE PHYSICAL INSPECTION OF REAL ESTATE (NSPIRE)~~

~~NSPIRE~~ Housing quality standards requirements described in the applicable portions of Chapter 8 apply to SRO housing except that sanitary facilities, and space and security characteristics must meet local code standards for SRO housing. In the absence of applicable local code standards for SRO housing, the following standards apply:

- *Access*: Access doors to the SRO unit must have working locks for privacy. The occupant must be able to access the unit without going through any other unit. Each unit must have immediate access to two or more approved means of exit from the building, appropriately marked and leading to safe and open space at ground level. The SRO unit must also have any other means of exit required by State or local law.
- *Fire Safety*: All SRO facilities must have a sprinkler system that protects major spaces. “Major spaces” are defined as hallways, common areas, and any other areas specified in local fire, building, or safety codes. SROs must also have hard-wired smoke detectors, and any other fire and safety equipment required by state or local law.

Sanitary facilities and space and security standards must meet local code requirements for SRO housing. In the absence of local code standards, the requirements discussed below apply [24 CFR 982.605].

- *Sanitary Facilities:* At least one flush toilet that can be used in privacy, a lavatory basin, and a bathtub or shower in proper operating condition must be provided for each six persons (or fewer) residing in the SRO facility. If the SRO units are leased only to men, flush urinals may be substituted for up to one half of the required number of toilets. Sanitary facilities must be reasonably accessible from a common hall or **passageway to all persons sharing them and may not be located more than one floor above or below the SRO unit**. They may not be located below grade unless the SRO units are located on that level.
- *Space and Security:* An SRO unit must contain at least 110 square feet of floor space, and at least four-square feet of closet space with an unobstructed height of at least five feet, for use by the occupant. If the closet space is less than four square feet, the habitable floor space in the SRO unit must be increased by the amount of deficiency. Exterior doors and windows accessible from outside the SRO unit must be lockable.

For SRO housing, 24 CFR 5.703(d) only applies to the extent that the SRO unit contains the room or facility referenced in 24 CFR 5.703(d). Because no children live in SRO housing, the housing quality-standards applicable to lead-based paint do not apply.

PART II: CONGREGATE HOUSING

[24 CFR 982.606 through 982.609; **Form HUD-52641; New HCV GB, *Special Housing Types*, p.6]**

15-II.A. OVERVIEW

Congregate housing is intended for use by elderly persons or persons with disabilities. A congregate housing facility contains a shared central kitchen and dining area and a private living area for the individual household that includes at least a living room, bedroom and bathroom. Food service for residents must be provided.

If approved by the PHA, a family member or live-in aide may reside with the elderly person or person with disabilities. The PHA must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

When providing HCV assistance in congregate housing, a separate lease and HAP contract are executed for each assisted family. The standard form of the HAP contract is used (**Form HUD-52641**) with the special housing type specified in Part A of the HAP contract, as follows: “This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Congregate housing.”

15-II.B. PAYMENT STANDARD, UTILITY ALLOWANCE, AND HAP CALCULATION

The payment standard for an individual unit in a congregate housing facility is based on the number of rooms in the private living area **for the assisted family**. If there is only one room in the unit (not including the bathroom or the kitchen, if a kitchen is provided), the PHA must use the payment standard for a zero-bedroom unit. If the unit has two or more rooms (other than the bathroom and the kitchen), the PHA must use the one-bedroom payment standard.

The HAP for an assisted occupant in a congregate housing facility is the lower of the applicable payment standard minus the TTP or the gross rent for the unit minus the TTP.

The gross rent for the unit for the purpose of calculating HCV assistance is the shelter portion (including utilities) of the resident's monthly housing expense only. The residents' costs for food service should not be included in the rent for a congregate housing unit.

15-II.C. CONGREGATE: HOUSING QUALITY STANDARDS

~~NSPIRE Housing quality standards~~ requirements as described in Chapter 8 apply to congregate housing except for the requirements stated below. Congregate housing is not subject to the requirement that the dwelling unit must have a kitchen area. In place of the ~~NSPIRE housing quality standards~~ related to food preparation and refuse disposal, congregate housing must have a refrigerator of appropriate size in the private living area of each resident, a central kitchen and dining facilities located within the premises and accessible to the residents, and food service for the residents, that is not provided by the residents themselves.

The congregate housing must contain adequate facilities and services for the sanitary disposal of food waste and refuse, including facilities for temporary storage where necessary.

The housing quality standards applicable to lead-based paint do not apply unless a child under the age of six is expected to reside in the unit.

PART III: GROUP HOME

[24 CFR 982.610 through 982.614; ~~Form HUD-52641; New HCV GB, Special Housing Types, p.8] and HCV-GB p. 7-4]~~

15-III.A. OVERVIEW

A group home is a state-approved (licensed, certified, or otherwise approved in writing by the state) facility intended for occupancy by elderly persons and/or persons with disabilities. Except for live-in aides, all persons living in a group home, whether assisted or not, must be elderly persons or persons with disabilities. Persons living in a group home must not require continuous medical or nursing care.

A group home consists of bedrooms for residents, which can be shared by no more than two people, and a living room, kitchen, dining area, bathroom, and other appropriate social, recreational, or community space that may be shared with other residents. No more than 12 persons may reside in a group home including assisted and unassisted residents and any live-in aides.

If approved by the PHA, a live-in aide may live in the group home with a person with disabilities. The PHA must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

When providing HCV assistance in a group home, a separate lease and HAP contract is executed for each assisted family. The standard form of the HAP contract is used (~~form HUD-52641~~) with the special housing type specified in Part A of the HAP contract, as follows: “This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Group Home.”

15-III.B. PAYMENT STANDARD, UTILITY ALLOWANCE, AND HAP CALCULATION

Unless there is a live-in aide, the family unit size (~~voucher size~~) for an assisted occupant of a group home must be zero- or one-bedroom. ~~depending on the PHA's subsidy standard.~~ If there is a live-in aide, the aide must be counted in determining the household's unit size.

The payment standard used to calculate the HAP is the lower of the payment standard for the family unit size or the pro rata share of the payment standard for the group home size. The pro rata share is calculated by dividing the number of persons in the assisted household by the number of persons (assisted and unassisted) living in the group home. ~~The number of persons in the assisted household equals one assisted person plus any PHA-approved live-in aide.~~

The HAP for an assisted occupant in a group home is the lower of the payment standard minus the TTP or the gross rent minus the TTP.

The utility allowance for an assisted occupant in a group home is the pro rata share of the utility allowance for the group home.

The rents paid for participants residing in group homes are subject to generally applicable standards for rent reasonableness. The rent for an assisted person must not exceed the pro rata portion of the reasonable rent for the group home. In determining reasonable rent, the PHA should consider whether sanitary facilities and facilities for food preparation and service are common facilities or private facilities.

**15-III.C. ~~15-III.C. GROUP HOME: HOUSING QUALITY STANDARDS~~NATIONAL STANDARDS
FOR THE PHYSICAL INSPECTION OF REAL ESTATE (NSPIRE)**

The entire unit must comply with housing quality~~NSPIRE~~ requirements described in Chapter 8, except for the standards that relate to sanitary facilities, food preparation and refuse disposal, space and security, structure and materials, and site and neighborhood ~~and as~~ stated below.

- *Sanitary Facilities:* A group home must have at least one bathroom in the facility, with a flush toilet that can be used in privacy, a fixed basin with hot and cold running water, and a shower or bathtub with hot and cold running water. A group home may contain private or common bathrooms. However, no more than four residents can be required to share a bathroom.
- *Food Preparation and Service:* Group home units must contain a kitchen and dining area with adequate space to store, prepare, and serve food. The facilities for food preparation and service may be private or may be shared by the residents. The kitchen must contain a range, an oven, a refrigerator, and a sink with hot and cold running water. The sink must drain into an approvable public or private disposal system.
- *Space and Security:* Group homes must contain at least one bedroom of appropriate size for every two people, and a living room, kitchen, dining area, bathroom, and other appropriate social, recreational, or community space that may be shared with other residents. **Doors and windows accessible from outside the unit must be lockable.**
- *Structure and Material:* To avoid any threat to the health and safety of the residents, group homes must be structurally sound. Elevators must be in good condition. Group homes must be accessible to and usable by residents with disabilities.
- *Site and Neighborhood:* Group homes must be located in a residential setting. The site and neighborhood should be reasonably free from **disturbing noises and reverberations**, and other hazards to the health, safety, and general welfare of the residents, and should not be subject to serious adverse conditions, such as:
 - Dangerous walks or steps
 - Instability
 - Flooding, poor drainage
 - Septic tank back-ups - Sewage hazards
 - Mud slides
 - Abnormal air pollution
 - Smoke or dust
 - Excessive noise
 - Vibrations or vehicular traffic
 - Excessive accumulations of trash
 - Vermin or rodent infestation, and
 - Fire hazards.

The housing quality standards applicable to lead-based paint do not apply **unless a child under the age of six is expected to reside in the unit.**

PART IV: SHARED HOUSING

[24 CFR 982.615 through 982.618; Form HUD 52641;
Notice PIH 2021-05; New HCV GB, Special Housing Types, p.11]

15-IV.A. OVERVIEW

Families in markets with tight rental conditions or with a prevalence of single-family housing may determine a shared housing living arrangement to be a useful way to secure affordable housing. PHAs offering shared housing as a housing solution may also experience some reduction in the average per-unit-cost (PUC) paid on behalf of satisfied families.

Shared housing is a single housing unit occupied by an assisted family and another resident or residents. **The unit may be a house or an apartment.** The shared unit consists of both common space for use by the occupants of the unit and separate private space for each assisted family.

An assisted family may share a unit with other persons assisted under the HCV program or with other unassisted persons. The owner of a shared housing unit may reside in the unit, but housing assistance may not be paid on behalf of the owner. The resident owner may not be related by blood or marriage to the assisted family.

Shared housing may be offered in a number of ways, including for-profit co-living (such as a boarding house, single bedroom with a common living room/kitchen/dining room) run by a private company [Notice PIH 2021-05].

The owner of a shared housing unit may reside in the unit, but housing assistance may not be paid on behalf of the owner. The resident owner may not be related by blood or marriage to the assisted family.

If approved by the PHA, a live-in aide may reside with the family to care for a person with disabilities. The PHA must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

When shared housing is offered as a housing option, HUD encourages PHAs to consider ways in which the families may be assisted in finding shared housing, including for-profit shared housing matching (such as roommates or single-family homes) and online sites that charge a fee for their matching services, or nonprofit shared housing matching services. HUD further encourages PHAs to include information about this housing possibility in the family's voucher briefing.

~~When providing HCV assistance in shared housing, a separate lease and HAP contract are executed for each assisted family, and the standard form of the HAP contract is used.~~

PHA Policy

The PHA will provide information to families regarding the shared housing option, including a listing to families of any known for-profit or nonprofit shared housing matching services in the community at briefing, and upon request. Families will be advised they can conduct their own internet search. Families will be cautioned to not enter into any rental agreement or pay any deposit or rental payment until the tenancy is approved by the PHA.

PHAs should be aware of potential local legal barriers to HCV participants using shared housing, which can create additional obstacles for shared housing:

- Municipalities may have occupancy limits for the number of unrelated persons who may share a housing unit
- Local zoning codes for single family housing may restrict occupancy in certain areas to households whose family members are related by blood

PHAs should work with local jurisdictions to find solutions that encourage affordable housing and are consistent with the Fair Housing Act, Title VI, and other federal, state, and local fair housing laws. PHAs should inform HUD if they encounter barriers to shared housing that may conflict with fair housing laws.

PHA Policy

The PHA will work with local jurisdictions as necessary to identify solutions consistent with fair housing laws and will inform HUD if the PHA encounters barriers to shared housing that conflict with fair housing laws

When providing HCV assistance in shared housing, a separate lease and HAP contract are executed for each assisted family. The standard form of the HAP contract is used (form HUD-52641) with the special housing type specified in Part A of the HAP contract, as follows: “This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Shared housing.”

15-IV.B. PAYMENT STANDARD, UTILITY ALLOWANCE AND HAP CALCULATION

The payment standard for a family in shared housing is the lower of the payment standard for the family unit size or the pro rata share of the payment standard for the shared housing unit size.

The pro rata share is calculated by dividing the number of bedrooms available for occupancy by the assisted family in the private space by the total number of bedrooms in the unit.

Example: Family holds a two-bedroom voucher

Shared housing unit size: bedrooms available to assisted family = 2

Total bedrooms in the unit: 3

2 Bedrooms for the assisted family

÷ 3 Bedrooms in the unit

.667 pro rata share

2 BR payment standard \$1200

3 BR payment standard: \$1695 $\$1695 \times .667$ (pro rata share) = \$1131

\$1131 is lower than the \$1200 payment standard for the 2 BR family unit size \$1131 is the payment standard used to calculate the HAP

The HAP for a family in shared housing is the lower of the payment standard minus the TTP or the gross rent minus the TTP.

The utility allowance for an assisted family living in shared housing is the ~~lower of the utility allowance for the family unit size (voucher size) or the~~ pro rata share of the utility allowance for the shared housing unit.

Example: A family holds a 2-bedroom voucher. The family decides to occupy 3 out of 4 bedrooms available in the unit.

The utility allowance for a 4-bedroom unit equals \$200

The utility allowance for a 2-bedroom unit equals \$100

The pro rata share of the utility allowance is \$150 (3/4 of \$200)

The PHA will use the 2-bedroom utility allowance of \$100.

The rents paid for families living in shared housing are subject to generally applicable standards for rent reasonableness. The rent paid to the owner for the assisted family must not exceed the pro-rata portion of the reasonable rent for the shared unit. In determining reasonable rent, the PHA should consider whether sanitary and food preparation areas are private or shared.

15-IV.C. SHARED HOUSING: HOUSING QUALITY STANDARDS

The PHA may not give approval to reside in shared housing unless the entire unit, including the portion of the unit available for use by the assisted family under its lease, meets the housing quality standards.

Housing quality standards~~NSPIRE~~ requirements described in Chapter 8 apply to shared housing except for the requirements stated below.

- *Facilities Available for the Family*: Facilities available to the assisted family, whether shared or private, must include a living room, a bathroom, and food preparation and refuse disposal facilities.
- *Space and Security*: The entire unit must provide adequate space and security for all assisted and unassisted residents. The private space for each assisted family must contain at least one bedroom for each two persons in the family. The number of bedrooms in the private space of an assisted family must not be less than the family unit size. A zero-bedroom or one-bedroom unit may not be used for shared housing.

PART V: COOPERATIVE HOUSING

[24 CFR 982.619; **New HCV GB, Special Housing Types, p.14**]

15-V.A. OVERVIEW

This part applies to rental assistance for a cooperative member residing in cooperative housing. It does not apply to assistance for a cooperative member who has purchased membership under the HCV homeownership option, or to rental assistance for a family that leases a cooperative housing unit from a cooperative member.

A cooperative is a form of ownership (nonprofit corporation or association) in which the residents purchase memberships in the ownership entity. Rather than being charged “rent” a cooperative member is charged a “carrying charge.” The monthly carrying charge includes the member’s share of the cooperative debt service, operating expenses, and necessary payments to cooperative reserve funds. It does not include down payments or other payments to purchase the cooperative unit or to amortize a loan made to the family for this purpose.

The occupancy agreement or lease and other appropriate documents must provide that the monthly carrying charge is subject to Section 8 limitations on rent to the owner, and the rent must be reasonable as compared to comparable unassisted units.

When providing HCV assistance in cooperative housing, the standard form of the HAP contract is used with the special housing type specified in Part A of the HAP contract, as follows: “This HAP contract is used for the following special housing type under HUD regulations for the Section 8 voucher program: Cooperative housing.”

15-V.B. PAYMENT STANDARD, UTILITY ALLOWANCE AND HAP CALCULATION

The payment standard & utility allowance determined according to regular HCV program requirements.

The HAP for a cooperative housing unit is the lower of the payment standard minus the TTP or the gross rent (monthly carrying charge for the unit, plus any utility allowance) minus the TTP. The monthly carrying charge includes the member’s share of the cooperative debt service, operating expenses, and necessary payments to cooperative reserve funds. The carrying charge does not include down payments or other payments to purchase the cooperative unit or to amortize a loan made to the family for this purpose.

15-V.C. COOPERATIVE: HOUSING QUALITY STANDARDS

All housing quality standard ~~NSPIRE~~-requirements apply to cooperative housing units. There are no additional ~~NSPIRE~~-requirements. The PHA remedies described in 24 CFR 982.404 do not apply. Rather, if the unit and premises are not maintained in accordance with ~~NSPIRE~~-housing quality standards, the PHA may exercise all available remedies regardless of whether the family or cooperative is responsible for the breach of ~~NSPIRE~~-housing quality standards.

No housing assistance payment can be made unless unit meets ~~NSPIRE~~-housing quality standards and the defect is corrected within the period as specified by the PHA and the PHA verifies correction (see Chapter 8).

In addition to regular ~~NSPIRE~~-deficiencies, breaches of ~~NSPIRE~~-housing quality standards by the family include failure to perform any maintenance for which the family is responsible in accordance

with the terms of the cooperative occupancy agreement [HCV GB].

PART VI: MANUFACTURED HOMES

[24 CFR 982.620 through 982.624; FR Notice 1/18/17; *New HCV GB, Special Housing Types, p.15;*]

15-VI.A. OVERVIEW

A manufactured home is a manufactured structure, transportable in one or more parts, that is built on a permanent chassis, and designed for use as a principal place of residence. HCV-assisted families may occupy manufactured homes in two different ways.

- (1) A family ~~may~~ choose to rent a manufactured home already installed on a space and the PHA must permit it. In this instance program rules are the same as when a family rents any other residential housing, except that there are special housing quality NSPIRE requirements as provided in 15-VI.D. below.
- (2) A family can purchase a manufactured home under the Housing Choice Voucher Homeownership program.
- (3) HUD also permits an otherwise eligible family that owns a manufactured home to rent a space for the manufactured home and receive HCV assistance with the rent for the space as well as certain other housing expenses. PHAs may, but are not required to, provide assistance for such families.

15-VI.B. SPECIAL REQUIREMENTS POLICIES FOR MANUFACTURED HOMEOWNERS WHO LEASE A SPACE

Family Income

In determining the annual income of families leasing manufactured home spaces, the value of the family's equity in the manufactured home in which the family resides is not counted as a family asset.

Lease and HAP Contract

There is a separate Tenancy Addendum (Form 52642-a) and separate HAP Contract (Form 52642) for this special housing type.

15-VLC. PAYMENT STANDARD, UTILITY ALLOWANCE AND HAP CALCULATION [FR Notice 1/18/17]

Payment Standards

The PHA payment standard for manufactured homes is determined in accordance with 24 CFR 982.505 and is the payment standard used for the PHA's HCV program. It is based on the applicable FMR for the area in which the manufactured home space is located.

The payment standard for the family is the lower of the family unit size (voucher size) or the payment standard for the number of bedrooms in the manufactured home.

Utility Allowance

The PHA must establish utility allowances for manufactured home space rental. For the first 12 months of the initial lease term only, the allowance must include an amount for a utility hook-up charge if the family actually incurred a hook-up charge because of a move. This allowance will not be given to a family that leases in place. Utility allowances for manufactured home space must not include the costs of digging a well or installing a septic system.

Space Rent

The rent for the manufactured home space (including other eligible housing expenses) is the total of:

- The rent charged for the manufactured home space;
- Owner maintenance and management charges for the space;
- The monthly payments made by the family to amortize the cost of purchasing the manufactured home, including any required insurance and property taxes; and
- The applicable allowance for tenant-paid utilities.

Amortization Costs

The monthly payment made by the family to amortize the cost of purchasing the manufactured home is the debt service established at the time of application to a lender for financing the purchase of the manufactured home if monthly payments are still being made. Any increase in debt service due to refinancing after purchase of the home may not be included in the amortization cost. Debt service for set-up charges incurred by a family may be included in the monthly amortization payments made by the family. In addition, set-up charges incurred before the family became an assisted family may be included in the amortization cost if monthly payments are still being made to amortize the charges.

Housing Assistance Payment

The HAP for a manufactured home space under the housing choice voucher program is the lower of the payment standard minus the TTP or the manufactured home space rent (including other eligible housing expenses) minus the TTP.

Eligible Housing Expenses [24 CFR 982.623(b)]

The family's eligible housing expenses are the total of:

- The rent charged by the owner for the manufactured home space.
- Charges for the maintenance and management the space owner must provide under the lease.
- The monthly payments made by the family to amortize the cost of purchasing the manufactured home established at the time of application to a lender for financing the purchase of the manufactured home if monthly payments are still being made, including any required insurance and property taxes included in the loan payment to the lender.
- Any increase in debt service or term due to refinancing after purchase of the home may not be included in the amortization cost.
- Debt service for installation charges incurred by a family may be included in the monthly amortization payments. Installation charges incurred before the family became an assisted family may be included in the amortization cost if monthly payments are still being made to amortize the charges.
 - The applicable allowances for tenant-paid utilities, as determined under 24 CFR 982.517 and 982.624.

Rent Reasonableness [24 CFR 982.622(b)]

During the assisted tenancy, the rent to owner for the manufactured home space may not exceed a reasonable rent. Initially, and at least annually thereafter, the PHA must determine that the rent for the manufactured home space is reasonable based on rents for comparable manufactured home spaces. The PHA must consider the location and size of the space, and any services and maintenance to be provided by the owner in accordance with the lease (without a fee in addition to rent). By accepting the monthly housing assistance payment, the owner of the manufactured home space certifies that the rent does not exceed rents charged by the owner for comparable unassisted spaces in the same manufactured home park or elsewhere.

If requested by the PHA, the owner must give the PHA information on rents charged by the owner for other manufactured home spaces.

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15-VI.D. MANUFACTURED HOMES: HOUSING QUALITY STANDARDS~~NATIONAL STANDARDS FOR THE PHYSICAL INSPECTION OF REAL ESTATE (NSPIRE)~~ [24 CFR 982.621]

Under either type of occupancy described in 15-VI.A. above, the manufactured home must meet all housing quality standards~~NSPIRE~~ performance requirements and acceptability criteria discussed in Chapter 8 of this plan. In addition, the following requirements ~~applies~~apply:

Performance Requirement: ~~Manufactured Home Tie-Down~~

A manufactured home must be placed on the site in a stable manner and must be free from hazards such as sliding or wind damage.

***Acceptability Criteria:** ~~The home must be securely anchored by a tie-down device that distributes and transfers the loads imposed by the unit to appropriate ground anchors to resist overturning and sliding~~*

Manufactured Home Tie-Down

~~A manufactured home must be placed on the site in a stable manner and must be free from hazards such as sliding or wind damage. The home must be securely anchored by a tie-down device that distributes and transfers the loads imposed by the unit to appropriate ground anchors to resist overturning and sliding.~~

PART VII: HOMEOWNERSHIP

[24 CFR 982.625 through 982.643]

15-VII.A. OVERVIEW [24 CFR 982.625]

The homeownership option is used to assist a family residing in a home purchased and owned by one or more members of the family. A family assisted under this option may be newly admitted or an existing participant in the HCV program. The PHA must have the capacity to operate a successful HCV homeownership program as defined by the regulations.

PHA Policy

The PHA has instituted a minimum homeowner down payment requirement of at least three percent of the purchase price and requires that at least one percent of the purchase price come from the family's personal resources. However, the downpayment requirements can be altered on a case-by-case basis – especially when dealing with outside agencies such as Habitat for Humanity.

There are two forms of homeownership assistance described in the regulations: monthly homeownership assistance payments and single down payment assistance grants. However, PHAs may not offer down payment assistance until and unless funding is allocated by Congress. Since this has not yet happened, only monthly homeownership assistance may be offered.

PHA Policy

The PHA will offer monthly homeownership assistance payments to qualified families.

The PHA may choose not to offer ownership assistance. However, the PHA must offer homeownership assistance if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities. It is the sole responsibility of the PHA to determine whether it is reasonable to implement a homeownership program as a reasonable accommodation. The PHA must determine what is reasonable based on the specific circumstances and individual needs of the person with a disability. The PHA may determine that it is not reasonable to offer homeownership assistance as reasonable accommodation in cases where the PHA has otherwise opted not to implement a homeownership program.

The PHA must approve a live-in aide if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

15-VII.B. FAMILY ELIGIBILITY [24 CFR 982.627]

If the PHA offers the homeownership option, participation by the family is optional. However, the family must meet all of the requirements listed below before the commencement of homeownership assistance. The PHA may also establish additional initial requirements as long as they are described in the PHA administrative plan.

- The family must have been admitted to the Housing Choice Voucher program.
- The family must qualify as a first-time homeowner or may be a cooperative member.
- The family must meet the Federal minimum income requirement. The family must have a gross annual income equal to the Federal minimum wage multiplied by 2000, based on the income of adult family members who will own the home. The PHA may establish a higher income standard for families. However, a family that meets the federal minimum income requirement (but not the PHA's requirement) will be considered to meet the minimum income requirement if it can demonstrate that it has been pre-qualified or pre-approved for financing that is sufficient to purchase an eligible unit.

PHA Policy

The PHA will not establish a higher minimum income standard for disabled and/or non-disabled families.

- For disabled families, the minimum income requirement is equal to the current SSI monthly payment for an individual living alone, multiplied by 12.
- For elderly or disabled families, welfare assistance payments for adult family members who will own the home will be included in determining whether the family meets the minimum income requirement. It will not be included for other families.
- The family must satisfy the employment requirements by demonstrating that one or more adult members of the family who will own the home at commencement of homeownership assistance is currently employed on a full-time basis (the term '*full-time employment*' means not less than an average of 30 hours per week); and has been continuously so employed during the year before commencement of homeownership assistance for the family.

PHA Policy

Families will be considered "continuously employed" if the break in employment does not exceed four months.

The PHA will count self-employment in a business when determining whether the family meets the employment requirement.

- The employment requirement does not apply to elderly and disabled families. In addition, if a family, other than an elderly or disabled family includes a person with disabilities, the PHA must grant an exemption from the employment requirement if the PHA determines that it is needed as a reasonable accommodation.
- The family has not defaulted on a mortgage securing debt to purchase a home under the homeownership option.

- Except for cooperative members who have acquired cooperative membership shares prior to commencement of homeownership assistance, no family member has a present ownership interest in a residence at the commencement of homeownership assistance for the purchase of any home.
- Except for cooperative members who have acquired cooperative membership shares prior to the commencement of homeownership assistance, the family has entered into a contract of sale in accordance with 24 CFR 982.631(c).

PHA Policy

The PHA will impose additional eligibility requirements. To be eligible to participate in the homeownership option, families must meet the following criteria:

The family has had no family-caused violations of HUD's Housing Quality Standards within the past year.

The family is not within the initial one-year period of a HAP Contract.

The family owes no money to the PHA.

The family has not committed any serious or repeated violations of a PHA-assisted lease within the past year.

15-VII.C. SELECTION OF FAMILIES [24 CFR 982.626]

Unless otherwise provided (under the homeownership option), the PHA may limit homeownership assistance to families or purposes defined by the PHA and may prescribe additional requirements for commencement of homeownership assistance for a family. Any such limits or additional requirements must be described in the PHA administrative plan.

If the PHA limits the number of families that may participate in the homeownership option, the PHA must establish a system by which to select families to participate.

PHA Policy

At present, there is no threshold for the number of new homeownership units the PHA will administer per year. The PHA may offer homeownership assistance if it is necessary as a reasonable accommodation for a person with a disability. The PHA may reduce the number of homeownership units offered in subsequent years, if necessary.

Families who have been participating in the PHA's Family Self-Sufficiency program for at least six months, or have graduated from the FSS program, will be given preference over other families. Elderly and disabled families will automatically be given this preference.

Within preference and non-preference categories, families will be selected according to the date and time of their application for participation in the homeownership option is submitted to the PHA.

All families must meet eligibility requirements as defined in Section 15-VII.B. of this plan.

15-VII.D. ELIGIBLE UNITS [24 CFR 982.628]

In order for a unit to be eligible, the PHA must determine that the unit satisfies all of the following requirements:

- The unit must meet HUD's "eligible housing" requirements. The unit may not be any of the following:
 - A public housing or Indian housing unit;
 - A unit receiving Section 8 project-based assistance;
 - A nursing home, board and care home, or facility providing continual psychiatric, medical or nursing services;
 - A college or other school dormitory;
 - On the grounds of penal, reformatory, medical, mental, or similar public or private institutions.
- ~~The unit must be under construction or already exist at the time the family enters into the contract of sale.~~
- The unit must be a one-unit property or a single dwelling unit in a cooperative or condominium.
- The unit must have been inspected by the PHA and by an independent inspector designated

by the family.

- The unit must meet hHousing qQuality sStandards (see Chapter 8).
- For a unit where the family will not own fee title to the real property (such as a manufactured home), the home must have a permanent foundation, and the family must have the right to occupy the site for at least 40 years.

Families may enter contracts of sale for units not yet under construction. However, the PHA will not commence homeownership assistance for the family for that unit until:

1. Either the responsible entity completed the environmental review as required by 24 CFR part 58 and HUD approved the environmental certification and request for release of funds prior to commencement of construction or HUD performed an environmental review under CFR part 50 and notified the PHA in writing of environmental approval of the site prior to construction commencement; and
2. Construction of the unit has been completed and the unit has passed the required NSPIRE inspection and independent inspection as addressed elsewhere in this chapter.
 - For PHA-owned units all of the following conditions must be satisfied.
 - The PHA informs the family, both orally and in writing, that the family has the right to purchase any eligible unit and a PHA-owned unit is freely selected by the family without PHA pressure or steering;
 - The unit is not ineligible housing:

~~The PHA obtains the services of an independent agency entity (as defined in 24 CFR 982.4) to inspect the unit for compliance with NSPIRE standards, review the independent inspection report, review the contract of sale, and determine the reasonableness of the sales price and any PHA provided financing. All of these actions must be completed in accordance with program requirements.~~

The PHA must not approve the unit if the PHA has been informed that the seller is debarred, suspended, or subject to a limited denial of participation.

15-VII.E. ADDITIONAL PHA REQUIREMENTS FOR SEARCH AND PURCHASE [24 CFR 982.629]

It is the family's responsibility to find a home that meets the criteria for voucher homeownership assistance. The PHA may establish the maximum time that will be allowed for a family to locate and purchase a home and may require the family to report on their progress in finding and purchasing a home. If the family is unable to purchase a home within the maximum time established by the PHA, the PHA may issue the family a voucher to lease a unit or place the family's name on the waiting list for a voucher.

PHA Policy

Due to the limited housing market, there are no time constraints placed on the family to locate and complete the purchase of a home under the homeownership option.

During the period it takes to identify a unit and close on a home, the family will continue to receive HCV rental assistance in accordance with any applicable lease and HAP contract until the family vacates the rental unit for its purchased home.

The family will be required to report their progress on locating and purchasing a home to the PHA every 30 days until the home is purchased.

15-VII.F. HOMEOWNERSHIP COUNSELING [24 CFR 982.630]

Before commencement of homeownership assistance for a family, the family must attend and satisfactorily complete the pre-assistance homeownership and housing counseling program required by the PHA. HUD suggests the following topics for the PHA-required pre-assistance counseling:

- Home maintenance (including care of the grounds);
- Budgeting and money management;
- Credit counseling;
- How to negotiate the purchase price of a home;
- How to obtain homeownership financing and loan pre-approvals, including a description of types of financing that may be available, and the pros and cons of different types of financing;
- How to find a home, including information about homeownership opportunities, schools, and transportation in the PHA jurisdiction;
- Advantages of purchasing a home in an area that does not have a high concentration of low-income families and how to locate homes in such areas;
- Information on fair housing, including fair housing lending and local fair housing enforcement agencies; and
- Information about the Real Estate Settlement Procedures Act (12 U.S.C. 2601 et seq.) (RESPA), state and Federal truth-in-lending laws, and how to identify and avoid loans with oppressive terms and conditions.

The PHA may adapt the subjects covered in pre-assistance counseling (as listed) to local circumstances and the needs of individual families.

The PHA may also offer additional counseling after commencement of homeownership assistance (ongoing counseling). If the PHA offers a program of ongoing counseling for participants in the homeownership option, the PHA shall have discretion to determine whether the family is required to participate in the ongoing counseling.

If the PHA does not use a HUD-approved housing counseling agency to provide the counseling, the PHA should ensure that its counseling program is consistent with the counseling provided under HUD's Housing Counseling program.

PHA Policy

Families will not be required to participate in ongoing counseling after commencement of homeownership assistance.

15-VII.G. HOME INSPECTIONS, CONTRACT OF SALE, AND PHA DISAPPROVAL OF SELLER [24 CFR 982.631]

Home Inspections

The PHA may not commence monthly homeownership assistance payments for a family until the PHA has inspected the unit and has determined that the unit ~~passes NSPIRE~~meets -housing quality standards. .

PHA Policy

When the family locates a home they wish to purchase and submits a copy of their purchase offer/contract, the PHA will conduct an ~~NSPIRE~~ inspection within 10 business days. Any items found not to meet ~~NSPIRE~~housing quality standards must be repaired before the unit can be determined eligible for the homeownership program.

An independent professional inspector selected by and paid for by the family must also inspect the unit. The independent inspection must cover major building systems and components, including foundation and structure, housing interior and exterior, and the roofing, plumbing, electrical, and heating systems. The independent inspector must be qualified to report on property conditions, including major building systems and components.

The PHA may not require the family to use an independent inspector selected by the PHA. The independent inspector may not be a PHA employee or contractor, or other person under control of the PHA. However, the PHA may establish standards for qualification of inspectors selected by families under the homeownership option.

PHA Policy

The family must hire an independent professional inspector, whose report must be submitted to the PHA for review. This inspector must be a member of the American Society of Home Inspectors (ASHI) or other recognized professional society, or a licensed engineer. The inspector cannot be a PHA employee or contractor.

The PHA may disapprove a unit for assistance based on information in the independent inspector's report, even if the unit was found to comply with housing quality standards.

PHA Policy

The PHA will review the professional report in a timely fashion and, based on the presence of major physical problems, may disapprove the purchase of the home.

If the PHA disapproves of the purchase of a home, the family will be notified in writing of the reasons for the disapproval.

While the family is receiving homeownership assistance, the PHA will not conduct an inspection while the family is receiving homeownership assistance.

The family may choose to purchase the home despite the PHA's advice.

Contract of Sale

Before commencement of monthly homeownership assistance payments, a member or members of the family must enter into a contract of sale with the seller of the unit to be acquired by the family. The family must give the PHA a copy of the contract of sale. The contract of sale must:

- Specify the price and other terms of sale by the seller to the purchaser;
- Provide that the purchaser will arrange for a pre-purchase inspection of the dwelling unit by an independent inspector selected by the purchaser;
- Provide that the purchaser is not obligated to purchase the unit unless the inspection is satisfactory to the purchaser;
- Provide that the purchaser is not obligated to pay for any necessary repairs; and
- Contain a certification from the seller that the seller has not been debarred, suspended, or subject to a limited denial of participation under CFR part 24.
- A contract for the sale of a unit not yet under construction must meet all above requirements and the requirements below. Commencement of construction in violation of the below requirements voids the purchase contract.
 - The purchase is not obligated to purchase the unit unless an environmental review has been performed and the site received environmental approval prior to commencement of construction in accordance with 24 CFR 982.628; and
 - The construction will not commence until the environmental review has been completed and the seller has received written notice from the PHA that environmental approval has been obtained. Environmental approval may be conditioned on the contracting parties, agreement in modification to the unit design or to mitigation actions.

Disapproval of a Seller

In its administrative discretion, the PHA may deny approval of a seller for the same reasons a PHA may disapprove an owner under the regular HCV program [see 24 CFR 982.306(c)].

15-VII.H. FINANCING [24 CFR 982.632]

The PHA may establish requirements for financing purchase of a home under the homeownership option. This may include requirements concerning qualification of lenders, terms of financing, restrictions concerning debt secured by the home, lender qualifications, loan terms, and affordability of the debt. The PHA must establish policies describing these requirements in the administrative plan.

A PHA may not require that families acquire financing from one or more specified lenders, thereby restricting the family's ability to secure favorable financing terms.

PHA Policy

As a check against predatory lending, the PHA will review the financing of each purchase transaction, including estimated closing costs. The PHA will review the loans for features, such as balloon payments, adjustable-rate mortgages, and unusually high interest rates, all of which are prohibited. The PHA also will not approve "seller financing" or "owner-held" mortgages. Beyond these basic criteria, the PHA will rely on the lenders to determine that the loan will be affordable to program participants.

The mortgage the family applies for must require a minimum down payment of at least three percent of the sales price with one percent of the down payment coming from the purchaser's personal funds. The PHA will not require that the family have any more than the minimum of one percent of their own money in the transaction. However, in cases where a lender is requiring a larger amount, the family may be held to the underwriting guidelines set by their lending institution. It is important to note that the down payment requirements will be handled on a case-by-case basis.

The PHA will approve a family's request to utilize its Family Self-Sufficiency escrow account after final disbursement for down payment and/or closing costs when purchasing a unit under the HCV homeownership option.

15-VII.I. CONTINUED ASSISTANCE REQUIREMENTS; FAMILY OBLIGATIONS [24 CFR 982.633]

Homeownership assistance may only be paid while the family is residing in the home. If the family moves out of the home, the PHA may not continue homeownership assistance after the month when the family moves out. The family or lender is not required to refund to the PHA the homeownership assistance for the month when the family moves out.

Before commencement of homeownership assistance, the family must execute a statement of family obligations in the form prescribed by HUD [form HUD-52649]. In the statement, ~~in~~ which the family agrees to comply with all family obligations under the homeownership option.

The family must comply with the following obligations:

- The family must comply with the terms of the mortgage securing debt incurred to purchase the home, or any refinancing of such debt.
- The family may not convey or transfer ownership of the home, except for purposes of financing, refinancing, or pending settlement of the estate of a deceased family member. Use and occupancy of the home are subject to 24 CFR 982.551 (h) and (i).
- The family must supply information to the PHA or HUD as specified in 24 CFR 982.551(b). The family must further supply any information required by the PHA or HUD concerning mortgage financing or refinancing, sale or transfer of any interest in the home, or homeownership expenses.
- The family must notify the PHA before moving out of the home.
- The family must notify the PHA if the family defaults on the mortgage used to purchase the home.
- The family must provide the PHA with information on any satisfaction or payment of the mortgage debt.
- No family member may have any ownership interest in any other residential property.
- The family must comply with the obligations of a participant family described in 24 CFR 982.551, except for the following provisions which do not apply to assistance under the homeownership option: 24 CFR 982.551(c), (d), (e), (f), (g) and (j).

PHA Policy

The PHA does not require any inspections of the home after the initial inspection.

15-VII.J. MAXIMUM TERM OF HOMEOWNER ASSISTANCE [24 CFR 982.634]

Except in the case of a family that qualifies as an elderly or disabled family, other family members (described below) shall not receive homeownership assistance for more than:

- Fifteen years, if the initial mortgage incurred to finance purchase of the home has a term of 20 years or longer; or
- Ten years, in all other cases.

The maximum term described above applies to any member of the family who:

- Has an ownership interest in the unit during the time that homeownership payments are made; or
- Is the spouse of any member of the household who has an ownership interest in the unit during the time homeownership payments are made.

In the case of an elderly family, the exception only applies if the family qualifies as an elderly family at the start of homeownership assistance. In the case of a disabled family, the exception applies if at any time during receipt of homeownership assistance the family qualifies as a disabled family.

If, during the course of homeownership assistance, the family ceases to qualify as a disabled or elderly family, the maximum term becomes applicable from the date homeownership assistance commenced. However, such a family must be provided at least 6 months of homeownership assistance after the maximum term becomes applicable (provided the family is otherwise eligible to receive homeownership assistance).

If the family has received such assistance for different homes, or from different PHAs, the total of such assistance terms is subject to the maximum term described in this part.

15-VII.K. HOMEOWNERSHIP ASSISTANCE PAYMENTS AND HOMEOWNERSHIP EXPENSES [24 CFR 982.635]

Monthly homeownership assistance payment is lower of: voucher payment standard minus total tenant payment, or the monthly homeownership expenses minus the total tenant payment.

In determining the amount of the homeownership assistance payment, the PHA will use the same payment standard schedule, payment standard amounts, and subsidy standards as those described elsewhere in this plan for the Housing Choice Voucher program. The payment standard for a family is the greater of (i) The payment standard as determined at the commencement of homeownership assistance for occupancy of the home, or (ii) The payment standard at the most recent regular reexamination of family income and composition since the commencement of homeownership assistance for occupancy of the home.

~~The PHA may pay the homeownership assistance payments directly to the family, or at the PHA's discretion, to a lender on behalf of the family. If the assistance payment exceeds the amount due to the lender, the PHA must pay the excess directly to the family.~~

~~Homeownership assistance for a family terminates automatically 180 calendar days after the last homeownership assistance payment on behalf of the family. However, a PHA may grant relief from this requirement in those cases where automatic termination would result in extreme hardship for the family.~~

The PHA must adopt policies for determining the amount of homeownership expenses to be allowed by the PHA in accordance with HUD requirements.

Homeownership expenses (not including cooperatives) only include amounts allowed by the PHA to cover:

- Principal and interest on initial mortgage debt, any refinancing of such debt, and any mortgage insurance premium incurred to finance purchase of the home;
- Real estate taxes and public assessments on the home;
- Home insurance;
- The PHA allowance for maintenance expenses;
- The PHA allowance for costs of major repairs and replacements;
- The PHA utility allowance for the home;
- Principal and interest on mortgage debt incurred to finance costs for major repairs, replacements or improvements for the home. If a member of the family is a person with disabilities, such debt may include debt incurred by the family to finance costs needed to make the home accessible for such person, if the PHA determines that allowance of such costs as homeownership expenses is needed as a reasonable accommodation so that the homeownership option is readily accessible to and usable by such person;
- Land lease payments where a family does not own fee title to the real property on which the home is located; [see 24 CFR 982.628(b)].
- For a condominium unit, condominium operating charges or maintenance fees are assessed by the condominium homeowner association.

~~The PHA does not have the discretion to exclude any of the listed homeownership expenses or to add any additional items.~~

Homeownership expenses for a cooperative member may only include amounts allowed by the PHA to cover:

- The cooperative charge under the cooperative occupancy agreement including payment for real estate taxes and public assessments on the home;
- Principal and interest on initial debt incurred to finance purchase of cooperative membership shares and any refinancing of such debt;
- Home insurance;
- The PHA allowance for maintenance expenses;
- The PHA allowance for costs of major repairs and replacements;
- The PHA utility allowance for the home; and
- Principal and interest on debt incurred to finance major repairs, replacements or improvements for the home. If a member of the family is a person with disabilities, such debt may include debt incurred by the family to finance costs needed to make the home accessible for such person, if the PHA determines that allowance of such costs as homeownership expenses is needed as a reasonable accommodation so that the homeownership option is readily accessible to and usable by such person.
- Cooperative operating charges or maintenance fees assessed by the cooperative homeowner association.

PHA Policy

The PHA will use the following amounts for homeownership expenses:

Monthly homeownership payment. This includes principal and interest on initial mortgage debt, taxes and insurance, any any mortgage insurance premium, if applicable.

Utility allowance. The PHA's utility allowance for the unit, based on the current HCV utility allowance schedule.

Monthly maintenance repair/replacement allowance. A single monthly maintenance/repair/replacement allowance will be provided at \$100 per month

Monthly co-op/condominium assessments. If applicable, the monthly amount of co-op or condominium association operation and maintenance assessments.

Monthly principal and interest on debt for improvements. Principal and interest for major home repair, replacements or improvements, if applicable.

Homeowner Association dues.

The PHA may pay the homeownership assistance payments directly to the family, or at the PHA's discretion, to a lender on behalf of the family. If the assistance payment exceeds the amount due to the lender, the PHA must pay the excess directly to the family.

PHA Policy

The PHA's housing assistance payment will be paid directly to the lender.

15-VII.L. PORTABILITY [24 CFR 982.636, 982.637, 982.353(b) and (c), 982.552, 982.553]

Subject to the restrictions on portability included in HUD regulations and PHA policies, a family may exercise portability if the receiving PHA is administering a voucher homeownership program and accepting new homeownership families. The receiving PHA may absorb the family into its voucher program or bill the initial PHA.

The family must attend the briefing and counseling sessions required by the receiving PHA. The receiving PHA will determine whether the financing for, and the physical condition of the unit, are acceptable. The receiving PHA must promptly notify the initial PHA if the family has purchased an eligible unit under the program, or if the family is unable to purchase a home within the maximum time established by the PHA.

15-VII.M. MOVING WITH CONTINUED ASSISTANCE [24 CFR 982.637]

A family receiving homeownership assistance may move with continued tenant-based assistance **or with voucher homeownership assistance.**

The PHA must determine that all initial requirements have been satisfied if a family that has received homeownership assistance wants to move with continued homeownership assistance. However, the following do not apply:

- **The requirement that a family must be a first-time homeowner is not applicable**
- **The requirement for pre-assistance counseling is not applicable. However, the PHA may require that the family complete additional counseling (before or after moving to a new unit with continued homeownership assistance).**

Continued tenant-based assistance for a new unit cannot begin so long as any family member holds title to the prior home. However, when the family or a member of the family is or has been the victim of domestic violence, dating violence, sexual assault, stalking or human trafficking, and the move is needed to protect the health or safety of the family or family member (or any family members has been the victim of sexual assault that occurred on the premises during the 90-calendar-day period preceding the family's request to move), such family or family member may be assisted with continued tenant-based assistance even if they own any title or other interest in the prior home.

The PHA may deny permission to move to a new unit with continued voucher assistance:

- **If the PHA has insufficient funding to provide continued assistance.**
- **In accordance with 24 CFR 982.638, regarding denial or termination of assistance.**
- **In accordance with the PHA's policy regarding number of moves within a 12-month period.**

The PHA must deny the family permission to move to a new unit with continued voucher rental assistance if:

- The family defaulted on an FHA-insured mortgage; and
- The family fails to demonstrate that the family has conveyed, or will convey, title to the home, as required by HUD, to HUD or HUD's designee; and
- The family has moved, or will move, from the home within the period established or approved by HUD.

PHA Policy

For families participating in the homeownership option, requests to move must involve the family selling their home. If after selling their home, the family wishes to purchase another home, through the homeownership program, that is permitted. However, if the family receives such assistance for different homes, or from different PHAs, the total of such assistance terms is subject to the maximum term described in Section 15-VII.J. Maximum Term of Homeowner Assistance.

If the family sells their home purchased under the homeownership program and wishes to reenter the PHA Housing Choice Voucher program, then they can do so, if they qualify.

The PHA will not require additional counseling of any families who move with continued assistance.

15-VII.N. DENIAL OR TERMINATION OF ASSISTANCE [24 CFR 982.638]

At any time, the PHA may deny or terminate homeownership assistance in accordance with HCV program requirements in 24 CFR 982.552 (Grounds for denial or termination of assistance) or 24 CFR 982.553 (Crime by family members).

The PHA may also deny or terminate assistance for violation of participant obligations described in 24 CFR Parts 982.551 or 982.633 and in accordance with its own policy, with the exception of failure to meet obligations under the Family Self-Sufficiency program as prohibited under the alternative requirements set forth in FR Notice 12/29/14.

Homeownership assistance for a family terminates automatically 180 calendar days after the last homeownership assistance payment on behalf of the family. However, a PHA may grant relief from this requirement in those cases where automatic termination would result in extreme hardship for the family.

PHA Policy

In order for the PHA to consider granting relief from the requirement to automatically terminate homeownership assistance 180 days following the PHA's last housing assistance payment on behalf of the family, the family must submit a request to the PHA at least 30 days prior to the date of automatic termination. The request must include an explanation of the circumstances that will cause extreme hardship for the family (e.g., the imminent loss of income or employment) as well as documentation supporting the request. The PHA will determine on a case-by-case basis whether to grant relief from the requirement and for what period. In no

case will the PHA postpone termination beyond an additional 90 days.

The PHA must terminate voucher homeownership assistance for any member of family receiving homeownership assistance that is dispossessed from the home pursuant to a judgment or order of foreclosure on any mortgage (whether FHA insured or non-FHA) securing debt incurred to purchase the home, or any refinancing of such debt.

PHA Policy

The PHA will terminate a family's homeownership assistance if the family violates any of the homeowner obligations listed in Section 1, as well as for any of the reasons listed in Section 2 of form HUD-52649, Statement of Homeowner Obligations Housing Choice Homeownership Voucher Program.

In making its decision to terminate homeownership assistance, the PHA will consider alternatives as described in Section 12-11.C and other factors described in Section 12-II.D. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate assistance.

Termination notices will be sent in accordance with the requirements and policies set forth in Section 12-II.F.

Chapter 16

ADMINISTRATION

This chapter discusses administrative policies and practices that are relevant to the activities covered in this plan. The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

The policies are discussed in seven parts as described below:

Part I: Administrative Fee Reserve. This part describes the PHA's policies with regard to oversight of expenditures from its administrative fee reserve.

Part II: Setting Program Standards and Schedules. This part describes what payment standards are, and how they are updated, as well as how utility allowances are established and revised.

Part III: Informal Reviews and Hearings. This part outlines the requirements and procedures for informal reviews and hearings, and for informal hearings regarding citizenship status.

Part IV: Owner or Family Debts to the PHA. This part describes policies for recovery of monies that the PHA has overpaid on behalf of families, or to owners, and describes the circumstances under which the PHA will offer repayment agreements to owners and families. Also discussed are the consequences for failure to make payments in accordance with a repayment agreement.

Part V: Section 8 Management Assessment Program (SEMAP). This part describes what the SEMAP scores represent, how they are established, and how those scores affect a PHA.

Part VI: Record-Keeping. All aspects of the program involve certain types of record-keeping. This part outlines the privacy rights of applicants and participants and record retention policies the PHA will follow.

Part VII: Reporting and Record Keeping for Children with Elevated Blood Lead Level. This part describes the PHA's responsibilities for reporting, data collection, and record keeping relative to children with elevated blood lead levels that are less than six years of age, and are receiving HCV assistance.

Part VIII: Determination of Insufficient Funding. This part describes the PHA's policies for determining if there is sufficient funding to issue vouchers, to approve moves to higher cost units or areas, and to continue assistance for all participant families.

Part IX: Violence against Women Act (VAWA): Notification, Documentation, Confidentiality. This part contains key terms used in VAWA and describes requirements related to notifying families and owners about their rights and responsibilities under VAWA; requesting documentation from victims of domestic violence, dating violence, sexual assault, and stalking; and maintaining the confidentiality of information obtained from victims.

PART I: ADMINISTRATIVE FEE RESERVE [24 CFR 982.155]

The PHA will maintain administrative fee reserves, or unrestricted net position (UNP) for the program to pay program administrative expenses more than administrative fees paid by HUD for a PHA fiscal year. HUD appropriations act beginning with FFY 2004 have specified that administrative fee funding may be used only for activities related to the provision of HCV assistance, including related development activities. Notice PIH 2012-9 cites two examples of related development activities: unit modification for accessibility purposes and development of project-based voucher units. The notice makes clear that other activities may also qualify as related development activities. Administrative fees that remain in the UNP account from funding provided prior to 2004 may be used for “other housing purposes permitted by state and local law,” in accordance with 24 CFR 982.155(b)(1).

In addition, as specified in Notice PIH 2022-18, PHAs may use administrative fee funding for both administrative and “other expenses” needed to employ strategies and undertake activities beyond regular administrative responsible to facilitate the successful leasing and use of housing choice vouchers by families, such as through the use of security deposit assistance and landlord recruitment and incentive payments, among other allowable expenses specified in the notice. PHAs are also permitted to use UNP for these expenses [Notice PIH 2022-18].

If a PHA has not adequately administered its HCV program, HUD may prohibit use of funds in the UNP Account and may direct the PHA to use funds in that account to improve administration of the program, for HCV HAP expenses, or to reimburse ineligible expenses in accordance with the regulation at 24 CFR 982.155(b)(3).

HUD requires the PHA Board of Commissioners or other authorized officials to establish the maximum amount that may be charged against the UNP account without specific approval.

PHA Policy

Expenditures from the UNP account will be made in accordance with all applicable federal requirements. Expenditures will not exceed \$10,000 per occurrence without the prior approval of the PHA’s Board of Commissioners.

PART II: SETTING PROGRAM STANDARDS AND SCHEDULES

16-II.A. OVERVIEW

Although many of the program's requirements are established centrally by HUD, the HCV program's regulations recognize that some flexibility is required to allow the PHA to adapt the program to local conditions. This part discusses how the PHA establishes and updates certain schedules and standards that are used to administer the program locally. Details about how these schedules are applied to individual families are provided in other chapters. The schedules and standards discussed here include:

- *Payment Standards*, which dictate the maximum subsidy a family can receive (application of the payment standards is discussed in Chapter 6); and
- *Utility Allowances*, which specify how a family's payment should be adjusted to account for tenant-paid utilities (application of utility allowances is discussed in Chapter 6).

PHA Policy

Copies of the payment standard and utility allowance schedules are available for review in the PHA's offices during normal business hours.

Families, owners, and members of the public may submit written comments on the schedules discussed in this part, at any time, for consideration during the next revision cycle.

The PHA will maintain documentation to support its annual review of payment standards and utility allowance schedules. This documentation will be retained for at least 3 years.

Establishing and updating the PHA passbook rate, which is used to calculate imputed income from assets, is covered in Chapter 6 (see Section 6-I.G.).

16-II.B. PAYMENT STANDARDS [24 CFR 982.503; HCV GB, Chapter 7; and Notice PIH 2024-34]

The payment standard sets the maximum subsidy payment a family can receive from the PHA each month [24 CFR 982.505(a)]. Payment standards are based on fair market rents (FMRs) published annually by HUD. FMRs are set at a percentile within the rent distribution of standard quality rental housing units in each FMR area. For most jurisdictions FMRs are set at the 40th percentile of gross rents in the market area.

In the HCV program, the FMR may be established at the ZIP code level, metropolitan market area level, or nonmetropolitan county level. Within each FMR area, the applicable FMR is the HUD-published:

- Small Area FMR (SAFMR);
 - For any metropolitan area designated as an SAFMR area; or
 - Anywhere a PHA has notified HUD it will voluntarily use SAFMRs;
- Metropolitan FMR for any other metropolitan area; or
- FMR for any other non-metropolitan county.

The PHA must establish a payment standard schedule that establishes payment standard amounts for each FMR area within the PHA's jurisdiction and for each unit size within each of the FMR areas. In many cases a single FMR area will cover the PHA's entire jurisdiction. Some PHAs' jurisdictions include more than one FMR area. The PHA's established payment standards within the payment standard area always must be within the basic range of the applicable FMR area, or any HUD-approved exception payment standard. Program regulations and this policy refer to the "applicable FMR." The "applicable FMR" is the HUD-published SAFMR for PHAs in mandatory SAFMR areas or for those PHAs that have opted-in to using the SAFMR, both of which are discussed below.

Small Area FMR PHAs (Mandatory and Opt-In) [Notice PIH 2018-01; Notice PIH 2023-32; Notice PIH 2024-34; and Implementing Small Area Fair Market Rents (SAFMR) Guidebook]

SAFMRs are FMRs calculated at the ZIP Code level, rather than for an entire metropolitan or non-metropolitan county.

HUD identifies which metropolitan areas are required to use SAFMRs based on significant voucher concentration challenges and market conditions. PHAs administering the HCV program in those areas are required to use the SAFMRs when establishing payment standards (mandatory SAFMR PHAs). Mandatory SAFMR PHAs must use the SAFMR for any part of their jurisdiction located in the SAFMR area. Upon notification to HUD, PHAs not located in mandatory SAFMR areas may opt-in and voluntarily adopt SAFMRs for one or more of the FMR areas in which the PHA administers vouchers (opt-in PHAs). A PHA that exercises this option in one metropolitan area or non-metropolitan county is not required to exercise this option in other metropolitan areas or non-metropolitan counties. A PHA that opts in to SAFMRs may subsequently opt out through revision of the administrative plan and notification to HUD.

Alternatively, PHAs may elect to use SAFMRs only as the basis for exception payment standards in some or all of those non-mandatory SAFMR areas that cover or are within their jurisdictions. These PHAs are not considered opt-in PHAs.

When applicable, SAFMRs apply to all tenant-based vouchers in the PHA's jurisdiction, including special vouchers such as the Veterans Affairs Supportive Housing (VASH) program, the Family Unification Program (FUP), and special housing types such as Single Room Occupancies (SROs) and homeownership vouchers. SAFMRs do not apply to manufactured home space rental.

PHA Policy

The PHA is a mandatory SAFMR PHA.

The Basic Range [24 CFR 982.503(c) and Notice PIH 2024-34]

The PHA may establish a payment standard within the “basic range” established by HUD—between 90 and 110 percent of the published FMR for each unit size—without HUD approval or prior notification to HUD. For each payment standard area, the PHA must establish a payment standard amount for each unit size which may be based on the same percentage of the published FMR (for example, all units at 100 percent of FMR), or the PHA may set different payment standards for different unit sizes (for example, 1-bedrooms at 90 percent and 2-bedrooms at 100 percent of the FMR).

Designated Payment Standard Areas [24 CFR 982.503(a)(3) and Notice PIH 2024-34]

The PHA may establish designated payment standard areas within each FMR area where the PHA establishes different payment standards, provided each area is no smaller than a census tract block group. If the PHA designates payment standard areas, then it must include the criteria used to determine the designated areas and the payment standard amounts for those areas in the administrative plan.

PHA Policy

The PHA has established designated payment standard areas.

Exception Payment Standards [24 CFR 982.503(d), Notice PIH 2018-01, Notice PIH 2024-34, and FR Notice 9/27/21]

There are several options available to increase payment standards above the basic range. These are known as *exception payment standards*, which are payment standards that exceed 110 percent of the published FMR. The following are types of exception payment standards:

- Payment standards based on SAFMRs in ZIP codes where the SAFMR is higher than the applicable metropolitan or non-metropolitan county FMR
- Payment standards greater than 110 percent up to 120 percent of the applicable FMR
- Payment standards over 120 percent of the applicable FMR
- Payment standards up to 120 percent of the FMR for Veterans Affairs Supportive Housing (HUD-VASH)
- Payment standards necessary as a reasonable accommodation

Payment Standards based on SAFMRs in ZIP codes where the SAFMR is Higher than the FMR: Upon notification to HUD, a PHA that is not located in a SAFMR area or that has not opted to voluntarily adopt SAFMRs may establish an exception payment standard for a ZIP code area that exceeds the basic range for the metropolitan area or county FMR of up to and including 110 percent of the SAFMR for that ZIP code area. If an exception area crosses one or more FMR boundaries, then the maximum exception payment standard amount that a PHA may adopt for the area without HUD approval is 110 percent of the ZIP code area with the lowest SAFMR amount. A PHA that adopts an exception payment standard pursuant to this authority must apply it to the entire ZIP code area.

SAFMRs effective 1/1/2025

Omaha Housing Authority has been designated by the U.S. Department of Housing and Urban Development (HUD) as a Public Housing Agency (PHA) for the purpose of implementing Small Area Fair Market Rents

(SAFMR). In accordance with 24 CFR 888.113(c)(3), OHA is required to adopt SAFMR-based payment standards by January 1, 2025.

SAFMRs will apply to all tenant-based vouchers within OHA's jurisdiction, including special vouchers such as the Veterans Affairs Supportive Housing (HUD-VASH) Program, and specific housing types such as Single Room Occupancies (SROs) and homeownership vouchers. OHA may choose to apply SAFMRs to Project-Based Voucher (PBV) units as permitted under 24 CFR 888.113(c)(5) and (h).

OHA will not apply SAFMRs to the Project-Based Voucher Program. Instead, the Metropolitan Area Fair Market Rents (MAFMRs) will be used for the Project-Based Voucher Program (PBV). All Project-Based Voucher Program (PBV) rents must comply with rent reasonableness requirements, OHA's Project-Based Voucher Program (PBV) policies outlined in this plan, and any other applicable rent-setting regulations in accordance with 24 CFR 983.301.

SAFMR-Hold Harmless Policy

Small Area Fair Market Rent (SAFMRs) Small Area Fair Market Rents (SAFMRs) are Fair Market Rents (FMRs) calculated at the ZIP code level rather than for the entire metropolitan area. SAFMRs are designed to help families access low-poverty, high-opportunity areas by offering rental assistance that matches the local market rent, making housing in these neighborhoods more affordable for families. The PHA has been designated by HUD as an SAFMR PHA and, in accordance with 24 CFR 888.113(c)(3), is required to implement SAFMR-based payment standards no later than January 1, 2025. SAFMRs will apply to all tenant-based vouchers in the PHA's jurisdiction, including special vouchers such as the Veterans Affairs Supportive Housing (HUD-VASH) Program, the Family Unification Program (FUP), and special housing types such as Single Room Occupancies (SROs) and homeownership vouchers. A family that will be affected by a payment standard reduction must receive a written notice twelve months before the effective date of the reduced payment standard. The PHA may, without HUD approval, establish an exception payment standard of up to and including 120% of the SAFMR if required as a reasonable accommodation for a family that includes a person with a disability (or, in the case of HUD-VASH, up to 140% of the SAFMR). The PHA may request HUD approval to establish a payment standard exceeding 120% of the SAFMR (or 140% in the case of HUD-VASH), if necessary, as a reasonable accommodation for such a family. PHA Policy The PHA will establish payment standards for each ZIP code or groups of ZIP codes in its jurisdiction to ensure they are between the 90–110% basic range of the SAFMR or any exception payment standard, if applicable. If the amount on the payment standard schedule is decreased while the family continues to reside in the assisted unit, the payment standard in effect as of the recertification prior to the decrease will remain in place. The payment standard shall be frozen at this level until such time as one of the following occurs:

- The payment standard is equal to or above the frozen level
 - The family moves
- SAFMR Sample Admin Plan Language: Hold Harmless © 2024 The Department of Housing and Urban Development. All Rights Reserved. Content contribution and development by CVR Associates, Inc. Page 2

A change in household composition requires a change in payment standard at the next annual reexamination

Payment Standards Greater than 110 Percent Up to 120 Percent: Upon notification to HUD, a PHA may establish exception payment standards between 110 percent and 120 percent of the applicable FMR if the PHA meets one of the following criteria:

- Success rate: Fewer than 75 percent of families to which the PHA has issued tenant-based vouchers during the most recent 12-month period for which there is success rate data available have become participants on the program; or
- Rent burden: More than 40 percent of families with tenant-based assistance pay more than 30 percent of their adjusted income as their family share.

The PHA may revert back to the basic range at any time without notification to HUD.

PHAs may combine exception payment standards based on the SAFMR and exception payment standards greater than 110 and up to 120 percent.

Other Exception Payment Standards: PHAs may request HUD approval to establish exception payment standards up to 120 percent of the FMR when the above criteria do not apply or in order to establish exception payment standards that exceed 120 percent of the FMR. Requests may be made for an entire FMR area or a designated part of the FMR area.

Exception Payment Standards for VASH: In addition, HUD allows PHAs to establish a HUD-Veterans Affairs Supportive Housing (HUD-VASH) exception payment standard. PHAs may go up to but no higher than 120 percent of the FMR or SAFMR specifically for VASH families. PHAs who want to establish a VASH exception payment standard over 120 percent must still request a waiver from HUD (See Section 19-III.E.).

Once exception payment standards are adopted, the PHA may use the exception payment standard for all units, or for only units of a particular size. The exception payment standard may be established for a designated part of the FMR area (called an “exception area”) or for the entire FMR area. Exception areas are typically county, city, town, ZIP code, or census tract areas. However, so long as the exception area is no smaller than census tract block group, the PHA may determine the area for the exception area.

PHA Policy

The PHA has established exception payment standards effective 1/1/2025.

Reasonable Accommodation [24 CFR 982.503(d)(5), 24 CFR 982.505(d), Notice PIH 2024-34, and Notice PIH 2010-26]

Unit-by-unit exceptions to the PHA's payment standards generally are not permitted. However, an exception may be made on a case-by-case basis as a reasonable accommodation for a family that includes a person with disabilities. (See Chapter 2 for a discussion of reasonable accommodations.) This type of exception does not affect the PHA's payment standard schedule.

If required as a reasonable accommodation, the PHA may make an exception to the payment standard without HUD approval if the exception amount does not exceed 120 percent of the applicable FMR/SAFMR for the unit size (or in the case of VASH, up to 140 percent of the FMR/SAFMR). The PHA may request HUD approval for an exception to the payment standard for a particular family if the required amount exceeds 120 percent of the FMR/SAFMR.

PHA Policy

A family that requires a reasonable accommodation may request a higher payment standard at the time the Request for Tenancy Approval (RTA) is submitted. The family must document the need for the exception. In order to approve an exception, or request an exception from HUD, the PHA must determine that:

- There is a shortage of affordable units that would be appropriate for the family;
- The family share would otherwise exceed 40 percent of adjusted monthly income; and
- The rent for the unit is reasonable.

Payment Standard below the Basic Range [24 CFR 982.503(e) and Notice PIH 2024-34]

The PHA must request HUD approval to establish a payment standard amount that is lower than the basic range. At HUD's sole discretion, HUD may approve establishment of a payment standard lower than the basic range. HUD will consider rent burden on families assisted under the program.

Updating Payment Standards [24 CFR 982.503(c)(3) and Notice PIH 2023-24]

HUD publishes FMRs in the *Federal Register* and also makes them available on the HUD website with an effective date of October 1. When HUD updates FMRs, the PHA must revise its payment standard amounts and schedule no later than three months following the effective date of the published FMR if revisions are necessary to stay within the basic range. HUD may require the PHA to make further adjustments if it determines that rent burdens for assisted families in the PHA's jurisdiction are unacceptably high [24 CFR 982.503(h)]. PHAs must include a copy of the payment standard schedule in the voucher briefing materials, and HUD strongly encourages PHAs to post their payment standard schedule on their website.

PHA Policy

The PHA will review the appropriateness of the payment standards on an annual basis when the new FMR is published, and at other times as determined necessary. In addition to ensuring the payment standards are always within the "basic range," the PHA will consider the following factors when determining whether an adjustment should be made to the payment standard schedule:

Funding Availability: The PHA will review projected HAP expenditures to determine the impact projected subsidy adjustments will have on funding available for the program and the number of families served. The PHA will compare the number of families who could be served under revised payment standard amounts with the number assisted under current payment standard amounts.

Rent Burden of Participating Families: Rent burden will be determined by identifying the percentage of families, for each unit size, that are paying more than 30 percent of their monthly adjusted income as the family share. When 40 percent or more of families, for any given unit size, are paying more than 30 percent of adjusted monthly income as the family share, the PHA will consider increasing the payment standard. In evaluating rent burdens, the PHA will not include families renting a larger unit than their family unit size.

Quality of Units Selected: The PHA may review the quality of units selected by participant families when making the determination of the percent of income families are paying for housing, to ensure that payment standard increases are only made when needed to reach the mid-range of the market.

Changes in Rent to Owner: The PHA may review a sample of the units to determine how often owners are increasing or decreasing rents and the average percent of increases and decreases by bedroom size.

Unit Availability: The PHA may review the availability of units for each unit size, particularly in areas with low concentrations of poor and minority families.

Lease-up Time and Success Rate: The PHA may consider the percentage of families that are unable to locate suitable housing before the voucher expires and whether families are leaving the jurisdiction to find affordable housing.

Effective dates of changes to payment standard amounts will be determined at the time of update. The PHA will always ensure the payment standards will be within the basic range. The PHA will post its payment standards schedule on the PHA's website and include a copy in the voucher briefing materials.

16-II.C. UTILITY ALLOWANCES [24 CFR 982.517]

A PHA-established utility allowance schedule is used in determining family share and PHA subsidy. The PHA must maintain a utility allowance schedule for (1) all tenant-paid utilities, (2) the cost of tenant-supplied refrigerators and ranges, and (3) other tenant-paid housing services such as trash collection. The PHA must maintain an area-wide utility allowance schedule. The utility allowance schedule must be determined based on the typical cost of utilities and services paid by energy-conservative households that occupy housing of similar size and type in the same locality. In developing the schedule, the PHA must use normal patterns of consumption for the community as a whole, and current utility rates.

The utility allowance must include the utilities and services that are necessary in the locality to provide housing that complies with housing quality standards. Costs for telephone, cable/satellite television, and internet services are not included in the utility allowance schedule.

In the utility allowance schedule, the PHA must classify utilities and other housing services according to the following general categories: space heating; air conditioning; cooking; water heating; water; sewer; trash collection; other electric; cost of tenant-supplied refrigerator; cost of tenant-supplied range; applicable surcharges; and other specified housing services.

The cost of each utility and housing service must be stated separately by unit size and type. Chapter 18 of the *HCV Guidebook* provides detailed guidance to the PHA about establishing utility allowance schedules. The PHA must state its policy for utility allowance payments in the administrative plan and apply it consistently to all households. The PHA must provide a copy of the utility allowance schedule to HUD.

Energy Efficient Utility Allowance [24 CFR 982.517(b)(2)(ii)]

In addition to the area-wide utility allowance standard, the PHA may maintain an area-wide, energy efficient utility allowance schedule to be used for units that are in a building that meets Leadership in Energy and Environmental Design (LEED) or Energy Star standards.

PHA Policy

The PHA will not maintain an energy efficient utility allowance schedule.

Air Conditioning [24 CFR 982.517(b)(1)(iii)]

The PHA must provide a utility allowance for air-conditioning when the majority of housing units in the market provide central air-conditioning or are wired for tenant-installed air conditioners.

PHA Policy

The PHA has included an allowance for air-conditioning in its schedule. Central air-conditioning or a portable air conditioner must be present in a unit before the PHA will apply this allowance to a family's rent and subsidy calculations.

Reasonable Accommodation and Individual Relief

Upon request from a family that includes a person with disabilities, the PHA must approve a utility allowance, which is higher than the applicable amount on the utility allowance schedule if a higher utility allowance is needed as a reasonable accommodation to make the program accessible and usable by the family member with a disability [24 CFR 982.517(c)]. See Chapter 2 for policies regarding the request and approval of reasonable accommodations.

Further, the PHA may grant requests for relief from charges in excess of the utility allowance on reasonable grounds, such as special needs of the elderly, ill or residents with disabilities, or special factors not within control of the resident, as the PHA deems appropriate. The family must request the higher allowance and provide the PHA with an explanation of the need for the individual relief and information about the amount of additional allowance required [see HCV GB, p.18-8].

PHA's should develop criteria for granting relief and to notify residents about the availability of individual relief, and also to notify participants about the availability of individual relief programs (sometimes referred to as "Medical Baseline discounts") offered by the local utility company. Policies for granting exception utility allowances can be found in Section 6-III.D. of this plan.

~~HCV program regulations require a PHA to approve a utility allowance amount higher than shown on the PHA's schedule if a higher allowance is needed as a reasonable accommodation for a family member with a disability. For example, if a family member with a disability requires such an accommodation, the PHA will approve an allowance for air conditioning, even if the PHA has determined that an allowance for air conditioning generally is not needed (See Chapter 2 for policies regarding the request and approval of reasonable accommodations).~~

Utility Allowance Revisions

The PHA must review its schedule of utility allowances each year and must revise the schedule if there has been a change of 10 percent or more in any utility rate since the last time the allowance for that utility was revised [24 CFR 982.517(c)(1)].

The PHA must maintain information supporting its annual review of utility allowance and any revisions made in its utility allowance schedule.

PART III: INFORMAL REVIEWS AND HEARINGS

16-III.A. OVERVIEW

Both applicants and participants have the right to disagree with, and appeal, certain decisions of the PHA that may adversely affect them. PHA decisions that may be appealed to by applicants and participants are discussed in this section.

The process for applicant appeals of PHA decisions is called the “informal review.” For participants (or applicants denied admission because of citizenship issues), the appeal process is called an “informal hearing.” PHAs are required to include informal review procedures for applicants and informal hearing procedures for participants in their administrative plans [24 CFR 982.54(d)(12) and (13)].

16-III.B. INFORMAL REVIEWS

Informal reviews are provided for program applicants. An applicant is someone who has applied for admission to the program, but is not yet a participant in the program. Informal reviews are intended to provide a “minimum hearing requirement” [24 CFR 982.554], and need not be as elaborate as the informal hearing requirements [*Federal Register* 60, no. 127 (3 July 1995): 34690].

Decisions Subject to Informal Review [24 CFR 982.554(a) and (c)]

The PHA must give an applicant the opportunity for an informal review of a decision denying assistance [24 CFR 982.554(a)]. Denial of assistance may include any or all of the following [24 CFR 982.552(a)(2)]:

- Denying listing on the PHA waiting list
- Denying or withdrawing a voucher
- Refusing to enter into a HAP contract or approve a lease
- Refusing to process or provide assistance under portability procedures

Informal reviews are *not* required for the following reasons [24 CFR 982.554(c)]:

- Discretionary administrative determinations by the PHA
- General policy issues or class grievances
- A determination of the family unit size under the PHA subsidy standards
- A PHA determination not to approve an extension of a voucher term
- A PHA determination not to grant approval of the tenancy
- A PHA determination that the unit is not in compliance with the housing quality standards
- A PHA determination that the unit does not meet space standards

PHA Policy

The PHA will only offer an informal review to applicants for whom assistance is being denied. Denial of assistance includes: denying listing on the PHA waiting list; denying or withdrawing a voucher; refusing to enter into a HAP contract or approve a lease; refusing to process or provide assistance under portability procedures.

Notice to the Applicant [24 CFR 982.554(a)]

The PHA must give an applicant prompt notice of a decision denying assistance. The notice must contain a brief statement of the reasons for the PHA decision and must also state that the applicant may request an informal review of the decision. The notice must describe how to obtain the informal review.

Scheduling an Informal Review

PHA Policy

A request for an informal review must be made in writing and delivered to the PHA either in person or by first class mail, by the close of the business day, no later than 10 business days from the date of the PHA's denial of assistance.

The PHA must schedule and send written notice of the informal review within 10 business days of the family's request.

If the informal review will be conducted remotely, at the time the PHA notifies the family of the informal review, the family will be informed:

Regarding the processes to conduct a remote informal review;

That, if needed, the PHA will provide technical assistance prior to and during the informal review; and

That if the family or any individual witness has any technological, resource, or accessibility barriers preventing them from fully accessing the remote informal review, the family may inform the PHA and the PHA will assist the family in either resolving the issues or allow the family to participate in an in-person informal review, as appropriate.

Informal Review Procedures [24 CFR 982.554(b)]

The informal review must be conducted by a person other than the one who made or approved the decision under review, or a subordinate of this person.

The applicant must be provided an opportunity to present written or oral objections to the decision of the PHA.

Remote Informal Reviews [Notice PIH 2020-32]

There is no requirement that informal reviews be conducted in-person and, as such, HUD allows PHAs to conduct all or a portion of their informal review remotely either over the phone, via video conferencing, or through other virtual platforms. If the PHA chooses to conduct remote informal reviews, applicants may still request an in-person informal review, as applicable. ~~All PHA policies and processes for remote informal reviews must be conducted in accordance with due process requirements and be in compliance with HUD regulations.~~

PHA Policy

The PHA has sole discretion to require informal reviews be conducted remotely in case of local, state, or national physical distancing orders, inclement weather or natural disaster.

In addition, the PHA will conduct an informal review remotely upon request of the applicant as a reasonable accommodation for a person with a disability, if an applicant does not have childcare or transportation that would enable them to attend the informal review, or if the applicant believes an in-person informal review would create an undue health risk. The PHA will consider other reasonable requests for a remote informal review on a case-by-case basis.

Ensuring Accessibility for Persons with Disabilities and LEP Individuals

As with in-person informal reviews, the platform for conducting remote informal reviews must be accessible to persons with disabilities and the informal review must be conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio describer, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual. PHAs may never request or require that individuals with disabilities provide their own auxiliary aids or services, including for remote informal hearings.

PHAs are required to make reasonable accommodations in policies, practices, and procedures to ensure persons with disabilities have a full and equal opportunity to participate in and benefit from all aspects of the informal review process. See Chapter 2 for a more detailed discussion of reasonable accommodation requirements.

If no method of conducting a remote informal review is available that appropriately accommodates an individual's disability, the PHA may not hold against the individual their inability to participate in the remote informal review, and the PHA should consider whether positioning the remote informal review to a later date is appropriate or whether there is a suitable alternative.

Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation, will depend on the specific circumstances and requirements.

As with in-person reviews, Limited English Proficiency (LEP) requirements also apply to remote informal reviews, including the use of interpretation services and document translation.

See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote informal reviews.

Conducting Remote Informal Reviews

The PHA must ensure that the lack of technology or inability to use technology for remote informal reviews does not pose a disadvantage to families that may not be apparent to the PHA. The PHA should determine through a survey or other means if these barriers exist prior to conducting the remote informal review and, if the family does not have the proper technology to fully participate, either postpone the informal review or provide an alternate means of access.

As with in-person informal reviews, the PHA must provide all materials presented, whether paper or electronic, to the family prior to the remote informal review. The family must also be provided with an accessible means by which to transmit their own evidence.

The PHA must ensure that the applicant has the right to hear and be heard. All PHA policies and processes for remote informal reviews must be conducted in accordance with due process requirements be in compliance with HUD regulations at 24CFR 982.554 and guidance specified in Notice PIH 2020-32.

PHA must ensure that the applicant has the right to hear and be heard. All PHA policies and processes for remote informal reviews must be documented in accordance with due process requirements and be in compliance with HUD regulations at 24CFR 982.554 and guidance specified in Notice PIH 2020-32.

PHA Policy

The PHA will conduct remote informal reviews via a video conferencing platform, when available. If, after attempting to resolve any barriers, applicants are unable to adequately access the video conferencing platform at any point, or upon applicant request, the informal review will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in at any point, the remote informal review will be postponed, and an in-person alternative will be provided promptly within a reasonable time.

At least five business days prior to scheduling the remote review, the PHA will provide the family with login information and/or conferencing call-in information and an electronic copy of all materials being presented via first class mail and/or email. The notice will advise the family of technological requirements for the informal review and request the family notify the PHA of any known barriers. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person informal review.

If the informal review is to be conducted remotely, the PHA will require the family to provide any documents directly relevant to the informal review at least 24 hours before the scheduled review through the mail, via email, or text. The PHA will scan and email copies of these documents to the PHA representative the same day.

Documents will be shared electronically whenever possible.

The PHA will follow up the email with a phone call and/or email to the applicant at least one business day prior to the remote informal review to ensure that the applicant received all information and is comfortable accessing the video conferencing or call-in platform.

The PHA will ensure that all electronic information stored or transmitted with respect to the informal review is secure, including protecting personally identifiable information (PII), and meets the requirements for accessibility for persons with disabilities and persons with LEP.

~~The PHA will conduct remote informal reviews via telephone conferencing call-in or via videoconferencing. If the informal review will be conducted via videoconferencing, the PHA will ensure that all applicants, applicant representatives, PHA representatives and the person conducting the informal review can adequately access the platform (i.e., hear, be heard, see, and be seen). If any applicant, applicant representative, PHA representative, or person conducting the informal review is unable to effectively utilize the videoconferencing platform, the informal review will be conducted by telephone conferencing call-in.~~

~~Whether the informal review is to be conducted via videoconferencing or telephone call-in, the PHA will provide all parties login information and/or conferencing call-in information before the review.~~

Informal Review Decision [24 CFR 982.554(b)]

The PHA must notify the applicant of the PHA's final decision, including a brief statement of the reasons for the final decision.

PHA Policy

In rendering a decision, the PHA will evaluate the following matters:

Whether or not the grounds for denial were stated factually in the notice to the family.

The validity of the grounds for denial of assistance. If the grounds for denial are not specified in the regulations, then the decision to deny assistance will be overturned.

The validity of the evidence. The PHA will evaluate whether the facts presented prove the grounds for denial of assistance. If the facts prove that there are grounds for denial, and the denial is required by HUD, the PHA will uphold the decision to deny assistance.

If the facts prove the grounds for denial, and the denial is discretionary, the PHA will consider the recommendation of the person conducting the informal review in making the final decision whether to deny assistance.

The PHA will notify the applicant of the final decision, including a statement explaining the reason(s) for the decision. The notice will be mailed within 10 business days of the informal review, to the applicant and his or her representative, if any, along with proof of mailing.

If the decision to deny is overturned as a result of the informal review, processing for admission will resume.

If the family fails to appear for their informal review, the denial of admission will stand and the family will be so notified.

16-III.C. INFORMAL HEARINGS FOR PARTICIPANTS [24 CFR 982.555]

PHAs must offer an informal hearing for certain PHA determinations relating to the individual circumstances of a participant family. A participant is defined as a family that has been admitted to the PHA's HCV program and is currently assisted in the program. The purpose of the informal hearing is to consider whether the PHA's decisions related to the family's circumstances are in accordance with the law, HUD regulations and PHA policies.

The PHA is not permitted to terminate a family's assistance until the time allowed for the family to request an informal hearing has elapsed, and any requested hearing has been completed.

Termination of assistance for a participant may include any or all of the following:

- Refusing to enter into a HAP contract or approve a lease
- Terminating housing assistance payments under an outstanding HAP contract
- Refusing to process or provide assistance under portability procedures

Decisions Subject to Informal Hearing

Circumstances for which the PHA must give a participant family an opportunity for an informal hearing are as follows:

- A determination of the family's annual or adjusted income, and the use of such income to compute the housing assistance payment
- A determination of the appropriate utility allowance (if any) for tenant-paid utilities from the PHA utility allowance schedule
- A determination of the family unit size under the PHA's subsidy standards
- A determination to terminate assistance for a participant family because of the family's actions or failure to act
- A determination to terminate assistance because the participant has been absent from the assisted unit for longer than the maximum period permitted under PHA policy and HUD rules
- A determination to terminate a family's Family Self Sufficiency contract, withhold supportive services, or propose forfeiture of the family's escrow account [24 CFR 984.303(i)]

Circumstances for which an informal hearing is not required are as follows:

- Discretionary administrative determinations by the PHA
- General policy issues or class grievances
- Establishment of the PHA schedule of utility allowances for families in the program
- A PHA determination not to approve an extension of a voucher term
- A PHA determination not to approve a unit or tenancy
- A PHA determination that a unit selected by the applicant is not in compliance with housing quality standards
- A PHA determination that the unit is not in accordance with space standards because of family size
- A determination by the PHA to exercise or not to exercise any right or remedy against an owner under a HAP contract

PHA Policy

The PHA will only offer participants the opportunity for an informal hearing when required to by the regulations, and if the PHA denies a request for a reasonable accommodation (see Chapter 2).

Remote Informal Hearings [Notice PIH 2020-32}

There is no requirement that informal hearings be conducted in-person, and as such, HUD allows PHAs to conduct all or a portion of their informal hearings remotely either over the phone, via video conferencing, or through other virtual platforms. If the PHA chooses to conduct remote informal hearings, applicants may still request an in-person informal hearing, as applicable.

~~The PHA's essential responsibility is to ensure informal hearings meet the requirements of due process and comply with HUD regulations. Therefore, all PHA policies and processes for remote informal hearings will be conducted in accordance with due process requirements and will be in compliance with HUD regulations.~~

PHA Policy

The PHA has the sole discretion to require that informal hearings be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster.

In addition, the PHA will conduct an informal hearing remotely upon request as a reasonable accommodation for a person with a disability, if a participant does not have childcare or transportation that would enable them to attend the informal hearing, or if the participant believes an in-person hearing would create an undue health risk. The PHA will consider other reasonable requests for a remote informal hearing on a case-by-case basis.

Ensuring Accessibility for Persons with Disabilities and LEP Individuals

As with in-person informal hearings, the platform for conducting remote informal hearings must be accessible to persons with disabilities and the informal hearings must be conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio descript, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual. PHAs may never request or require that individuals with disabilities provide their own auxiliary aids or services, including for remote informal hearings.

PHAs are required to make reasonable accommodations in policies, practices, and procedures to ensure persons with disabilities have a full and equal opportunity to participate in and benefit from all aspects of the informal hearing process. See Chapter 2 for a more detailed discussion of reasonable accommodation requirements.

If no method of conducting a remote informal hearing is available that appropriately accommodates an individual's disability, the PHA may not hold against the individual their inability to participate in the remote informal hearing, and the PHA should consider whether positioning the remote informal hearing to a later date is appropriate or whether there is a suitable alternative.

Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation, will depend on the specific circumstances and requirements.

As with in-person reviews, Limited English Proficiency (LEP) requirements also apply to remote informal hearings, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote informal hearings.

Conducting Informal Hearings Remotely

The PHA must ensure that the lack of technology or inability to use technology for remote informal hearings does not pose a disadvantage to families that may not be apparent to the PHA. The PHA should determine through a survey or other means if these barriers exist prior to conducting the remote informal review and, if the family does not have the proper technology to fully participate, either postpone the informal review or provide an alternate means of access.

As with in-person informal reviews, the PHA must provide all materials presented, whether paper or electronic, to the family prior to the remote informal review. The family must also be provided with an accessible means by which to transmit their own evidence.

PHA must ensure the applicant has the right to hear and be heard. All PHA policies and processes for remote informal reviews must be conducted in accordance with due process requirements be in compliance with HUD regulations at 24CFR 982.554 and guidance specified in Notice PIH 2020-32.

~~In conducting any informal hearing remotely, the PHA shall ensure due process and that all~~

~~parties are able to have full access to the hearing.~~

PHA Policy

The PHA will conduct remote informal hearings via a video conferencing platform, when available. If, after attempting to resolve any barriers, applicants are unable to adequately access the video conferencing platform at any point, or upon applicant request, the informal hearing will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in at any point, the remote informal hearing will be postponed, and an in-person alternative will be provided promptly within a reasonable time.

At least five business days prior to scheduling the remote hearing, the PHA will provide the family with login information and/or conferencing call-in information and an electronic copy of all materials being presented via first class mail and/or email. The notice will advise the family of technological requirements for the informal hearing and request the family notify the PHA of any known barriers. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person informal hearing.

If the informal hearing is to be conducted remotely, the PHA will require the family to provide any documents directly relevant to the informal hearing at least 24 hours before the scheduled hearing through the mail, via email, or text. The PHA will scan and email copies of these documents to the PHA representative the same day.

Documents will be shared electronically whenever possible.

The PHA will follow up the email with a phone call and/or email to the applicant at least one business day prior to the remote informal hearing to ensure that the applicant received all information and is comfortable accessing the video conferencing or call-in platform.

The PHA will ensure that all electronic information stored or transmitted with respect to the informal hearing is secure, including protecting personally identifiable information (PII), and meets the requirements for accessibility for persons with disabilities and persons with LEP.

~~The PHA will conduct remote informal hearings via telephone conferencing call-in or via videoconferencing. If the informal hearing will be conducted via videoconferencing, the PHA will ensure that all participants, participant representatives, advocates, witnesses, PHA representatives, and the hearing officer can adequately access the platform (i.e., hear, be heard, see, and be seen).~~

~~If any participant, representative, advocate, witness, PHA representative, or hearing officer is unable to effectively utilize the videoconferencing platform, the informal hearing will be conducted by telephone conferencing call-in.~~

~~Whether the informal hearing is to be conducted via videoconferencing or telephone call-in, the PHA will provide all parties login information and/or telephone call-in information before the hearing.~~

Informal Hearing Procedures

Notice to the Family [24 CFR 982.555(c)]

When the PHA makes a decision that is subject to informal hearing procedures, the PHA must inform the family of its right to an informal hearing at the same time that it informs the family of the decision.

For decisions related to the family's annual or adjusted income, the determination of the appropriate utility allowance, and the determination of the family unit size, the PHA must notify the family that they may ask for an explanation of the basis of the determination, and that if they do not agree with the decision, they may request an informal hearing on the decision.

For decisions related to the termination of the family's assistance, or the denial of a family's request for an exception to the PHA's subsidy standards, the notice must contain a brief statement of the reasons for the decision, a statement that if the family does not agree with the decision, the family may request an informal hearing on the decision, and a statement of the deadline for the family to request an informal hearing.

PHA Policy

In cases where the PHA makes a decision for which an informal hearing must be offered, the notice to the family will include all of the following:

The proposed action or decision of the PHA.

A brief statement of the reasons for the decision, including the regulatory reference.

The date the proposed action will take place.

A statement of the family's right to an explanation of the basis for the PHA's decision.

A statement that if the family does not agree with the decision the family may request an informal hearing of the decision.

A deadline for the family to request the informal hearing.

To whom the hearing request should be addressed.

A copy of the PHA's hearing procedures.

That the family may request a remote informal hearing

~~If the PHA will require that the hearing be conducted remotely, at the time the notice is sent to the family informing them of the right to request an informal hearing, the family will be notified that the informal hearing will be conducted remotely. The family will be informed of the processes involved in a remote informal hearing and that the PHA will provide technical assistance, if needed, before the informal hearing.~~

Scheduling an Informal Hearing [24 CFR 982.555(d)]

When an informal hearing is required, the PHA must proceed with the hearing in a reasonably expeditious manner upon the request of the family.

PHA Policy

A request for an informal hearing must be made in writing and delivered to the PHA either in person or by first class mail, by the close of the business day, no later than 10 business days from the date of the PHA's decision or notice to terminate assistance.

The PHA must schedule and send written notice of the informal hearing to the family within 10 business days of the family's request.

If the PHA hearing will be conducted remotely, at the time the notice is sent to the family, the family will be notified:

Regarding the processes involved in a remote informal hearing;

That the PHA will provide technical assistance prior to and during the informal hearing, if needed; and

That if the family or any individual witness has any technological, resource, or accessibility barriers, the family may inform the PHA and the PHA will assist the family in either resolving the issue or allow the family to participate in an in-person hearing, as appropriate.

The family may request to reschedule a hearing for good cause, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict which seriously affects the health, safety or welfare of the family. Requests to reschedule a hearing ~~must~~ may be made orally or in writing prior to the hearing date, or by phone, fax or email. At its discretion, the PHA may request documentation of the "good cause" prior to rescheduling the hearing.

If the family does not appear within 20 minutes of the scheduled time, and was unable to reschedule the hearing in advance due to the nature of the conflict, the family must contact the PHA by the end of the business day of the scheduled hearing date, excluding weekends and holidays. The PHA will reschedule the hearing only if the family can show good cause for the failure to appear, or if it is needed as a reasonable accommodation for a person with disabilities. If the family cannot show good cause for the failure to appear, or a rescheduling is not needed as a reasonable accommodation, the PHA's decision will stand.

Pre-Hearing Right to Discovery [24 CFR 982.555(e)]

Participants and the PHA are permitted pre-hearing discovery rights. The family must be given the opportunity to examine before the hearing any PHA documents that are directly relevant to the hearing. The family must be allowed to copy any such documents at their own expense. If the PHA does not make the document available for examination on request of the family, the PHA may not rely on the document at the hearing.

For the purpose of informal hearings, *documents* include records and regulations.

PHA Policy

The family will be allowed to copy any documents related to the hearing at a cost of \$.25 per page. The family must request discovery of PHA documents no later than 12:00 p.m. on the business day prior to the scheduled hearing date.

If the hearing will be conducted remotely, the PHA will compile a hearing packet, consisting of all documents the PHA intends to produce at the informal hearing. The PHA will mail copies of the hearing packet to the family, the family's representatives, if any, and the hearing officer at least three days before the scheduled remote informal hearing. The original hearing packet will be in the possession of the PHA representative and retained by the PHA.

Documents will be shared electronically whenever possible.

The PHA hearing procedures may provide that the PHA must be given the opportunity to examine at the PHA offices before the hearing any family documents that are directly relevant to the hearing. The PHA must be allowed to copy any such document at the PHA's expense. If the family does not make the document available for examination on request of the PHA, the family may not rely on the document at the hearing.

PHA Policy

For in-person hearings, the PHA will not require pre-hearing discovery by the PHA of family documents directly relevant to the hearing.

If the informal hearing is to be conducted remotely, the PHA will require the family to provide any documents directly relevant to the informal hearing within 5 days after the hearing date ~~at least 24 hours before the~~ is-scheduled ~~hearing~~. The PHA will scan and email copies of these documents to the hearing officer and the PHA representative the same day.

Documents will be shared electronically whenever possible.

Participant's Right to Bring Counsel [24 CFR 982.555(e)(3)]

At its own expense, the family may be represented by a lawyer or other representative at the informal hearing.

Informal Hearing Officer [24 CFR 982.555(e)(4)]

Informal hearings will be conducted by a person or persons approved by the PHA, other than the person who made or approved the decision or a subordinate of the person who made or approved the decision.

Attendance at the Informal Hearing

PHA Policy

Hearings may be attended by a hearing officer and the following applicable persons:

A PHA representative(s) and any witnesses for the PHA

The participant and any witnesses for the participant

The participant's counsel or other representative

Any other person approved by the PHA as a reasonable accommodation for a person with a disability

Conduct at Hearings

The person who conducts the hearing may regulate the conduct of the hearing in accordance with the PHA's hearing procedures [24 CFR 982.555(4)(ii)].

PHA Policy

The hearing officer is responsible to manage the order of business and to ensure that hearings are conducted in a professional and businesslike manner. Attendees are expected to comply with all hearing procedures established by the hearing officer and guidelines for conduct. Any person demonstrating disruptive, abusive or otherwise inappropriate behavior will be excused from the hearing at the discretion of the hearing officer.

Evidence [24 CFR 982.555(e)(5)]

The PHA and the family must be given the opportunity to present evidence and question any witnesses. In general, all evidence is admissible at an informal hearing. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

PHA Policy

Any evidence to be considered by the hearing officer must be presented at the time of the hearing. There are four categories of evidence.

Oral evidence: the testimony of witnesses

Documentary evidence: a writing which is relevant to the case, for example, a letter written to the PHA. Writings include all forms of recorded communication or representation, including letters, words, pictures, sounds, videotapes or symbols or combinations thereof.

Demonstrative evidence: Evidence created specifically for the hearing and presented as an illustrative aid to assist the hearing officer, such as a model, a chart or other diagram.

Real evidence: A tangible item relating directly to the case.

Hearsay Evidence is evidence based not on a witness' personal knowledge. In and of itself, hearsay evidence carries no weight when making a finding of fact. The hearing officer may include hearsay evidence when considering their decision if it is corroborated by other evidence. Even though hearsay evidence is generally admissible in a hearing, the hearing officer will not base a hearing decision on hearsay alone unless there is clear probative value and credibility of the evidence, and the party seeking the change has met the burden of proof.

~~*Hearsay Evidence is evidence of a statement that was made other than by a witness while testifying at the hearing and that is offered to prove the truth of the matter. Even though evidence, including hearsay, is generally admissible, hearsay evidence alone cannot be used as the sole basis for the hearing officer's decision.*~~

If either the PHA or the family fail to comply with the discovery requirements described above, the hearing officer will refuse to admit such evidence.

Other than the failure of a party to comply with discovery, the hearing officer has the authority to overrule any objections to evidence.

Procedures for Rehearing or Further Hearing

PHA Policy

The hearing officer may ask the family for additional information and/or might adjourn the hearing in order to reconvene at a later date, before reaching a decision. If the family misses an appointment or deadline ordered by the hearing officer, the action of the PHA will take effect and another hearing will not be granted.

Hearing Officer's Decision [24 CFR 982.555(e)(6)]

The person who conducts the hearing must issue a written decision, stating briefly the reasons for the decision. Factual determinations relating to the individual circumstances of the family must be based on a preponderance of evidence presented at the hearing.

PHA Policy

In rendering a decision, the hearing officer will consider the following matters:

PHA Notice to the Family: The hearing officer will determine if the reasons for the PHA's decision are factually stated in the Notice.

Discovery: The hearing officer will determine if the PHA and the family were given the opportunity to examine any relevant documents in accordance with PHA policy.

PHA Evidence to Support the PHA Decision: The evidence consists of the facts presented. Evidence is not conclusion, and it is not argument. The hearing officer will evaluate the facts to determine if they support the PHA's conclusion.

Validity of Grounds for Termination of Assistance (when applicable): The hearing officer will determine if the termination of assistance is for one of the grounds specified in the HUD regulations and PHA policies. If the grounds for termination are not specified in the regulations or in compliance with PHA policies, then the decision of the PHA will be overturned.

The hearing officer will issue a written decision to the family and the PHA no later than 10 business days after the hearing. The report will contain the following information:

Hearing information:

Name of the participant;

Date, time and place of the hearing;

Name of the hearing officer;

Name of the PHA representative; and

Name of family representative (if any).

Background: A brief, impartial statement of the reason for the hearing.

Summary of the Evidence: The hearing officer will summarize the testimony of each witness and identify any documents that a witness produced in support of his/her testimony and that are admitted into evidence.

Findings of Fact: The hearing officer will include all findings of fact, based on a preponderance of the evidence. *Preponderance of the evidence* is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence may not be determined by the number of witnesses, but by the greater weight of all evidence.

Conclusions: The hearing officer will render a conclusion derived from the facts that were found to be true by a preponderance of the evidence. The conclusion will result in a determination of whether these facts uphold the PHA's decision.

Order: The hearing report will include a statement of whether the PHA's decision is upheld or overturned. If it is overturned, the hearing officer will instruct the PHA to change the decision in accordance with the hearing officer's determination. In the case of termination of assistance, the hearing officer will instruct the PHA to restore the participant's program status. ([Update form](#))

Issuance of Decision [24 CFR 982.555(e)(6)]

A copy of the hearing must be furnished promptly to the family.

PHA Policy

The hearing officer will mail a "Notice of Hearing Decision" to the PHA and to the participant on the same day. This notice will be sent by first-class mail. The participant will be mailed the original "Notice of Hearing Decision" and a copy of the proof of mailing. A copy of the "Notice of Hearing Decision" will be maintained in the PHA's file. **At the family's request, this information can be transferred by email.**

Effect of Final Decision [24 CFR 982.555(f)]

The PHA is not bound by the decision of the hearing officer for matters in which the PHA is not required to provide an opportunity for a hearing, decisions that exceed the authority of the hearing officer, decisions that conflict with or contradict HUD regulations, requirements, or are otherwise contrary to federal, state, or local laws.

If the PHA determines it is not bound by the hearing officer's decision in accordance with HUD regulations, the PHA must promptly notify the family of the determination and the reason for the determination.

PHA Policy

The Executive Director **and Department Director have has** the authority to determine that the PHA is not bound by the decision of the hearing officer because the PHA was not required to provide a hearing, the decision exceeded the authority of the hearing officer, the decision conflicted with or contradicted HUD regulations, requirements, or the decision was otherwise contrary to federal, state, or local laws.

In such a case, the PHA will mail a "Notice of Final Decision" to the PHA and the participant on the same day. The "Notice of Final Decision" will be sent by first-class mail. A copy of this notice will be maintained in the PHA's file.

16-III.D. HEARING AND APPEAL PROVISIONS FOR NONCITIZENS [24 CFR 5.514]

Denial or termination of assistance based on immigration status is subject to special hearing and notice rules. Applicants who are denied assistance due to immigration status are entitled to an informal hearing, not an informal review.

Assistance to a family may not be delayed, denied, or terminated on the basis of immigration status at any time prior to a decision under the United States Citizenship and Immigration Services (USCIS) appeal process. Assistance to a family may not be terminated or denied while the PHA hearing is pending, but assistance to an applicant may be delayed pending the completion of the informal hearing.

A decision against a family member, issued in accordance with the USCIS appeal process or the PHA informal hearing process, does not preclude the family from exercising the right, that may otherwise be available, to seek redress directly through judicial procedures.

Notice of Denial or Termination of Assistance [24 CFR 5.514(d)]

The notice of denial or termination of assistance for noncitizens must advise the family:

- That financial assistance will be denied or terminated, and provide a brief explanation of the reasons for the proposed denial or termination of assistance.
- The family may be eligible for proration of assistance.
- In the case of a participant, the criteria and procedures for obtaining relief under the provisions for preservation of families [24 CFR 5.514 and 5.518].
- That the family has a right to request an appeal to the USCIS of the results of secondary verification of immigration status and to submit additional documentation or explanation in support of the appeal.
- That the family has a right to request an informal hearing with the PHA either upon completion of the USCIS appeal or in lieu of the USCIS appeal.
- For applicants, assistance may not be delayed until the conclusion of the USCIS appeal process, but assistance may be delayed during the period of the informal hearing process.

USCIS Appeal Process [24 CFR 5.514(e)]

When the PHA receives notification that the USCIS secondary verification failed to confirm eligible immigration status, the PHA must notify the family of the results of the USCIS verification. The family will have 30 days from the date of the notification to request an appeal of the USCIS results. The request for appeal must be made by the family in writing directly to the USCIS. The family must provide the PHA with a copy of the written request for appeal and the proof of mailing.

PHA Policy

The PHA will notify the family in writing of the results of the USCIS secondary verification within 10 business days of receiving the results.

The family must provide the PHA with a copy of the written request for appeal and proof of mailing within 10 business days of sending the request to the USCIS.

The family must forward to the designated USCIS office any additional documentation or written explanation in support of the appeal. This material must include a copy of the USCIS document verification request (used to process the secondary request) or such other form specified by the USCIS, and a letter indicating that the family is requesting an appeal of the USCIS immigration status verification results.

The USCIS will notify the family, with a copy to the PHA, of its decision. When the USCIS notifies the PHA of the decision, the PHA must notify the family of its right to request an informal hearing.

PHA Policy

The PHA will send written notice to the family of its right to request an informal hearing within 10 business days of receiving notice of the USCIS decision regarding the family's immigration status.

Informal Hearing Procedures for Applicants [24 CFR 5.514(f)]

After notification of the USCIS decision on appeal, or in lieu of an appeal to the USCIS, the family may request that the PHA provide a hearing. The request for a hearing must be made either within 30 days of receipt of the PHA notice of denial, or within 30 days of receipt of the USCIS appeal decision.

The informal hearing procedures for applicant families are described below.

Informal Hearing Officer

The PHA must provide an informal hearing before an impartial individual, other than a person who made or approved the decision under review, and other than a person who is a subordinate of the person who made or approved the decision. See Section 16-III.C. for a listing of positions that serve as informal hearing officers.

Evidence

The family must be provided the opportunity to examine and copy at the family's expense, at a reasonable time in advance of the hearing, any documents in the possession of the PHA pertaining to the family's eligibility status, or in the possession of the USCIS (as permitted by USCIS requirements), including any records and regulations that may be relevant to the hearing.

PHA Policy

The family will be allowed to copy any documents related to the hearing at a cost of \$.25 per page. The family must request discovery of PHA documents no later than 12:00 p.m. on the business day prior to the hearing.

The family must be provided the opportunity to present evidence and arguments in support of eligible status. Evidence may be considered without regard to admissibility under the rules of evidence applicable to judicial proceedings.

The family must also be provided the opportunity to refute evidence relied upon by the PHA, and to confront and cross-examine all witnesses on whose testimony or information the PHA relies.

Representation and Interpretive Services

The family is entitled to be represented by an attorney or other designee, at the family's expense, and to have such person make statements on the family's behalf.

The family is entitled to request an interpreter. Upon request, the PHA will provide competent interpretation services, free of charge.

Recording of the Hearing

The family is entitled to have the hearing recorded by audiotape. The PHA may but is not required to provide a transcript of the hearing.

PHA Policy

The PHA will not provide a transcript of an audio taped hearing.

Hearing Decision

The PHA must provide the family with a written final decision, based solely on the facts presented at the hearing, within 14 calendar days of the date of the informal hearing. The decision must state the basis for the decision.

Informal Hearing Procedures for Residents [24 CFR 5.514(f)]

After notification of the USCIS decision on appeal, or in lieu of an appeal to the USCIS, the family may request that the PHA provide a hearing. The request for a hearing must be made either within 30 days of receipt of the PHA notice of termination, or within 30 days of receipt of the USCIS appeal decision.

For the informal hearing procedures that apply to participant families whose assistance is being terminated based on immigration status, see Section 16-III.C.

Retention of Documents [24 CFR 5.514(h)]

The PHA must retain for a minimum of 5 years the following documents that may have been submitted to the PHA by the family, or provided to the PHA as part of the USCIS appeal or the PHA informal hearing process:

- The application for assistance
- The form completed by the family for income reexamination
- Photocopies of any original documents, including original USCIS documents
- The signed verification consent form
- The USCIS verification results
- The request for a USCIS appeal
- The final USCIS determination
- The request for an informal hearing
- The final informal hearing decision

PART IV: OWNER OR FAMILY DEBTS TO THE PHA

16-IV.A. OVERVIEW

PHAs are required to include in the administrative plan, policies concerning repayment by a family of amounts owed to the PHA [24 CFR 982.54]. If the family breaches an agreement with the PHA to pay amounts owed to a PHA, or amounts paid to an owner by a PHA, the PHA, at its discretion, may offer a family the opportunity to enter an agreement to pay amounts owed to a PHA or amounts paid to an owner by a PHA. The PHA may prescribe the terms of the agreement [24 CFR 982.552 (c)(1)(vii)]. This part describes the PHA's policies for recovery of monies owed to the PHA by families or owners.

PHA Policy

When an action or inaction of an owner or participant results in the overpayment of housing assistance, the PHA holds the owner or participant liable to return any overpayments to the PHA.

The PHA will enter into repayment agreements in accordance with the policies contained in this part as a means to recover overpayments.

16-IV.B. REPAYMENT POLICY

Owner Debts to the PHA

PHA Policy

Any amount due to the PHA by an owner must be repaid by the owner within 30 days of the PHA determination of the debt. **However, these debt payment plans can be handled on a case-by-case basis.**

If the owner fails to repay the debt within the required time frame and is entitled to future HAP payments, the PHA will reduce the future HAP payments by the amount owed until the debt is paid in full.

If the owner is not entitled to future HAP payments the PHA may, in its sole discretion, offer to enter into a repayment agreement on terms prescribed by the PHA.

If the owner refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA will ban the owner from future participation in the program and pursue other modes of collection.

When an owner or participant refuses to repay monies owed to the PHA, the PHA will utilize other available collection alternatives including, but not limited to, the following:

Collection agencies

Small claims court

Civil lawsuit

State income tax set-off program

OIG

Family Debts to the PHA

PHA Policy

Any amount owed to the PHA by an HCV family must be repaid by the family. If the family is unable to repay the debt within 30 days, the PHA will offer to enter into a repayment agreement in accordance with the policies below.

If the family refuses to repay the debt, does not enter into a repayment agreement, or breaches a repayment agreement, the PHA will terminate assistance in accordance with the policies in Chapter 12 and pursue other modes of collection.

Refusal to Enter into an Agreement

If the family refuses to repay the debt, or does not enter into a repayment agreement, or breaches a repayment agreement, the PHA must terminate assistance [Notice PIH 2018-18].

PHA Policy

When a family refuses to repay monies owed to the PHA, in addition to termination of program assistance, the PHA will utilize other available collection alternatives including, but not limited to, the following:

- Collection agencies
- Small claims court
- Civil lawsuit
- State income tax set-off program

Repayment Agreement [24 CFR 792.103]

The term *repayment agreement* refers to a formal written document signed by a tenant or owner and provided to the PHA in which a tenant or owner acknowledges a debt in a specific amount and agrees to repay the amount due at specific time periods.

General Repayment Agreement Guidelines for Families

Down Payment Requirement

PHA Policy

Before executing a repayment agreement with a family, the PHA will generally require a down payment of 10 percent of the total amount owed. If the family can provide evidence satisfactory to the PHA that a down payment of 10 percent would impose an undue hardship, the PHA may, in its sole discretion, require a lesser percentage or waive the requirement.

Payment Thresholds

Notice PIH 2017-12 recommends that the total amount that a family must pay each month—the family’s monthly share of rent plus the monthly debt repayment amount—should not exceed 40 percent of the family’s monthly adjusted income. However, a family may already be paying 40 per cent or more of its monthly adjusted income in rent. Moreover, Notice PIH 2017-12 acknowledges that PHAs have the discretion to establish “thresholds and policies” for repayment agreements with families [24 CFR 982.552(c)(1)(vii)].

PHA Policy

The PHA has established the following thresholds for repayment of debts:

Amounts between \$3,000 and the federal or state threshold for criminal prosecution must be repaid within 36 months.

Amounts between \$2,000 and \$2,999 must be repaid within 30 months.

Amounts between \$1,000 and \$1,999 must be repaid within 24 months.

Amounts under \$1,000 must be repaid within 12 months.

If a family can provide evidence satisfactory to the PHA that the threshold applicable to the family’s debt would impose an undue hardship, the PHA may, in its sole discretion, determine that a lower monthly payment amount is reasonable. In making its determination, the PHA will consider all relevant information, including the following:

The amount owed by the family to the PHA

The reason for the debt, including whether the debt was the result of family action/inaction or circumstances beyond the family’s control

The family’s current and potential income and expenses

The family’s current family share, as calculated under 24 CFR 982.515

The family’s history of meeting its financial responsibilities

Execution of the Agreement

All repayment agreements must be in writing, dated, and signed by both the family and the PHA [Notice PIH 2018-18].

PHA Policy

Any repayment agreement between the PHA and a family must be signed and dated by the PHA and by the head of household and spouse/cohead (if applicable) **as well as all other adults in the household.**

Due Dates

PHA Policy

All payments are due by the close of business on the 15th day of the month. If the 15th does not fall on a business day, the due date is the close of business on the first business day after the 15th.

Late or Missed Payments

PHA Policy

If a payment is not received by the end of the business day on the date due, and prior approval for the missed payment has not been given by the PHA, the PHA will send the family a delinquency notice giving the family 10 business days to make the late payment. If the payment is not received by the due date of the delinquency notice, it will be considered a breach of the agreement and the PHA will terminate assistance in accordance with the policies in Chapter 12.

If a family receives three delinquency notices for unexcused late payments in a 12-month period, the repayment agreement will be considered in default, and the PHA will terminate assistance in accordance with the policies in Chapter 12.

No Offer of Repayment Agreement

PHA Policy

The PHA generally will not enter into a repayment agreement with a family ~~if there is already a repayment agreement in place with the family or if the amount owed by the family exceeds the federal or state threshold for criminal prosecution.~~ under any of the following conditions:

The family is already under an existing repayment agreement with the PHA.

The PHA determines that the family's debt is a result of program abuse or fraud (as defined in Chapter 14 of this plan).

The amount owed by the family exceeds the federal or state threshold for criminal prosecution.

If the family can provide documented proof of \$0 income.

Repayment Agreement ~~Terms Involving Improper Payments~~

~~All repayment agreements must be in writing, dated, and signed by both the family and the PHA, include the total retroactive rent amount owed, any amount of lump sum payment made at time of execution, if applicable, and the monthly repayment amount.~~ Notice PIH 2017-12 requires certain provisions to be included in any repayment agreement involving amounts owed by a family because it underreported or failed to report income:

- A reference to the items in the family briefing packet that state the family's obligation to provide true and complete information at every reexamination and the grounds on which the PHA may terminate assistance because of a family's action or failure to act
- A statement clarifying that each month the family not only must pay to the PHA the monthly payment amount specified in the agreement but must also pay to the owner the family's monthly share of the rent to owner
- A statement that the terms of the repayment agreement may be renegotiated if the family's income decreases or increases
- A statement that late or missed payments constitute default of the repayment agreement and may result in termination of assistance

PART V: SECTION 8 MANAGEMENT ASSESSMENT PROGRAM (SEMAP)

16-V.A. OVERVIEW

The Section 8 Management Assessment Program (SEMAP) is a tool that allows HUD to measure PHA performance in key areas to ensure program integrity and accountability. SEMAP scores translate into a rating for each PHA as high performing, standard, or troubled. Scores on individual SEMAP indicators, as well as overall SEMAP ratings, can affect the PHA in several ways.

- High-performing PHAs can be given a competitive advantage under notices of funding availability [24 CFR 985.103].
- PHAs with deficiencies on one or more indicators are required to correct the deficiencies and report to HUD [24 CFR 985.106].
- PHAs with an overall rating of “troubled” are subject to additional HUD oversight, including on-site reviews by HUD staff, a requirement to develop a corrective action plan, and monitoring to ensure the successful implementation of the corrective action plan. In addition, PHAs that are designated “troubled” may not use any part of the administrative fee reserve for other housing purposes [24 CFR 985.107].
- HUD may determine that a PHA's failure to correct identified SEMAP deficiencies or to prepare and implement a corrective action plan required by HUD constitutes a default under the ACC [24 CFR 985.109].

16-V.B. SEMAP CERTIFICATION [24 CFR 985.101]

PHAs must submit the HUD-required SEMAP certification form within 60 calendar days after the end of its fiscal year. The certification must be approved by PHA board resolution and signed by the PHA executive director. If the PHA is a unit of local government or a state, a resolution approving the certification is not required, and the certification must be executed by the Section 8 program director.

PHAs with less than 250 voucher units are only required to be assessed every other PHA fiscal year. HUD will assess such PHAs annually if the PHA elects to have its performance assessed on an annual basis; or is designated as “troubled” [24 CFR 985.105].

Failure of a PHA to submit its SEMAP certification within the required time frame will result in an overall performance rating of “troubled.”

A PHA’s SEMAP certification is subject to HUD verification by an on-site confirmatory review at any time.

Upon receipt of the PHA’s SEMAP certification, HUD will rate the PHA’s performance under each SEMAP indicator in accordance with program requirements.

HUD Verification Method

Several of the SEMAP indicators are scored based on a review of a quality control sample selected for this purpose. The PHA or the Independent Auditor must select an unbiased sample that provides an adequate representation of the types of information to be assessed, in accordance with SEMAP requirements [24 CFR 985.2].

If the HUD verification method for the indicator relies on data in the Form-50058 module (formerly known as MTCS) in the PIH Information Center (PIC), and HUD determines that those data are insufficient to verify the PHA's certification on the indicator due to the PHA's failure to adequately report family data, HUD will assign a zero rating for the indicator [24 CFR 985.3].

16-V.C. SEMAP INDICATORS [24 CFR 985.3 and form HUD-52648]

The table below lists each of the SEMAP indicators, contains a description of each indicator, and explains the basis for points awarded under each indicator.

A PHA that expends less than \$300,000 in Federal awards and whose Section 8 programs are not audited by an independent auditor, is not be rated under SEMAP indicators 1-7.

SEMAP Indicators
Indicator 1: Selection from the waiting list Maximum Score: 15 • This indicator shows whether the PHA has written policies in its administrative plan for selecting applicants from the waiting list and whether the PHA follows these policies when selecting applicants for admission from the waiting list. • Points are based on the percent of families that are selected from the waiting list in accordance with the PHA's written policies, according to the PHA's quality control samples.
Indicator 2: Rent reasonableness Maximum Score: 20 • This indicator shows whether the PHA has and implements a reasonable written method to determine and document for each unit leased that the rent to owner is reasonable based on current rents for comparable unassisted units at the required times. • Points are based on the percent of units for which the PHA follows its written method to determine reasonable rent and has documented its determination that the rent to owner is reasonable, according to the PHA's quality control sample.
Indicator 3: Determination of adjusted income Maximum Score: 20 • This indicator measures whether the PHA verifies and correctly determines adjusted income for each assisted family, and where applicable, uses the appropriate utility allowances for the unit leased in determining the gross rent. • Points are based on the percent of files that are calculated and verified correctly, according to the PHA's quality control sample.
Indicator 4: Utility allowance schedule Maximum Score: 5 • This indicator shows whether the PHA maintains an up-to-date utility allowance schedule. • Points are based on whether the PHA has reviewed the utility allowance schedule and adjusted it when required, according to the PHA's certification.
Indicator 5: HQS quality control inspections Maximum Score: 5 • This indicator shows whether a PHA supervisor reinspects a sample of units under contract during the PHA fiscal year, which meets the minimum sample size requirements for quality control of HQS inspections. • Points are based on whether the required quality control reinspections were completed, according to the PHA's certification.

Indicator 6: HQS enforcement**Maximum Score: 10**

- This indicator shows whether, following each HQS inspection of a unit under contract where the unit fails to meet HQS any cited life-threatening deficiencies are corrected within 24 hours from the inspection and all other deficiencies are corrected within no more than 30 calendar days from the inspection or any PHA-approved extension.
- Points are based on whether the PHA corrects all HQS-deficiencies in accordance with required time frames, according to the PHA's certification.

Indicator 7: Expanding housing opportunities**Maximum Points: 5**

- Only applies to PHAs with jurisdiction in metropolitan FMR areas.
- This indicator shows whether the PHA has adopted and implemented a written policy to encourage participation by owners of units located outside areas of poverty or minority concentration; informs voucher holders of the full range of areas where they may lease units both inside and outside the PHA's jurisdiction; and supplies a list of landlords or other parties who are willing to lease units or help families find units, including units outside areas of poverty or minority concentration.
- Points are based on whether the PHA has adopted and implemented written policies in accordance with SEMAP requirements, according to the PHA's certification.

Indicator 8: FMR limit and payment standards**Maximum Points: 5 points**

- This indicator shows whether the PHA has adopted a payment standard schedule that establishes payment standard amounts by unit size for each FMR area in the PHA's jurisdiction, that are within the basic range of 90 to 110 percent of the published FMR.
- Points are based on whether the PHA has appropriately adopted a payment standard schedule(s), according to the PHA's certification.

Indicator 9: Annual reexaminations**Maximum Points: 10**

- This indicator shows whether the PHA completes a reexamination for each participating family at least every 12 months.
- Points are based on the percent of reexaminations that are more than 2 months overdue, according to data from PIC.

Indicator 10: Correct tenant rent calculations**Maximum Points: 5**

- This indicator shows whether the PHA correctly calculates the family's share of the rent to owner.
- Points are based on the percent of correct calculations of family share of the rent, according to data from PIC.

Indicator 11: Pre-contract HQS inspections**Maximum Points: 5**

- This indicator shows whether newly leased units pass HQS inspection on or before the effective date of the assisted lease and HAP contract.
- Points are based on the percent of newly leased units that passed HQS inspection prior to the effective date of the lease and HAP contract, according to data from PIC.

Indicator 12: Annual HQS inspections**Maximum Points: 10**

- This indicator shows whether the PHA inspects each unit under contract at least annually.
- Points are based on the percent of annual HQS inspections of units under contract that are more than 2 months overdue, according to data from PIC.

Indicator 13: Lease-up**Maximum Points: 20 points**

- This indicator shows whether the PHA enters HAP contracts for at least 98 percent of the number of the PHA's baseline voucher units in the ACC for the calendar year ending on or before the PHA's fiscal year, or whether the PHA has expended at least 98 percent of its allocated budget authority for the same calendar year. The PHA can receive 15 points if 95 to 97 percent of vouchers are leased or budget authority is utilized.
- Points are based on utilization of vouchers and HAP expenditures as reported in the voucher management system (VMS) for the most recently completed calendar year.

Indicator 14: Family self-sufficiency (FSS) enrollment and escrow account balances**Maximum Points: 10**

- Only applies to PHAs with mandatory FSS programs.
- This indicator shows whether the PHA has enrolled families in the FSS program as required, and measures the percent of current FSS participants that have had increases in earned income which resulted in escrow account balances.
- Points are based on the percent of mandatory FSS slots that are filled and the percent of families with escrow account balances, according to data from PIC.

Success Rate of Voucher Holders**Maximum Points: 5**

- Only applies to PHAs that have received approval to establish success rate payment standard amounts, and isn't effective until the second full PHA fiscal year following the date of HUD approval of success rate payment standard amounts.
- This indicator shows whether voucher holders were successful in leasing units with voucher assistance.
- Points are based on the percent of families that were issued vouchers, and that became participants in the voucher program.

Deconcentration Bonus Indicator**Maximum Points: 5**

- Submission of data for this indicator is mandatory for a PHA using one or more payment standard amount(s) that exceed(s) 100 percent of the published FMR set at the 50-percentile rent, starting with the second full PHA fiscal year following initial use of payment standard amounts based on the FMRs set at the 50th percentile.
- Additional points are available to PHAs that have jurisdiction in metropolitan FMR areas and that choose to submit the required data.
- Points are based on whether the data that is submitted meets the requirements for bonus points.

PART VI: RECORD KEEPING

16-VI.A. OVERVIEW

The PHA must maintain complete and accurate accounts and other records for the program in accordance with HUD requirements, in a manner that permits a speedy and effective audit. All such records must be made available to HUD or the Comptroller General of the United States upon request.

In addition, the PHA must ensure that all applicant and participant files are maintained in a way that protects an individual's privacy rights.

16-VI.B. RECORD RETENTION [24 CFR 982.158]

During the term of each assisted lease, and for at least three years thereafter, the PHA must keep:

- A copy of the executed lease;
- The HAP contract; and
- The application from the family.

In addition, the PHA must keep the following records for at least three years:

- Records that provide income, racial, ethnic, gender, and disability status data on program applicants and participants;
- An application from each ineligible family and notice that the applicant is not eligible;
- HUD-required reports;
- Unit inspection reports;
- Lead-based paint records as required by 24 CFR 35, Subpart B.
- Accounts and other records supporting PHA budget and financial statements for the program;
- Records to document the basis for PHA determination that rent to owner is a reasonable rent (initially and during the term of a HAP contract); and
- Other records specified by HUD.

The PHA must keep the last three years of the Form HUD-50058 and supporting documentation during the term of each assisted lease, and for a period of at least three years from the end of the participation (EOP) date [24 CFR 908.101]

The PHA must maintain Enterprise Income Verification (EIV) system Income Reports in the tenant file for the duration of the tenancy but for a period not to exceed three years from the EOP date [Notice PIH 2018-18].

Notice PIH 2014-20 requires PHAs to keep records of all complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act or the equal access final rule.

PHA Policy

The PHA will keep for at least three years records of all complaints, investigations, notices, and corrective actions related to violations of the Fair Housing Act, the equal access final rule, or VAWA.

The PHA must keep confidential records of all emergency transfer requested by victims of domestic violence, dating violence, sexual assault, ~~and~~ stalking, ~~and~~ human trafficking under the PHA's Emergency Transfer Plan, as well as the outcomes of such requests, and retain the records for a period of three years [24 CFR 5.2002(e)(12)].

If an informal hearing to establish a family's citizenship status is held, longer retention requirements apply for some types of documents. For specific requirements, see Section 16-III.D., Retention of Documents.

16-VLC. RECORDS MANAGEMENT

PHAs must maintain applicant and participant files and information in accordance with the regulatory requirements described below.

PHA Policy

All applicant and participant information will be kept in a secure location and access will be limited to authorized PHA staff.

PHA staff will not discuss personal family information unless there is a business reason to do so. Inappropriate discussion of family information or improper disclosure of family information by staff will result in disciplinary action.

Privacy Act Requirements [24 CFR 5.212 and Form-9886]

The collection, maintenance, use, and dissemination of social security numbers (SSN), employer identification numbers (EIN), any information derived from these numbers, and income information of applicants and participants must be conducted, to the extent applicable, in compliance with the Privacy Act of 1974, and all other provisions of Federal, State, and local law.

Applicants and participants, including all adults in the household, are required to sign a consent form, HUD-9886, Authorization for Release of Information. This form incorporates the Federal Privacy Act Statement and describes how the information collected using the form may be used, and under what conditions HUD or the PHA may release the information collected.

Upfront Income Verification (UIV) Records

PHAs that access UIV data through HUD's Enterprise Income Verification (EIV) system are required to adopt and follow specific security procedures to ensure that all EIV data is protected in accordance with federal laws, regardless of the media on which the data is recorded (e.g. electronic, paper). These requirements are contained in the HUD-issued document, *Enterprise Income Verification (EIV) System, Security Procedures for Upfront Income Verification data*.

PHA Policy

Prior to utilizing HUD's EIV system, the PHA will adopt and implement EIV security procedures required by HUD **requirements**.

Criminal Records

The PHA may only disclose the criminal conviction records which the PHA receives from a law enforcement agency to officers or employees of the PHA, or to authorized representatives of the PHA who have a job-related need to have access to the information [24 CFR 5.903(e)].

The PHA must establish and implement a system of records management that ensures that any criminal record received by the PHA from a law enforcement agency is maintained confidentially, not misused or improperly disseminated, and destroyed, once the purpose for which the record was requested has been accomplished, including expiration of the period for filing a challenge to the PHA action without institution of a challenge or final disposition of any such litigation [24 CFR 5.903(g)].

The PHA must establish and implement a system of records management that ensures that any sex offender registration information received by the PHA from a State or local agency is maintained confidentially, not misused or improperly disseminated, and destroyed, once the purpose for which the record was requested has been accomplished, including expiration of the period for filing a challenge to the PHA action without institution of a challenge or final disposition of any such litigation. However, a record of the screening, including the type of screening and the date performed must be retained [Notice PIH 2012-28]. This requirement does not apply to information that is public information or is obtained by a PHA other than under 24 CFR 5.905.

Medical/Disability Records

PHAs are not permitted to inquire about the nature or extent of a person's disability. The PHA may not inquire about a person's diagnosis or details of treatment for a disability or medical condition. If the PHA receives a verification document that provides such information, the PHA should not place this information in the tenant file. The PHA should destroy the document.

Documentation of Domestic Violence, Dating Violence, Sexual Assault, ~~or~~ Stalking, or Human Trafficking

For requirements and PHA policies related to management of documentation obtained from victims of domestic violence, dating violence, sexual assault, ~~or~~ stalking, or human trafficking see section 16-IX.E.

PART VII: REPORTING AND RECORD KEEPING FOR CHILDREN WITH ELEVATED BLOOD LEAD LEVEL

16-VII.A. OVERVIEW

The PHA has certain responsibilities relative to children with elevated blood lead levels that are receiving HCV assistance. The notification, verification, and hazard reduction requirements are discussed in Chapter 8. This part deals with the reporting requirements, and data collection and record keeping responsibilities that the PHA is subject to.

16-VII.B. REPORTING REQUIREMENT [24 CFR 35.1225(e); Notice PIH 2017-13]

The owner must report the name and address of a child identified as having an elevated blood lead level to the public health department within five business days of being so notified by any other medical health care professional. The owner must also notify the HUD field office and the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) of the child's address within five business days. The PHA may collaborate with the owner on the notification process, such as by agreeing with the owner to provide the required notifications on the owner's behalf.

PHA Policy

Upon notification by the owner, the PHA will provide the public health department with written notice of the name and address of any child identified as having an elevated blood lead level within five business days.

Upon notification by the owner, the PHA will notify the HUD field office and the HUD Office of Lead Hazard Control and Healthy Homes (OLHCHH) of the child's address within five business days.

16-VII.C. DATA COLLECTION AND RECORD KEEPING [24 CFR 35.1225(f)]

At least quarterly, the PHA must attempt to obtain from the public health department(s) with a similar area of jurisdiction, the names and/or addresses of children less than 6 years old with an elevated blood lead level.

If the PHA obtains names and addresses of elevated blood lead level children from the public health department(s), the PHA must match this information with the names and addresses of families receiving HCV assistance, unless the public health department performs such a procedure. If a match occurs, the PHA must carry out the notification, verification, and hazard reduction requirements discussed in Chapter 8, and the reporting requirement discussed above.

At least quarterly, the PHA must also report an updated list of the addresses of units receiving assistance under the HCV program to the same public health department(s), unless the public health department(s) states that it does not wish to receive such a report.

PHA Policy

~~The public health department(s) has stated they do not wish to receive a report of an updated list of the addresses of units receiving assistance under the HCV program, on a quarterly basis. Therefore, the PHA is not providing such a report.~~

The PHA provides an updated list of the addresses of units receiving assistance under the HCV program to the local public health department(s) on a quarterly basis. The reports are provided for the periods ending March 30th, June 30th, September 30th, and December 31st.

PART VIII: DETERMINATION OF INSUFFICIENT FUNDING

16-VIII.A. OVERVIEW

The HCV regulations allow PHAs to deny families permission to move and to terminate Housing Assistance Payments (HAP) contracts if funding under the consolidated ACC is insufficient to support continued assistance [24 CFR 982.354(e)(1) and 982.454]. If a PHA denies a family a portability move based on insufficient funding, the PHA is required to notify the local HUD office within 10 business days [24 CFR 982.354]. Insufficient funding may also impact the PHA's ability to issue vouchers to families on the waiting list. This part discusses the methodology the PHA will use to determine whether or not the PHA has sufficient funding to issue vouchers, approve moves, and to continue subsidizing all families currently under a HAP contract.

16-VIII.B. METHODOLOGY

PHA Policy

The PHA will determine whether there is adequate funding to issue vouchers, approve moves to higher cost units and areas, and continue subsidizing all current participants by comparing the PHA's annual budget authority to the annual total HAP needs on a monthly basis. The total HAP needs for the calendar year will be projected by establishing the actual HAP costs year to date. To that figure, the PHA will add anticipated HAP expenditures for the remainder of the calendar year. Projected HAP expenditures will be calculated by multiplying the projected number of units leased per remaining months by the most current month's average HAP. The projected number of units leased per month will take into account the average monthly turnover of participant families. If the total annual HAP needs equal or exceed the annual budget authority, or if the PHA cannot support the cost of the proposed subsidy commitment (voucher issuance or move) based on the funding analysis, the PHA will be considered to have insufficient funding.

PART IX: VIOLENCE AGAINST WOMEN ACT (VAWA): NOTIFICATION, DOCUMENTATION, CONFIDENTIALITY

16-IX.A. OVERVIEW

The Violence against Women Act of 2013 (VAWA) provides special protections for victims of domestic violence, dating violence, sexual assault ~~and~~ stalking ~~and~~ human trafficking who are applying for or receiving assistance under the housing choice voucher (HCV) program. If your state or local laws provide greater protection for such victims, those laws apply in conjunction with VAWA.

- Although the VAWA 2022 statute does not specially include human trafficking the list of victims protected under VAWA, in 2022 HUD began including human trafficking in the list of victims protected under VAWA (as seen in Notices PIH 2022-06; PIH 2022-22, and PIH 2022-24). In the absence of a final rule implementing VAWA 2022 and to mirror HUD's recent usage, this policy includes human trafficking in addition to domestic violence, dating violence, sexual assault, and stalking anywhere such a list appears.

In addition to definitions of key terms used in VAWA, this part contains general VAWA requirements and PHA policies in three areas: notification, documentation, and confidentiality. Specific VAWA requirements and PHA policies are located primarily in the following sections: 3-I.C, "Family Breakup and Remaining Member of Tenant Family"; 3-III.G, "Prohibition against Denial of Assistance to Victims of Domestic Violence, Dating Violence, ~~and~~ Stalking, ~~and~~ Human Trafficking"; 10-I.A, "Allowable Moves"; 10-I.B, "Restrictions on Moves"; 12-II.E, "Terminations Related to Domestic Violence, Dating Violence, ~~or~~ Stalking, ~~or~~ Human Trafficking"; and 12-II.F, "Termination Notice."

16-IX.B. DEFINITIONS [24 CFR 5.2003, 42 USC 13925]

As used in VAWA:

- The term *bifurcate* means, with respect to a public housing or Section 8 lease, to divide a lease as a matter of law such that certain tenants can be evicted or removed while the remaining family members' lease and occupancy rights are allowed to remain intact.
- The term *dating violence* means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship
 - The type of relationship
 - The frequency of interaction between the persons involved in the relationship
- The term *domestic violence* includes felony or misdemeanor crimes ~~of violence~~ committed by a current or former spouse or intimate partner of the victim, ~~by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim~~ under the domestic or family violence laws of the jurisdiction receiving grant funding, and in the case of victim services, includes the user or attempted use of physical

abuse or sexual abuse, or a pattern of any other coercive behavior committed, enabled, or solicited to gain or maintain power and control over a victim, including verbal, psychological, economic, or technological abuse that may or may not constitute criminal behavior, by a person who is: ~~monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.~~

- The current or former spouse or intimate partner of the victim or person similarly situated to a spouse or intimate partner of the victim
 - A person who is cohabitating or has cohabitated with the victim as a spouse or intimate partner
 - A person with whom the victim shares a child in common
 - A person who commits acts against a youth or adult victim who is protected from those acts under the domestic or family violence laws of the jurisdiction
- The term *economic abuse* means behavior that is coercive, deceptive, or unreasonably controls or restrains a person's ability to acquire, use or maintain economic resources to which they are entitled, including using coercion, fraud, and manipulation to:
 - Restrict a person's access to money, assets, credit, or financial information
 - Unfairly use a person's personal economic resources, including money, assets, and credit for one's own advantage
 - Exert undue influence over a person's financial and economic behavior or decisions, including forcing default on joint or other financial obligations, exploiting powers of attorney, guardianship, or conservatorship, or to whom one has a fiduciary duty.

- The term *affiliated individual* means, with respect to a person:
 - A spouse, parent, brother or sister, or child of that individual, or an individual to whom that individual stands in the position or place of a parent; or
 - Any other individual, tenant, or lawful occupant living in the household of the victim of domestic violence, dating violence, sexual assault, or stalking.
- The term *sexual assault* means:
 - Any nonconsensual sexual act proscribed by federal, tribal, or state law, including when the victim lacks the capacity to consent
- The term *stalking* means:
 - To engage in a course of conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others or suffer substantial emotional distress.
- The term *technological abuse* means an act or pattern of behavior that occurs within domestic violence, dating violence, sexual assault, or stalking and is intended to harm, threaten, intimidate, control, stalk, harass, impersonate, exploit, extort, or monitor another person, except as otherwise permitted by law, that occurs using any form of technology, including but not limited to:
 - Internet enabled devices
 - Online spaces and platforms
 - Computers
 - Mobile devices
 - Cameras and imaging programs
 - Apps
 - Location tracking devices
 - Communication technologies
 - Any other emergency technologies.

16-IX.C. NOTIFICATION [24 CFR 5.2005(a)]

Notification to Public

The PHA adopts the following policy to help ensure that all actual and potential beneficiaries of its HCV program are aware of their rights under VAWA.

PHA Policy

The PHA will post the following information regarding VAWA in its offices and on its website. It will also make the information readily available to anyone who requests it.

A copy of the notice of occupancy rights under VAWA to housing choice voucher program applicants and participants who are or have been victims of domestic violence, dating violence, sexual assault, or stalking (Form HUD-5380, see Exhibit 16-1)

A copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking and Alternate Documentation (see Exhibit 16-2)

A copy of the PHA's emergency transfer plan (Exhibit 16-3)

A copy of HUD's Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, Form HUD-5383 (Exhibit 16-4)

The National Domestic Violence Hot Line: 1-800-799-SAFE (7233) or 1-800-787-3224 (TTY) (included in Exhibits 16-1 and 16-2)

Contact information for local victim advocacy groups or service providers

Notification to Program Applicants and Participants [24 CFR 5.2005(a)(1)]

PHAs are required to inform program applicants and participants of their rights under VAWA, including their right to confidentiality and the limits thereof, when they are denied assistance, when they are admitted to the program, and when they are notified of an eviction or termination of housing benefits.

PHA Policy

The PHA will provide all applicants with information about VAWA at the time they request an application for housing assistance, as part of the written briefing packet, and at the time the family is admitted to the program. The PHA will also include information about VAWA in all notices of denial of assistance (see section 3-III.G).

The PHA will provide all participants with information about VAWA at the time of admission (see section 5-I.B) and at annual reexamination. The PHA will also include information about VAWA in notices of termination of assistance, as provided in section 12-II.F.

The VAWA information provided to applicants and participants will consist of the notices in Exhibits 16-1 and 16-2.

The PHA is not limited to providing VAWA information at the times specified in the above policy. If the PHA decides to provide VAWA information to a participant following an incident of domestic violence, Notice PIH 2017-08 cautions against sending the information by mail, since the abuser may be monitoring the mail. The notice recommends that in such cases the PHA make alternative delivery arrangements that will not put the victim at risk.

PHA Policy

Whenever the PHA has reason to suspect that providing information about VAWA to a participant might place a victim of domestic violence at risk, it will attempt to deliver the information by hand directly to the victim or by having the victim come to an office or other space that may be safer for the individual, making reasonable accommodations as necessary. For example, the PHA may decide not to send mail regarding VAWA protections to the victim's unit if the PHA believes the perpetrator may have access to the victim's mail, unless requested by the victim.

When discussing VAWA with the victim, the PHA will take reasonable precautions to ensure that no one can overhear the conversation, such as having conversations in a private room.

The victim may, but is not required to, designate an attorney, advocate, or other secure contact for communications regarding VAWA protections.

Notification to Owners and Managers

While PHAs are no longer required by regulation to notify owners and managers participating in the HCV program of their rights and obligations under VAWA, the PHA may still choose to inform them.

PHA Policy

The PHA will provide owners and managers with information about their rights and obligations under VAWA when they begin their participation in the program and at least annually thereafter.

The VAWA information provided to owners will consist of the notice in Exhibit 16-5 and a copy of form HUD-5382, Certification of Domestic Violence, Dating Violence, and Stalking and Alternate Documentation.

16-IX.D. DOCUMENTATION [24 CFR 5.2007]

A PHA presented with a claim for initial or continued assistance based on status as a victim of domestic violence, dating violence, sexual assault, stalking, **human trafficking** or criminal activity related to any of these forms of abuse may—but is not required to—request that the individual making the claim document the abuse. Any request for documentation must be in writing, and the individual must be allowed at least 14 business days after receipt of the request to submit the documentation. The PHA may extend this time period at its discretion. [24 CFR 5.2007(a)]

The individual may satisfy the PHA's request by providing any one of the following three forms of documentation [24 CFR 5.2007(b)]:

- (1) A completed and signed HUD-approved certification form (HUD-5382, Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), which must include the name of the perpetrator only if the name of the perpetrator is safe to provide and is known to the victim. The form may be filled out and submitted on behalf of the victim.
- (2) A federal, state, tribal, territorial, or local police report or court record, or an administrative record
- (3) Documentation signed by a person who has assisted the victim in addressing domestic violence, dating violence, sexual assault or stalking, **human trafficking**, or the effects of such abuse. This person may be an employee, agent, or volunteer of a victim service provider; an attorney; a mental health professional; or a medical professional. The person signing the documentation must attest under penalty of perjury to the person's belief that the incidents in question are bona fide incidents of abuse. The victim must also sign the documentation.

The PHA may not require third-party documentation (forms 2 and 3) in addition to certification (form 1), except as specified below under "Conflicting Documentation," nor may it require certification in addition to third-party documentation [VAWA final rule].

PHA Policy

Any request for documentation of domestic violence, dating violence, sexual assault or stalking, **or human trafficking** will be in writing, will specify a deadline of 14 business days following receipt of the request, will describe the three forms of acceptable documentation, will provide explicit instructions on where and to whom the documentation must be submitted, and will state the consequences for failure to submit the documentation or request an extension in writing by the deadline.

The PHA may, in its discretion, extend the deadline for 10 business days. In determining whether to extend the deadline, the PHA will consider factors that may contribute to the victim's inability to provide documentation in a timely manner, including cognitive limitations, disabilities, limited English proficiency, absence from the unit, administrative delays, the danger of further violence, and the victim's need to address health or safety issues. Any extension granted by the PHA will be in writing.

Once the victim provides documentation, the PHA will acknowledge receipt of the documentation within 10 business days.

Conflicting Documentation [24 CFR 5.2007(e)]

In cases where the PHA receives conflicting certification documents from two or more members of a household, each claiming to be a victim and naming one or more of the other petitioning household members as the perpetrator, the PHA may determine which is the true victim by requiring each to provide acceptable third-party documentation, as described above (forms 2 and 3). The PHA may also request third-party documentation when submitted documentation contains information that conflicts with existing information already available to the PHA. Individuals have 30 calendar days to return third-party verification to the PHA. If the PHA does not receive third-party documentation, and the PHA will deny or terminate assistance as a result, the PHA must hold separate hearings for the tenants [Notice PIH 2017-08].

The PHA must honor any court orders issued to protect the victim or to address the distribution of property.

PHA Policy

If presented with conflicting certification documents from members of the same household, the PHA will attempt to determine which is the true victim by requiring each of them to provide third-party documentation in accordance with 24 CFR 5.2007(e) and by following any HUD guidance on how such determinations should be made.

When requesting third-party documents, the PHA will provide contact information for local domestic violence and legal aid offices. In such cases, applicants or tenants will be given 30 calendar days from the date of the request to provide such documentation.

If the PHA does not receive third-party documentation within the required timeframe (and any extensions) the PHA will deny VAWA protections and will notify the applicant or tenant in writing of the denial. If, as a result, the applicant or tenant is denied or terminated from the program, the PHA will hold separate hearings for the applicants or tenants.

Discretion to Require No Formal Documentation [24 CFR 5.2007(d)]

The PHA has the discretion to provide benefits to an individual based solely on the individual's statement or other corroborating evidence—i.e., without requiring formal documentation of abuse in accordance with 24 CFR 5.2007(b). HUD recommends documentation in a confidential manner when a verbal statement or other evidence is accepted.

PHA Policy

If the PHA accepts an individual's statement or other corroborating evidence (as determined by the victim) of domestic violence, dating violence, sexual assault or stalking, the PHA will document acceptance of the statement or evidence in the individual's file.

Failure to Provide Documentation [24 CFR 5.2007(c)]

In order to deny relief for protection under VAWA, a PHA must provide the individual requesting relief with a written request for documentation of abuse. If the individual fails to provide the documentation within 14 business days from the date of receipt, or such longer time as the PHA may allow, the PHA may deny relief for protection under VAWA.

16-IX.E. CONFIDENTIALITY [24 CFR 5.2007(b)(4)]

All information provided to the PHA regarding domestic violence, dating violence, sexual assault or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence. This means that the PHA (1) may not enter the information into any shared database, (2) may not allow employees or others to access the information unless they are explicitly authorized to do so and have a need to know the information for purposes of their work, and (3) may not provide the information to any other entity or individual, except to the extent that the disclosure is (a) requested or consented to by the individual in writing, (b) required for use in an eviction proceeding, or (c) otherwise required by applicable law.

PHA Policy

If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, the PHA will inform the victim before disclosure occurs so that safety risks can be identified and addressed.

EXHIBIT 16-1: SAMPLE NOTICE OF OCCUPANCY RIGHTS UNDER THE VIOLENCE AGAINST WOMEN ACT, FORM HUD-5380

[Insert Name of Housing Provider]

Notice of Occupancy Rights under the Violence Against Women Act¹

To all Tenants and Applicants

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women but are available equally to all individuals regardless of sex, gender identity, or sexual orientation.² The U.S. Department of Housing and Urban Development (HUD) is the federal agency that oversees that the housing choice voucher program is in compliance with VAWA. This notice explains your rights under VAWA. A HUD-approved certification form is attached to this notice. You can fill out this form to show that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, and that you wish to use your rights under VAWA.”

Protections for Applicants

If you otherwise qualify for assistance under the housing choice voucher program, you cannot be denied admission or denied assistance because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Protections for Tenants

If you are receiving assistance under the housing choice voucher program, you may not be denied assistance, terminated from participation, or be evicted from your rental housing because you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

Also, if you or an affiliated individual of yours is or has been the victim of domestic violence, dating violence, sexual assault, or stalking by a member of your household or any guest, you may not be denied rental assistance or occupancy rights under the housing choice voucher program solely on the basis of criminal activity directly relating to that domestic violence, dating violence, sexual assault, or stalking.

Affiliated individual means your spouse, parent, brother, sister, or child, or a person to whom you stand in the place of a parent or guardian (for example, the affiliated individual is in your care, custody, or control); or any individual, tenant, or lawful occupant living in your household.

¹ Despite the name of this law, VAWA protection is available regardless of sex, gender identity, or sexual orientation.

² Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

Removing the Abuser or Perpetrator from the Household

The PHA may divide (bifurcate) your lease in order to evict the individual or terminate the assistance of the individual who has engaged in criminal activity (the abuser or perpetrator) directly relating to domestic violence, dating violence, sexual assault, or stalking.

If the PHA chooses to remove the abuser or perpetrator, the PHA may not take away the rights of eligible tenants to the unit or otherwise punish the remaining tenants. If the evicted abuser or perpetrator was the sole tenant to have established eligibility for assistance under the program, the PHA must allow the tenant who is or has been a victim and other household members to remain in the unit for a period of time, in order to establish eligibility under the program or under another HUD housing program covered by VAWA, or, find alternative housing.

In removing the abuser or perpetrator from the household, the PHA must follow federal, state, and local eviction procedures. In order to divide a lease, the PHA may, but is not required to, ask you for documentation or certification of the incidences of domestic violence, dating violence, sexual assault, or stalking.

Moving to Another Unit

Upon your request, the PHA may permit you to move to another unit, subject to the availability of other units, and still keep your assistance. In order to approve a request, the PHA may ask you to provide documentation that you are requesting to move because of an incidence of domestic violence, dating violence, sexual assault, or stalking. If the request is a request for emergency transfer, the housing provider may ask you to submit a written request or fill out a form where you certify that you meet the criteria for an emergency transfer under VAWA. The criteria are:

- 1. You are a victim of domestic violence, dating violence, sexual assault, or stalking.**

If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation, as described in the documentation section below.

- 2. You expressly request the emergency transfer.** Your housing provider may choose to require that you submit a form, or may accept another written or oral request.

- 3. You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit.** This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you expressly request the transfer.

The PHA will keep confidential requests for emergency transfers by victims of domestic violence, dating violence, sexual assault, or stalking, and the location of any move by such victims and their families.

The PHA's emergency transfer plan provides further information on emergency transfers, and the PHA must make a copy of its emergency transfer plan available to you if you ask to see it.

Documenting You Are or Have Been a Victim of Domestic Violence, Dating Violence, Sexual Assault or Stalking

The PHA can, but is not required to, ask you to provide documentation to "certify" that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking. Such request from the PHA must be in writing, and the PHA must give you at least 14 business days (Saturdays, Sundays, and federal holidays do not count) from the day you receive the request to provide the documentation. The PHA may, but does not have to, extend the deadline for the submission of documentation upon your request.

You can provide one of the following to the PHA as documentation. It is your choice which of the following to submit if the PHA asks you to provide documentation that you are or have been a victim of domestic violence, dating violence, sexual assault, or stalking.

- A complete HUD-approved certification form given to you by the PHA with this notice, that documents an incident of domestic violence, dating violence, sexual assault, or stalking. The form will ask for your name, the date, time, and location of the incident of domestic violence, dating violence, sexual assault, or stalking, and a description of the incident. The certification form provides for including the name of the abuser or perpetrator if the name of the abuser or perpetrator is known and is safe to provide.
- A record of a Federal, State, tribal, territorial, or local law enforcement agency, court, or administrative agency that documents the incident of domestic violence, dating violence, sexual assault, or stalking. Examples of such records include police reports, protective orders, and restraining orders, among others.
- A statement, which you must sign, along with the signature of an employee, agent, or volunteer of a victim service provider, an attorney, a medical professional or a mental health professional (collectively, "professional") from whom you sought assistance in addressing domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse, and with the professional selected by you attesting under penalty of perjury that he or she believes that the incident or incidents of domestic violence, dating violence, sexual assault, or stalking are grounds for protection.
- Any other statement or evidence that the PHA has agreed to accept.

If you fail or refuse to provide one of these documents within the 14 business days, the PHA does not have to provide you with the protections contained in this notice.

If the PHA receives conflicting evidence that an incident of domestic violence, dating violence, sexual assault, or stalking has been committed (such as certification forms from two or more members of a household each claiming to be a victim and naming one or more of the other petitioning household members as the abuser or perpetrator), the PHA has the right to request that you provide third-party documentation within thirty 30 calendar days in order to resolve the conflict. If you fail or refuse to provide third-party documentation where there is conflicting evidence, the PHA does not have to provide you with the protections contained in this notice.

Confidentiality

The PHA must keep confidential any information you provide related to the exercise of your rights under VAWA, including the fact that you are exercising your rights under VAWA.

The PHA must not allow any individual administering assistance or other services on behalf of the PHA (for example, employees and contractors) to have access to confidential information unless for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law.

The PHA must not enter your information into any shared database or disclose your information to any other entity or individual. The PHA, however, may disclose the information provided if:

- You give written permission to the PHA to release the information on a time limited basis.
- The PHA needs to use the information in an eviction or termination proceeding, such as to evict your abuser or perpetrator or terminate your abuser or perpetrator from assistance under this program.
- A law requires the PHA or your landlord to release the information.

VAWA does not limit the PHA's duty to honor court orders about access to or control of the property. This includes orders issued to protect a victim and orders dividing property among household members in cases where a family breaks up.

Reasons a Tenant Eligible for Occupancy Rights under VAWA May Be Evicted or Assistance May Be Terminated

You can be evicted and your assistance can be terminated for serious or repeated lease violations that are not related to domestic violence, dating violence, sexual assault, or stalking committed against you. However, the PHA cannot hold tenants who have been victims of domestic violence, dating violence, sexual assault, or stalking to a more demanding set of rules than it applies to tenants who have not been victims of domestic violence, dating violence, sexual assault, or stalking.

The protections described in this notice might not apply, and you could be evicted and your assistance terminated, if the PHA can demonstrate that not evicting you or terminating your assistance would present a real physical danger that:

1. Would occur within an immediate time frame, and
2. Could result in death or serious bodily harm to other tenants or those who work on the property.

If the PHA can demonstrate the above, the PHA should only terminate your assistance or evict you if there are no other actions that could be taken to reduce or eliminate the threat.

Other Laws

VAWA does not replace any federal, state, or local law that provides greater protection for victims of domestic violence, dating violence, sexual assault, or stalking. You may be entitled to additional housing protections for victims of domestic violence, dating violence, sexual assault, or stalking under other Federal laws, as well as under State and local laws.

Non-Compliance with The Requirements of This Notice

You may report a covered housing provider's violations of these rights and seek additional assistance, if needed, by contacting or filing a complaint **with the HUD field office.**

For Additional Information

You may view a copy of HUD's final VAWA rule at: <https://www.gpo.gov/fdsys/pkg/FR-2016-11-16/pdf/2016-25888.pdf>.

Additionally, the PHA must make a copy of HUD's VAWA regulations available to you if you ask to see them.

For questions regarding VAWA, please contact :[insert name of program or rental assistance contact information able to answer questions on VAWA].

For help regarding an abusive relationship, you may call the National Domestic Violence Hotline at 1-800-799-7233 or, for persons with hearing impairments, 1-800-787-3224 (TTY). You may also contact :[Insert contact information for relevant local organizations].

For tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

For help regarding sexual assault, you may contact: [Insert contact information for relevant organizations]

Victims of stalking seeking help may contact :[Insert contact information for relevant organizations].

Attachment: Certification form HUD-5382 :[form approved for this program to be included]

**EXHIBIT 16-2: CERTIFICATION OF DOMESTIC VIOLENCE, DATING VIOLENCE,
SEXUAL ASSAULT, OR STALKING AND ALTERNATE DOCUMENTATION,
FORM HUD-5382**

**CERTIFICATION OF
DOMESTIC VIOLENCE,
DATING VIOLENCE,
SEXUAL ASSAULT, OR STALKING,
AND ALTERNATE DOCUMENTATION**

**U.S. Department of Housing
and Urban Development**

OMB Approval No. 2577-0286
Exp. 06/30/2017

Purpose of Form: The Violence Against Women Act (“VAWA”) protects applicants, tenants, and program participants in certain HUD programs from being evicted, denied housing assistance, or terminated from housing assistance based on acts of domestic violence, dating violence, sexual assault, or stalking against them. Despite the name of this law, VAWA protection is available to victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

Use of This Optional Form: If you are seeking VAWA protections from your housing provider, your housing provider may give you a written request that asks you to submit documentation about the incident or incidents of domestic violence, dating violence, sexual assault, or stalking.

In response to this request, you or someone on your behalf may complete this optional form and submit it to your housing provider, or you may submit one of the following types of third-party documentation:

- (1) A document signed by you and an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional, or a mental health professional (collectively, “professional”) from whom you have sought assistance relating to domestic violence, dating violence, sexual assault, or stalking, or the effects of abuse. The document must specify, under penalty of perjury, that the professional believes the incident or incidents of domestic violence, dating violence, sexual assault, or stalking occurred and meet the definition of “domestic violence,” “dating violence,” “sexual assault,” or “stalking” in HUD’s regulations at 24 CFR 5.2003.
- (2) A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or
- (3) At the discretion of the housing provider, a statement or other evidence provided by the applicant or tenant.

Submission of Documentation: The time period to submit documentation is 14 business days from the date that you receive a written request from your housing provider asking that you provide documentation of the occurrence of domestic violence, dating violence, sexual assault, or stalking. Your housing provider may, but is not required to, extend the time period to submit the documentation, if you request an extension of the time period. If the requested information is not received within 14 business days of when you received the request for the documentation, or any extension of the date provided by your housing provider, your housing provider does not need to grant you any of the VAWA protections. Distribution or issuance of this form does not serve as a written request for certification.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking shall be kept confidential and such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections to you, and such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

**TO BE COMPLETED BY OR ON BEHALF OF THE VICTIM OF DOMESTIC VIOLENCE,
DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING**

1. Date the written request is received by victim: _____

2. Name of victim: _____

3. Your name (if different from victim's): _____

4. Name(s) of other family member(s) listed on the lease: _____

5. Residence of victim: _____

6. Name of the accused perpetrator (if known and can be safely disclosed): _____

7. Relationship of the accused perpetrator to the victim: _____

8. Date(s) and times(s) of incident(s) (if known): _____

10. Location of incident(s): _____

In your own words, briefly describe the incident(s):

This is to certify that the information provided on this form is true and correct to the best of my knowledge and recollection, and that the individual named above in Item 2 is or has been a victim of domestic violence, dating violence, sexual assault, or stalking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____

Public Reporting Burden: The public reporting burden for this collection of information is estimated to average 1 hour per response. This includes the time for collecting, reviewing, and reporting the data. The information provided is to be used by the housing provider to request certification that the applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking. The information is subject to the confidentiality requirements of VAWA. This agency may not collect this information, and you are not required to complete this form, unless it displays a currently valid Office of Management and Budget control number.

EXHIBIT 16-3: EMERGENCY TRANSFER PLAN FOR VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING (HCV VERSION)

Attachment: Certification form HUD-5382

**Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking
Housing Choice Voucher Program**

Emergency Transfers

The PHA is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),³ the PHA allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.⁴ The ability of the PHA to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether the PHA has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy.

This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the federal agency that oversees that the **public housing and housing choice voucher (HCV) programs** are in compliance with VAWA.

Eligibility for Emergency Transfers

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L, is eligible for an emergency transfer if the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

³Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

⁴Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Tenants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

Emergency Transfer Request Documentation

To request an emergency transfer, the tenant shall notify the PHA's management office and submit a written request for a transfer to **any PHA office**. The PHA will provide reasonable accommodations to this policy for individuals with disabilities. The tenant's written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under the PHA's program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

Confidentiality

The PHA will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives the PHA written permission to release the information on a time-limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person or persons that committed an act of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence against Women Act for All Tenants for more information about the PHA's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

Emergency Transfer Timing and Availability

The PHA cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. The PHA will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. The PHA may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If the PHA has no safe and available units for which a tenant who needs an emergency transfer is eligible, the PHA will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant's request, the PHA will also assist tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

Emergency Transfers: Housing Choice Voucher (HCV) Program

Tenant-based assistance: If you are a participant in the tenant-based HCV program and request an emergency transfer as described in this plan, the PHA will assist you to move to a safe unit quickly using your existing voucher assistance. The PHA will make exceptions to program regulations restricting moves as required.

At your request, the PHA will refer you to organizations that may be able to further assist you.

Project-based assistance: If you are assisted under the project-based voucher (PBV) program, you may request an emergency transfer under the following programs for which you are not required to apply:

- Tenant-based voucher, if available
- Project-based assistance in the same project (if a vacant unit is available and you determine that the vacant unit is safe)
- Project-based assistance in another development owned by the PHA

Emergency transfers under VAWA will take priority over waiting list admissions for these types of assistance.

You may also request an emergency transfer under the following programs for which you are required to apply:

- Public housing program
- PBV assistance in another development not owned by the PHA
- **such as LIHTC or HOME]**

Emergency transfers will not take priority over waiting list admissions for these programs. At your request, the PHA will refer you to organizations that may be able to further assist you.

Safety and Security of Tenants

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Tenants who have been victims of sexual assault may call the Rape, Abuse, and Incest National Network's National Sexual Assault Hotline at 1-800-656-HOPE, or visit the online hotline at: <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at: <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.

Attachment: Local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking.

EXHIBIT 16-4: EMERGENCY TRANSFER REQUEST FOR CERTAIN VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING, FORM HUD-5383

**EMERGENCY TRANSFER
REQUEST FOR CERTAIN
VICTIMS OF DOMESTIC
VIOLENCE, DATING VIOLENCE,
SEXUAL ASSAULT, OR STALKING**

**U.S. Department of Housing
and Urban Development**

OMB Approval No. 2577-0286
Exp. 06/30/2017

Purpose of Form: If you are a victim of domestic violence, dating violence, sexual assault, or stalking, and you are seeking an emergency transfer, you may use this form to request an emergency transfer and certify that you meet the requirements of eligibility for an emergency transfer under the Violence Against Women Act (VAWA). Although the statutory name references women, VAWA rights and protections apply to all victims of domestic violence, dating violence, sexual assault or stalking. Using this form does not necessarily mean that you will receive an emergency transfer. See your housing provider's emergency transfer plan for more information about the availability of emergency transfers.

The requirements you must meet are:

(1) You are a victim of domestic violence, dating violence, sexual assault, or stalking.

If your housing provider does not already have documentation that you are a victim of domestic violence, dating violence, sexual assault, or stalking, your housing provider may ask you for such documentation. In response, you may submit Form HUD-5382, or any one of the other types of documentation listed on that Form.

(2) You expressly request the emergency transfer. Submission of this form confirms that you have expressly requested a transfer. Your housing provider may choose to require that you submit this form, or may accept another written or oral request. Please see your housing provider's emergency transfer plan for more details.

(3) You reasonably believe you are threatened with imminent harm from further violence if you remain in your current unit. This means you have a reason to fear that if you do not receive a transfer you would suffer violence in the very near future.

OR

You are a victim of sexual assault and the assault occurred on the premises during the 90-calendar-day period before you request a transfer. If you are a victim of sexual assault, then in addition to qualifying for an emergency transfer because you reasonably believe you are threatened with imminent harm from further violence if you remain in your unit, you may qualify for an emergency transfer if the sexual assault occurred on the premises of the property from which you are seeking your transfer, and that assault happened within the 90-calendar-day period before you submit this form or otherwise expressly request the transfer.

Submission of Documentation: If you have third-party documentation that demonstrates why you are eligible for an emergency transfer, you should submit that documentation to your housing provider if it is safe for you to do so. Examples of third party documentation include, but are not limited to: a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom you have sought assistance; a current restraining order; a recent court order or other court records; a law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts.

Confidentiality: All information provided to your housing provider concerning the incident(s) of domestic violence, dating violence, sexual assault, or stalking, and concerning your request for an emergency transfer shall be kept confidential. Such details shall not be entered into any shared database. Employees of your housing provider are not to have access to these details unless to grant or deny VAWA protections or an emergency transfer to you. Such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED BY OR ON BEHALF OF THE PERSON REQUESTING A TRANSFER

1. Name of victim requesting an emergency transfer: _____

2. Your name (if different from victim's) _____

3. Name(s) of other family member(s) listed on the lease: _____

4. Name(s) of other family member(s) who would transfer with the victim: _____

5. Address of location from which the victim seeks to transfer: _____

6. Address or phone number for contacting the victim: _____

7. Name of the accused perpetrator (if known and can be safely disclosed): _____

8. Relationship of the accused perpetrator to the victim: _____

9. Date(s), Time(s) and location(s) of incident(s): _____

10. Is the person requesting the transfer a victim of a sexual assault that occurred in the past 90 days on the premises of the property from which the victim is seeking a transfer? If yes, skip question 11. If no, fill out question 11. _____

11. Describe why the victim believes they are threatened with imminent harm from further violence if they remain in their current unit.

12. If voluntarily provided, list any third-party documentation you are providing along with this notice: _____

This is to certify that the information provided on this form is true and correct to the best of my knowledge, and that the individual named above in Item 1 meets the requirement laid out on this form for an emergency transfer. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Signature _____ Signed on (Date) _____

EXHIBIT 16-5: MODEL OWNER NOTIFICATION OF RIGHTS AND OBLIGATIONS

**NOTIFICATION OF YOUR RIGHTS AND
OBLIGATIONS UNDER THE VIOLENCE AGAINST WOMEN
ACT (VAWA)**

VAWA provides protections for Section 8 Housing Choice Voucher (HCV) and PBV applicants, tenants, and participants from being denied assistance on the basis or as a direct result of being a victim of domestic violence, dating violence, sexual assault, stalking **and human trafficking**.

Purpose

Many of VAWA's protections to victims of domestic violence, dating violence, sexual assault, stalking **and human trafficking** involve action by the public housing agency (PHA), but some situations involve action by owners of assisted housing. The purpose of this notice (herein called "Notice") is to explain your rights and obligations under VAWA, as an owner of housing assisted through [housing provider] HCV program. Each component of this Notice also provides citations to HUD's applicable regulations.

Denial of Tenancy

Protections for applicants: Owners cannot deny tenancy based on the applicant having been or currently being a victim of domestic violence, dating violence, sexual assault, stalking **and human trafficking**. However, the applicant must be otherwise eligible for tenancy. (See 24 Code of Federal Regulations (CFR) 982.452(b)(1).)

Eviction

Protections for HCV participants: Incidents or threats of domestic violence, dating violence, sexual assault, stalking **and human trafficking** will not be considered a serious or repeated lease violation by the victim, or good cause to terminate the tenancy of the victim (24 CFR 5.2005(c)). Protection also applies to criminal activity related directly to domestic violence, dating violence, sexual assault, stalking, **and human trafficking**, conducted by a member of a tenant's household or any guest or other person under the tenant's control, if the tenant or an affiliated individual of the tenant is the victim or threatened victim of such domestic violence, dating violence, sexual assault, stalking **and human trafficking** (24 CFR 5.2005(b)(2)).

Limitations of VAWA protections:

a. Nothing in the VAWA Final Rule limits the authority of an owner, when notified of a court order, to comply with a court order with respect to (24 CFR 5.2005(d)(1)):

- 1) The rights of access or control of property, including civil protection orders issued to protect a victim of domestic violence, dating violence, sexual assault, stalking, **and human trafficking** ; or
- 2) The distribution or possession of property among members of a household in a case.

b. Nothing in the VAWA Final Rule limits an owner from evicting a victim of domestic violence, dating violence, sexual assault, stalking, **and human trafficking**, for a lease violation that is not premised on an act of domestic violence, dating violence, sexual assault, stalking, **and human trafficking**, as long as the owner does not subject the victim to more demanding standards than other tenants when deciding whether to evict. (See 24 CFR 5.2005(d)(2).)

c. Nothing in the VAWA Final Rule limits an owner from evicting a tenant (including the victim of domestic violence, dating violence, sexual assault, stalking, **and human trafficking**) if the owner can

demonstrate an actual and imminent threat to other tenants or those employed at or providing services to the HCV property would be present if the tenant or lawful occupant is not evicted. (See 24 CFR 5.2005(d)(3).)

i. In this context, words, gestures, actions, or other indicators will be considered an “actual and imminent threat” if they meet the following standards: An actual and imminent threat consists of a physical danger that is real, would occur within an immediate time frame, and could result in death or serious bodily harm. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include: the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the length of time before the potential harm would occur. (See 24 CFR 5.2003.)

ii. Any eviction due to “actual and imminent threat” should be utilized by an owner only when there are no other actions that could be taken to reduce or eliminate the threat, including, but not limited to, transferring the victim to a different unit, barring the perpetrator from the property, contacting law enforcement to increase police presence or develop other plans to keep the property safe, or seeking other legal remedies to prevent the perpetrator from acting on a threat. Restrictions predicated on public safety cannot be based on stereotypes, but must be tailored to particularized concerns about individual residents. (See 24 CFR 5.2005(d)(4).)

Documentation of Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

If an applicant or tenant requests VAWA protection based on status as a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, the owner has the option to request that the victim document or provide written evidence to demonstrate that the violence occurred. However, nothing in HUD’s regulation requires a covered housing provider to request this documentation. (See 24 CFR 5.2007(b)(3).)

If the owner chooses to request this documentation, the owner must make such request in writing. The individual may satisfy this request by providing any one document type listed under 24 CFR 5.2007(b)(1):

- a. Form HUD-55383 (Self-Certification Form); or
- b. A document: 1) Signed by an employee, agent, or volunteer of a victim service provider, an attorney, or medical professional or a mental health professional (collectively, “professional”) from whom the victim has sought assistance relating to domestic violence, dating violence, sexual assault, stalking, or human trafficking, or the effects of abuse:
2) Signed by the applicant or tenant; and
3) That specifies, under penalty of perjury, that the professional believes in the occurrence of the incident of domestic violence, dating violence, sexual assault, stalking, or human trafficking that is the ground for protection and remedies under 24 CFR part 5, subpart L, and that the incident meets the applicable definition of domestic violence, dating violence, sexual assault, stalking, or human trafficking under 24 CFR 5.2003; or
- c. A record of a Federal, State, tribal, territorial or local law enforcement agency, court, or administrative agency; or
- d. At the discretion of a covered housing provider, a statement or other evidence provided by the applicant or tenant.

The owner must accept any of the above items (a – c). The owner has discretion to accept a statement or other evidence (d).

The owner is prohibited from requiring third-party documentation of the domestic violence, dating violence, sexual assault, stalking, or human trafficking, unless the submitted documentation contains conflicting information.

If the owner makes a written request for documentation, the owner may require submission of that documentation within 14 business days after the date that the individual received the written request for documentation. (24 CFR 5.2007(a)(2)). The owner may extend this time period at its discretion. During the 14 business day period and any granted extensions of that time, no adverse actions, such as evictions or terminations, can be taken against the individual requesting VAWA protection.

Once a victim provides documentation of domestic violence, dating violence, sexual assault, stalking, **and human trafficking**, the owner is encouraged to acknowledge receipt of the documentation in a timely manner.

If the applicant or tenant fails to provide documentation that meets the criteria in 24 CFR 5.2007 within 14 business days after receiving the written request for that documentation or within the designated extension period, nothing in VAWA Final Rule may be construed to limit the authority of the covered housing provider to:

- a. Deny admission by the applicant or tenant to the housing or program;
- b. Deny assistance under the covered housing program to the applicant or tenant;
- c. Terminate the participation of the tenant in the covered housing program; or
- d. Evict the tenant, or a lawful occupant that commits a violation of a lease.

An individual's failure to timely provide documentation of domestic violence, dating violence, sexual assault, stalking, **and human trafficking**, does not result in a waiver of the individual's right to challenge the denial of assistance or termination, nor does it preclude the individual's ability to raise an incident of domestic violence, dating violence, sexual assault, stalking, **or human trafficking** at eviction or termination proceedings.

Moves

A victim of domestic violence, dating violence, sexual assault, stalking, **and human trafficking**, may move in violation of their lease if the move is required to protect their safety. If a move results in the termination of the Housing Assistance Payment Contract, the lease is automatically terminated.

Lease Bifurcation

Owners may choose to bifurcate a lease, or remove a household member from a lease in order to evict, remove, terminate occupancy rights, or terminate assistance to such member who engages in criminal activity directly relating to domestic violence, dating violence, sexual assault, stalking, or **human trafficking** against an affiliated individual or other individual. (See 24 CFR 5.2009(a).) If an owner chooses to bifurcate the lease, the owner must comply with the reasonable time to establish eligibility under the covered housing program or find alternative housing following lease bifurcation provision in 24 CFR 5.2009(b). VAWA protections, including bifurcation, do not apply to guests or unreported members of a household or anyone else residing in a household who is not a tenant.

Eviction, removal, termination of occupancy rights, or termination of assistance must be effected in accordance with the procedures prescribed by federal, state, or local law for termination of leases.

To avoid unnecessary delay in the bifurcation process, HUD recommends that owners seek court-ordered eviction of the perpetrator pursuant to applicable laws. This process results in the underlying lease becoming null and void once the owner regains possession of the unit. The owner would then execute a new lease with the victim.

Evictions Due to “Actual and Imminent Threat” or Violations Not Premised on Abuse

The VAWA Final Rule generally prohibits eviction on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, stalking, **or human trafficking**, if the applicant or tenant otherwise qualifies for assistance, participation or occupancy. (See 24 CFR 5.2005.)

However, the VAWA Final Rule does not prohibit an owner from evicting a tenant for any violation not premised on an act of domestic violence, dating violence, sexual assault, stalking, **or human trafficking**, that is in question against the tenant or an affiliated individual of the tenant. Nor does the VAWA Final Rule prohibit an owner from evicting a tenant if the owner can demonstrate an actual and imminent threat to other tenants or those employed at or providing services to property of the owner would be present if that tenant or lawful occupant is not evicted or terminated from assistance. (See 5.2005(d)(2) and (3).)

In order to demonstrate an actual and imminent threat to other tenants or employees at the property, the covered housing provider must have objective evidence of words, gestures, actions, or other indicators that meet the standards in the following definition:

Actual and imminent threat refers to a physical danger that is real, would occur within an immediate time frame, and could result in death or serious bodily harm. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include:

- The duration of the risk;
- The nature and severity of the potential harm;
- The likelihood that the potential harm will occur; and
- The length of time before the potential harm would occur.

(See 24 CFR 5.2003 and 5.2005(d)(2).)

Confidentiality

Any information submitted to a covered housing provider under 24 CFR 5.2007, including the fact that an individual is a victim of domestic violence, dating violence, sexual assault, stalking, **or human trafficking**, must be maintained in strict confidence by the covered housing provider. (See 24 CFR 5.2007(c).)

Employees of the owner (or those within their employ, e.g., contractors) must not have access to the information unless explicitly authorized by the owner for reasons that specifically call for these individuals to have access to this information under applicable Federal, State, or local law (e.g., the information is needed by an employee to provide the VAWA protections to the victim).

The owner must not enter this information into any shared database, or disclose this information to any other entity or individual, except to the extent that disclosure is:

- a. Requested or consented to in writing by the individual (victim) in a time-limited release;
- b. Required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program; or
- c. Otherwise required by applicable law.

When communicating with the victim, owners must take precautions to ensure compliance with these confidentiality requirements.

Service Providers

[housing provider] has extensive relationships with local service providers. [housing provider] staff are available to provide referrals to shelters, counselors, and advocates. These resources are also provided in [insert name of housing provider] Annual and 5-Year Plan, Administrative Plan, VAWA Notice of Occupancy Rights, and Emergency Transfer Plan. A list of local service providers is attached to this Notice.

Definitions

Actual and imminent threat refers to a physical danger that is real, would occur within an immediate time frame, and could result in death or serious bodily harm. In determining whether an individual would pose an actual and imminent threat, the factors to be considered include: the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the length of time before the potential harm would occur.

Affiliated individual, with respect to an individual, means:

- (1) A spouse, parent, brother, sister, or child of that individual, or a person to whom that individual stands in the place of a parent or guardian (for example, the affiliated individual is a person in the care, custody, or control of that individual); or
- (2) Any individual, tenant, or lawful occupant living in the household of that individual.

Bifurcate means to divide a lease as a matter of law, subject to the permissibility of such process under the requirements of the applicable HUD-covered program and State or local law, such that certain tenants or lawful occupants can be evicted or removed and the remaining tenants or lawful occupants can continue to reside in the unit under the same lease requirements or as may be revised depending upon the eligibility for continued occupancy of the remaining tenants and lawful occupants.

Dating violence means violence committed by a person:

- (1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- (2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - (i) The length of the relationship;
 - (ii) The type of relationship; and
 - (iii) The frequency of interaction between the persons involved in the relationship.

Domestic violence includes felony or misdemeanor crimes ~~of violence~~ committed by a current or former spouse or intimate partner of the victim, ~~by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim~~ under the domestic or family violence laws of the jurisdiction receiving grant funding, and in the case of victim services, includes the user or attempted use of physical abuse or sexual abuse, or a pattern of any other coercive behavior committed, enabled, or solicited to gain or maintain power and control over a victim, including verbal, psychological, economic, or technological abuse that may or may not constitute criminal behavior, by a person who is: ~~monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.~~

- The current or former spouse or intimate partner of the victim or person similarly situated to a spouse or intimate partner of the victim
- A person who is cohabitation or has cohabitated with the victim as a spouse or intimate partner
- A person with whom the victim shares a child in common
- A person who commits acts against a youth or adult victim who is protected from those acts under the domestic or family violence laws of the jurisdiction

Sexual assault means any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent.

Stalking means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- (1) Fear for the person's individual safety or the safety of others; or
- (2) Suffer substantial emotional distress.

VAWA means the Violence Against Women Act of 1994, as amended (42 U.S.C. 13925 and 42 U.S.C. 14043e et seq.).

Attached:

Legal services and the domestic violence resources for the Metro area
Form HUD-5382 Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

[insert name of housing provider] VAWA Notice of Occupancy Rights

Chapter 17

PROJECT-BASED VOUCHERS

This chapter describes HUD regulations and PHA policies related to the project-based voucher (PBV) program in nine parts:

Part I: General Requirements. This part describes general provisions of the PBV program including maximum budget authority requirements, relocation requirements, and equal opportunity requirements.

Part II: PBV Owner Proposals. This part includes policies related to the submission and selection of owner proposals for PBV assistance. It describes the factors the PHA will consider when selecting proposals, the type of housing that is eligible to receive PBV assistance, the cap on assistance at projects receiving PBV assistance, subsidy layering requirements, site selection standards, and environmental review requirements.

Part III: Dwelling Units. This part describes requirements related to housing quality standards, the type and frequency of inspections, and housing accessibility for persons with disabilities.

Part IV: Rehabilitated and Newly Constructed Units. This part describes requirements and policies related to the development and completion of rehabilitated and newly constructed housing units that will be receiving PBV assistance.

Part V: Housing Assistance Payments Contract. This part discusses HAP contract requirements and policies including the execution, term, and termination of the HAP contract. In addition, it describes how the HAP contract may be amended and identifies provisions that may be added to the HAP contract at the PHA's discretion.

Part VI: Selection of PBV Program Participants. This part describes the requirements and policies governing how the PHA and the owner will select a family to receive PBV assistance.

Part VII: Occupancy. This part discusses occupancy requirements related to the lease, and describes under what conditions families are allowed or required to move. In addition, exceptions to the occupancy cap (which limits PBV assistance to 25 percent of the units in any project) are also discussed.

Part VIII: Determining Rent to Owner. This part describes how the initial rent to owner is determined, and how rent will be redetermined throughout the life of the HAP contract. Rent reasonableness requirements are also discussed.

Part IX: Payments to Owner. This part describes the types of payments owners may receive under this program.

PART I: GENERAL REQUIREMENTS

17-I.A. OVERVIEW [24 CFR 983.5; FR Notice 1/18/17; Notice PIH 2017-21]

The project-based voucher (PBV) program allows PHAs that already administer a tenant-based voucher program under an annual contributions contract (ACC) with HUD to take up to 20 percent of its authorized units and attach the funding to specific units rather than using it for tenant-based assistance [24 CFR 983.6]. PHAs may only operate a PBV program if doing so is consistent with the PHA's Annual Plan, and the goal of deconcentrating poverty and expanding housing and economic opportunities [42 U.S.C. 1437f(o)(13)].

PHA Policy

The PHA will operate a project-based voucher program using up to 20 percent of its authorized units for project-based assistance.

See Exhibit 17-1 for information on projects to which the PHA has attached PBV assistance.

PBV assistance may be attached to existing housing or newly constructed or rehabilitated housing [24 CFR 983.52]. If PBV units are already selected for project-based assistance either under an agreement to enter into HAP Contract (Agreement) or a HAP contract, the PHA is not required to reduce the number of these units if the number of authorized units is subsequently reduced. However, the PHA is responsible for determining the amount of budget authority that is available for project-based vouchers and ensuring that the amount of assistance that is attached to units is within the amounts available under the ACC, regardless of whether the PHA has vouchers available for project-basing [FR Notice 1/18/17].

Additional Project-Based Units [FR Notice 1/18/17; Notice PIH 2017-21; **FR Notice 1/24/22]**

The PHA may project-base an additional 10 percent of its units above the 20 percent program limit. The units may be distributed among one, all, or a combination of the categories as long as the total number of units does not exceed the 10 percent cap.

For units under a HAP contract that was first executed on or after April 18, 2017, units qualify under this exception if the units:

- Are specifically made available to house individuals and families that meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302) and contained in the Continuum of Care Interim Rule at 24 CFR 578.3.
- Are specifically made available to house families that are comprised of or include a veteran.
 - *Veteran* means an individual who has served in the United States Armed Forces.
- Provide supportive housing to persons with disabilities or elderly persons as defined in 24 CFR 5.403.
- Are located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year Estimates.

PBV units that house eligible youth receiving FUPY/FYI assistance are also covered by this 10 percent exception authority, if the units are under a HAP contract that became effective after December 27, 2020, and if the unit is occupied by an eligible youth receiving FUPY/FYI assistance. FYI TPV's that were awarded under Notice PIH 2019-20 are not part of this exception since PHAs are prohibited from project-basing FYI TPVs. Units added after December 27, 2020, through an amendment of a HAP contract that became effective after December 27, 2020, are eligible for this 10 percent exception authority. In contrast, units added after December 27, 2020, through an amendment of a HAP contract that became effective on or prior to December 27, 2020, are not eligible for this 10 percent exception authority [FR Notice 1/24/22]. See Chapter 19 for policies specific to project-basing FUPY vouchers.

Only units that are under a HAP contract that was first executed on or after April 18, 2017, are covered by the 10 percent exception.

PHA Policy

The PHA may project-base up to an additional 10 percent of its authorized units, up to 30 percent, in accordance with HUD regulations and requirements.

See Exhibit 17-1 for information on projects to which the PHA has attached PBV assistance.

~~The PHA will not set aside units above the 20 percent program limit.~~

Units Not Subject to the PBV Program Limitation [FR Notice 1/18/17]

PBV units under the RAD program and HUD-VASH PBV set-aside vouchers do not count toward the 20 percent limitation when PBV assistance is attached to them.

In addition, units that were previously subject to certain federal rent restrictions or were receiving another type of long-term housing subsidy provided by HUD are not subject to the cap. The unit must be covered under a PBV HAP contract that first became effective on or after April 18, 2017.

PHA Policy

The PHA may project-base units not subject to the 20 percent cap in accordance with HUD regulations and requirements.

~~The PHA will not project-base any units not subject to the 20 percent cap.~~

17-I.B. TENANT-BASED VS. PROJECT-BASED VOUCHER ASSISTANCE [24 CFR 983.2]

Much of the tenant-based voucher program regulations also apply to the PBV program. Consequently, many of the PHA policies related to tenant-based assistance also apply to PBV assistance. The provisions of the tenant-based voucher regulations that do not apply to the PBV program are listed at 24 CFR 983.2.

PHA Policy

Except as otherwise noted in this chapter, or unless specifically prohibited by PBV program regulations, the PHA policies for the tenant-based voucher program contained in this administrative plan also apply to the PBV program and its participants.

17-I.C. RELOCATION REQUIREMENTS [24 CFR 983.7]

Any persons displaced as a result of implementation of the PBV program must be provided relocation assistance in accordance with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA)[42 U.S.C. 4201-4655] and implementing regulations at 49 CFR part 24.

The cost of required relocation assistance may be paid with funds provided by the owner, local public funds, or funds available from other sources. PHAs may not use voucher program funds to cover relocation costs, except that PHAs may use their administrative fee reserve to pay for relocation expenses after all other program administrative expenses are satisfied, and provided that payment of the relocation benefits is consistent with state and local law. Use of the administrative fee for these purposes must also be consistent with other legal and regulatory requirements, including the requirement in 24 CFR 982.155 and other official HUD issuances.

The acquisition of real property for a PBV project is subject to the URA and 49 CFR part 24, subpart B. It is the responsibility of the PHA to ensure the owner complies with these requirements.

17-I.D. EQUAL OPPORTUNITY REQUIREMENTS [24 CFR 983.8]

The PHA must comply with all equal opportunity requirements under federal law and regulations in its implementation of the PBV program. This includes the requirements and authorities cited at 24 CFR 5.105(a). In addition, the PHA must comply with the PHA Plan certification on civil rights and affirmatively furthering fair housing, submitted in accordance with 24 CFR 903.7(o).

PART II: SELECTION OF PBV OWNER PROPOSALS

17-II.A. OVERVIEW

With certain exceptions, the PHA must describe the procedures for owner submission of PBV proposals and for PHA selection of PBV proposals [24 CFR 983.51]. Before selecting a PBV proposal, the PHA must determine that the PBV proposal complies with HUD program regulations and requirements, including a determination that the property is eligible housing [24 CFR 983.53 and 983.54], complies with the cap on the number of PBV units per project [24 CFR 983.56], and meets the site selection standards [24 CFR 983.57]. The PHA may not commit PBVs until or unless it has followed the proposal selection requirements defined in 24 CFR 983.51 [Notice PIH 2011-54].

17-II.B. OWNER PROPOSAL SELECTION PROCEDURES [24 CFR 983.51(b)]

The PHA must select PBV proposals in accordance with the selection procedures in the PHA administrative plan. The PHA must select PBV proposals by either of the following two methods.

- PHA request for PBV Proposals. The PHA may solicit proposals by using a request for proposals to select proposals on a competitive basis in response to the PHA request. The PHA may not limit proposals to a single site or impose restrictions that explicitly or practically preclude owner submission of proposals for PBV housing on different sites.
- The PHA may select proposal that were previously selected based on a competition. This may include selection of a proposal for housing assisted under a federal, state, or local government housing assistance program that was subject to a competition in accordance with the requirements of the applicable program, community development program, or supportive services program that requires competitive selection of proposals (e.g., HOME, and units for which competitively awarded LIHTCs have been provided), where the proposal has been selected in accordance with such program's competitive selection requirements within three years of the PBV proposal selection date, and the earlier competitive selection proposal did not involve any consideration that the project would receive PBV assistance. The PHA need not conduct another competition.

Units Selected Non-Competitively [FR Notice 1/18/17; Notice PIH 2017-21; 24 CFR 983.51(b)]

For certain public housing projects where the PHA has an ownership interest or control, the PHA may attach PBV assistance non-competitively without following one of the two processes above.

This exception applies when the PHA is engaged in an initiative to improve, develop, or replace a public housing property or site. The public housing units may either currently be in the public housing inventory or may have been removed from the public housing inventory within five years of the date on which the PHA entered into the AHAP or HAP.

If the PHA is planning rehabilitation or new construction on the project, a minimum threshold of \$25,000 per unit in hard costs must be expended.

If the PHA plans to replace public housing by attaching PBV assistance to existing housing in which the PHA has an ownership interest or control, then the \$25,000 per unit minimum threshold does not apply as long as the existing housing substantially complies with **NSPIRE standards HQS**.

The PHA must include in the administrative plan what work it plans to do on the property or site and how many PBV units will be added to the site.

PHA Policy

The PHA intends to project base units noncompetitively in order to replace public housing units in a project in which the PHA has an ownership interest or control at public housing developments which meet the requirements under HOTMA to select units non-competitively.

The PHA will detail the work it plans to do on the public housing property or site as well as how many units it plans to project-base at the property or site through the annual and/or five-year plan process.

The PHA will ensure that units are eligible for PBV assistance and meet all statutory and regulatory requirements for the PBV program. The existing housing will substantially comply with HQS, which the PHA defines as units with no life-threatening violations that will pass HQS the earlier of 2 months of PBV HAP contract execution or at the end of the construction period.

The following policies in this chapter on solicitation and selection of owner proposals do not apply to units selected under this option.

~~The PHA will not attach PBVs to projects owned by the PHA as described above.~~

Solicitation and Selection of PBV Proposals [24 CFR 983.51(c)]

PHA procedures for selecting PBV proposals must be designed and actually operated to provide broad public notice of the opportunity to offer PBV proposals for consideration by the PHA. The public notice procedures may include publication of the public notice in a local newspaper of general circulation and other means designed and actually operated to provide broad public notice. The public notice of the PHA request for PBV proposals must specify the submission deadline. Detailed application and selection information must be provided at the request of interested parties.

PHA Policy

PHA Request for Proposals for Rehabilitated and Newly Constructed Units

The PHA will advertise its request for proposals (RFP) for rehabilitated and newly constructed housing in the following newspapers and trade journals.

Omaha World Herald

El Perico

OHA Website.

The advertisement will state the number of vouchers available to be project-based, the type of units that will be considered, the submission deadline, and will note how to obtain the full RFP with information on the application and selection process. Advertisements will also contain a statement that participation in the PBV program requires compliance with Fair Housing and Equal Opportunity (FHEO) requirements.

In addition, the PHA will post the RFP and proposal submission and rating and ranking procedures on its electronic website.

The PHA will publish its advertisement in the newspapers and trade journals mentioned above for at least one day per week for three consecutive weeks. The advertisement will specify the number of units the PHA estimates that it will be able to assist under the funding the PHA is making available. Proposals will be due in the PHA office by close of business 30 calendar days from the date of the last publication.

In order for the proposal to be considered, the owner must submit the proposal to the PHA by the published deadline date, and the proposal must respond to all requirements as outlined in the RFP. Incomplete proposals will not be reviewed.

The PHA will rate and rank proposals for rehabilitated and newly constructed housing using the following criteria:

- Owner experience and capability to build or rehabilitate housing as identified in the RFP;

- Extent to which the project furthers the PHA goal of deconcentrating poverty and expanding housing and economic opportunities;

- If applicable, the extent to which services for special populations are provided on site or in the immediate area for occupants of the property; and

- In order to promote partially assisted projects, projects where less than 25 percent of the units will be assisted will be rated higher than projects where 25 percent or more of the units will be assisted. In the case of projects for occupancy by the elderly, persons with disabilities or families needing other services, the PHA will rate partially assisted projects on the percentage of units assisted. Projects with the lowest percentage of assisted units will receive the highest score.

PHA Requests for Proposals for Existing Housing Units

The PHA will advertise its request for proposals (RFP) for existing housing in the following newspapers and trade journals.

Omaha World Herald

OHA Website

The advertisement will state the number of vouchers available to be project-based, the type of units that will be considered, the submission deadline, and will note how to obtain the full RFP with information on the application and selection process. Advertisements will also contain a statement that participation in the PV program requires compliance with Fair housing and Equal Opportunity (FHEO) requirements.

In addition, the PHA will post the notice inviting such proposal submission and the rating and ranking procedures on its electronic web site.

The PHA will periodically publish its advertisement in the newspapers and trade journals mentioned above for at least one day per week for three consecutive weeks. The advertisement will specify the number of units the PHA estimates that it will be able to assist under the funding the PHA is making available. Owner proposals will be accepted on a first-come first-served basis and will be evaluated using the following criteria:

- Experience as an owner in the tenant-based voucher program and owner compliance with the owner's obligations under the tenant-based program;

- Extent to which the project furthers the PHA goal of deconcentrating poverty and expanding housing and economic opportunities;

- If applicable, extent to which services for special populations are provided on site or in the immediate area for occupants of the property; and

- Extent to which units are occupied by families that are eligible to participate in the PBV program.

PHA Selection of Proposals Subject to a Previous Competition under a Federal, State, or Local Housing Assistance Program

The PHA will accept proposals for PBV assistance from owners that were competitively selected under another federal, state or local housing assistance program, including projects that were competitively awarded Low-Income Housing Tax Credits on an ongoing basis.

The PHA may periodically advertise that it is accepting proposals, in the following newspapers and trade journals:

Omaha World Herald

OHA Website

The advertisement will state the number of vouchers available to be project-based, the type of units that will be considered, the submission deadline, and will note how to obtain the full RFP with information on the application and selection process. Advertisements will also contain a statement that participation in the PBV program requires compliance with Fair Housing and Equal Opportunity (FHEO) requirements.

In addition to, or in place of advertising, the PHA may also directly contact specific owners that have already been selected for Federal, state, or local housing assistance based on a previously held competition, to inform them of available PBV assistance.

Proposals will be reviewed on a first-come first-served basis. The PHA will evaluate each proposal on its merits using the following factors:

- Extent to which the project furthers the PHA goal of deconcentrating poverty and expanding housing and economic opportunities; and

- Extent to which the proposal complements other local activities such as the redevelopment of a public housing site under the HOPE VI program, the HOME program, CDBG activities, other development activities in a HUD-designated Enterprise Zone, Economic Community, Choice Neighborhood, or Renewal Community.

PHA-Owned Units [24 CFR 983.51(e), 983.59, FR Notice 1/18/17, and Notice PIH 2017-21]

A PHA-owned unit may be assisted under the PBV program only if the HUD field office or HUD-approved independent entity reviews the selection process and determines that the PHA-owned units were appropriately selected based on the selection procedures specified in the PHA administrative plan. This also applies to noncompetitive selections. If the PHA selects a proposal for housing that is owned or controlled by the PHA, the PHA must identify the entity that will review the PHA proposal selection process and perform specific functions with respect to rent determinations, the term of the HAP contract, and inspections.

In the case of PHA-owned units, the term of the HAP contract and any HAP contract renewal must be agreed upon by the PHA and a HUD-approved independent entity. In addition, an independent entity must determine the initial rent to owner, the redetermined rent to owner, and reasonable rent. Housing quality standards inspections must also be conducted by an independent entity.

The independent entity that performs these program services may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government) or another HUD-approved public or private independent entity.

PHA Policy

The PHA may submit a proposal for project-based housing that is owned or controlled by the PHA. If the proposal for PHA-owned housing is selected, the PHA will use an approved entity] to review the PHA selection process. The PHA will obtain HUD approval of the entity that will be selected before selecting the proposal for PHA-owned housing.

The PHA may only compensate the independent entity from PHA ongoing administrative fee income (including amounts credited to the administrative fee reserve). The PHA may not use other program receipts to compensate the independent entity for its services. The PHA and independent entity may not charge the family any fee for the appraisal, or the services provided by the independent entity.

PHA Notice of Owner Selection [24 CFR 983.51(d)]

The PHA must give prompt written notice to the party that submitted a selected proposal and must also give prompt public notice of such selection. Public notice procedures may include publication of public notice in a local newspaper of general circulation and other means designed and actually operated to provide broad public notice.

PHA Policy

Within 10 business days of the PHA making the selection, the PHA will notify the selected owner in writing of the owner's selection for the PBV program. The PHA will also notify in writing all owners that submitted proposals that were not selected and advise such owners of the name of the selected owner.

In addition, the PHA will publish its notice for selection of PBV proposals for two consecutive days in the same newspapers and trade journals the PHA used to solicit the proposals. The announcement will include the name of the owner that was selected for the PBV program. The PHA will also post the notice of owner selection on its electronic web site.

The PHA will make available to any interested party its rating and ranking sheets and documents that identify the PHA basis for selecting the proposal. These documents will be available for review by the public and other interested parties for one month after publication of the notice of owner selection. The PHA will not make available sensitive owner information that is privileged, such as financial statements and similar information about the owner.

The PHA will make these documents available for review at the PHA during normal business hours. The cost for reproduction of allowable documents will be \$.25 per page.

17-II.C. HOUSING TYPE [24 CFR 983.52]

The PHA may attach PBV assistance for units in existing housing or for newly constructed or rehabilitated housing developed under and in accordance with an agreement to enter into a housing assistance payments contract that was executed prior to the start of construction. A housing unit is considered an existing unit for purposes of the PBV program, if, at the time of notice of PHA selection, the units substantially comply with HQS. Units for which new construction or rehabilitation began after the owner's proposal submission but prior to the execution of the HAP do not subsequently qualify as existing housing. Units that were newly constructed or rehabilitated in violation of program requirements also do not qualify as existing housing.

The PHA must decide what housing type, new construction, rehabilitation, or existing housing, will be used to develop project-based housing. The PHA choice of housing type must be reflected in its solicitation for proposals.

17-II.D. PROHIBITION OF ASSISTANCE FOR CERTAIN UNITS

Ineligible Housing Types [24 CFR 983.53]

The PHA may not attach or pay PBV assistance to shared housing units; units on the grounds of a penal reformatory, medical, mental, or similar public or private institution; nursing homes or facilities providing continuous psychiatric, medical, nursing services, board and care, or intermediate care (except that assistance may be provided in assisted living facilities); units that are owned or controlled by an educational institution or its affiliate and are designated for occupancy by students; manufactured homes; and transitional housing. In addition, the PHA may not attach or pay PBV assistance for a unit occupied by an owner and the PHA may not select or enter into an agreement to enter into a HAP contract or HAP contract for a unit occupied by a family ineligible for participation in the PBV program. A member of a cooperative who owns shares in the project assisted under the PBV program is not considered an owner for purposes of participation in the PBV program. Finally, PBV assistance may not be attached to units for which construction or rehabilitation has started after the proposal submission and prior to the execution of an AHAP.

Subsidized Housing [24 CFR 983.54]

A PHA may not attach or pay PBV assistance to units in any of the following types of subsidized housing:

- A public housing unit;
- A unit subsidized with any other form of Section 8 assistance;
- A unit subsidized with any governmental rent subsidy;
- A unit subsidized with any governmental subsidy that covers all or any part of the operating costs of the housing;
- A unit subsidized with Section 236 rental assistance payments (except that a PHA may attach assistance to a unit subsidized with Section 236 interest reduction payments);
- A Section 202 project for non-elderly with disabilities;
- Section 811 project-based supportive housing for persons with disabilities;
- Section 202 supportive housing for the elderly;
- A Section 101 rent supplement project;
- A unit subsidized with any form of tenant-based rental assistance;
- A unit with any other duplicative federal, state, or local housing subsidy, as determined by HUD or the PHA in accordance with HUD requirements.

17-II.E. SUBSIDY LAYERING REQUIREMENTS [24 CFR 983.55, Notice PIH 2013-11, and FR Notice 2/28/20]

The subsidy layering review is intended to prevent excessive public assistance by combining (layering) housing assistance payment subsidy under the PBV program with other governmental housing assistance from federal, state, or local agencies, including assistance such as tax concessions or tax credits.

HUD requires new construction and rehabilitation housing that will include forms of governmental assistance other than PBVs to undergo a subsidy layering review (SLR) prior to entering into an Agreement to Enter into Housing Assistance Payments Contract (AHAP). Subsidy layering requirements do not apply to existing housing, when PBV is the only governmental assistance, or for projects already subject to a PBV HAP contract, even if the project is recapitalized with outside sources of funding.

When a PHA selects a new construction or rehabilitation project, the PHA must require information regarding all HUD and/or other federal, state, or local governmental assistance to be disclosed by the project owner using Form HUD-2880. Appendix A of FR Notice 2/28/20 contains a list of all required documentation.

Either HUD or a HUD-approved housing credit agency (HCA) in the PHA's jurisdiction performs the subsidy layering review. The PHA must request an SLR through their local HUD Field Office or, if eligible, through a participating HCA.

If the SLR request is submitted to an approved HCA, and the proposed project-based voucher assistance meets HUD subsidy layering requirements, the HCA must submit a certification to HUD and notify the PHA. The PHA may proceed to execute an AHAP at that time if the environmental approval is received.

The HAP contract must contain the owner's certification that the project has not received and will not receive (before or during the term of the HAP contract) any public assistance for acquisition, development, or operation of the housing other than assistance disclosed in the subsidy layering review in accordance with HUD requirements.

17-II.F. CAP ON NUMBER OF PBV UNITS IN EACH PROJECT

25 Percent per Project Cap [24 CFR 983.56, FR Notice 1/18/17, and Notice PIH 2017-21]

In general, the PHA may not select a proposal to provide PBV assistance for units in a project or enter into an agreement to enter into a HAP or a HAP contract to provide PBV assistance for units in a project, if the total number of dwelling units in the project that will receive PBV assistance during the term of the PBV HAP contract is more than the greater of 25 units or 25 percent of the number of dwelling units (assisted or unassisted) in the project.

Exceptions to 25% per Project Cap [FR Notice 1/18/17; Notice PIH 2017-21; **FR Notice 1/24/22]**

As of April 18, 2017, units are not counted against the 25 percent or 25-unit per project cap if:

- The units are exclusively for elderly families
- The units are for households eligible for supportive services available to all families receiving PBV assistance in the project
 - If the project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year estimates, the project cap is the greater of 25 units or 40 percent (instead of 25 percent) of the units in the project [FR Notice 7/14/17].

Housing Opportunity Through Modernization Act of 2016 (HOTMA) eliminated project cap exemption for projects that serve disabled families & modified exception for supportive services.

Under the Fostering Stable Housing Opportunities (FSHO) amendments, units exclusively made available to youth receiving FUPY/FYI assistance may be excepted from the project cap for HAP contracts first effective after December 27, 2020. For more information on excepted units for FUPY, see Chapter 19.

Projects where caps were implemented prior to HOTMA (HAP contracts executed prior to April 18, 2017) or FSHO (contract in effect on or prior to December 27, 2020) may continue to use the former exceptions and may renew HAP contracts under old requirements, unless PHA & owner agree to change the conditions of the HAP contract. However, this change may not be made if it would jeopardize an assisted family's eligibility for continued assistance in the project.

Supportive Services

PHAs must include in the PHA administrative plan the type of services offered to families for a project to qualify for the exception and the extent to which such services will be provided. As of April 18, 2017, the project must make supportive services available to all families receiving PBV assistance in the project, but the family does not actually have to accept and receive supportive services for the exception to apply to the unit, although the family must be eligible to receive the supportive services. It is not necessary that the services be provided at or by the project, but must be reasonably available to families receiving PBV assistance at the project and designed to help families in the project achieve self-sufficiency or live in the community as independently as possible. A PHA may not require participation in the supportive service as a condition of living in the excepted unit, although such services may be offered.

PHA Policy

Excepted units will be limited to units for elderly families.

Projects not Subject to a Project Cap [FR Notice 1/18/17; Notice PIH 2017-21]

PBV units that were previously subject to certain federal rent restrictions or receiving another type of long-term housing subsidy provided by HUD are exempt from the project cap. In other words, 100 percent of the units in these projects may receive PBV assistance.

PHA Policy

The PHA does not have any PBV units that are subject to the per project cap exception.

Promoting Partially Assisted Projects [24 CFR 983.56(c)]

A PHA may establish local requirements designed to promote PBV assistance in partially assisted projects. A *partially assisted project* is a project in which there are fewer units covered by a HAP contract than residential units [24 CFR 983.3].

A PHA may establish a per-project cap on the number of units that will receive PBV assistance or other project-based assistance in a multifamily project containing excepted units or in a single-family building. A PHA may also determine not to provide PBV assistance for excepted units, or the PHA may establish a per-project cap of less than 25 units or 25 percent of units.

PHA Policy:

Excepted units will be limited to units for elderly families.

Beyond that, the PHA will not impose any further cap on the number of PBV units assisted per project.

17-II.G. SITE SELECTION STANDARDS

Compliance with PBV Goals, Civil Rights Requirements, and ~~NSPIRE HQS~~-Site Standards [24 CFR 983.57(b)]

The PHA may not select a proposal for existing, newly constructed, or rehabilitated PBV housing on a site or enter into an agreement to enter into a HAP contract or HAP contract for units on the site, unless the PHA has determined that PBV assistance for housing at the selected site is consistent with the goal of deconcentrating poverty and expanding housing and economic opportunities. The standard for deconcentrating poverty and expanding housing and economic opportunities must be consistent with the PHA Plan under 24 CFR 903 and the PHA administrative plan.

In addition, prior to selecting a proposal, the PHA must determine that the site is suitable from the standpoint of facilitating and furthering full compliance with the applicable Civil Rights Laws, regulations, and Executive Orders, and that the site meets the ~~NSPIRE HQS~~ site and neighborhood standards at 24 CFR ~~5.703 982.401(I)~~.

PHA Policy

It is the PHA goal to select sites for PBV housing that provide for deconcentrating poverty and expanding housing and economic opportunities. In complying with this goal the PHA will limit approval of sites for PBV housing in census tracts that have poverty concentrations of 20 percent or less.

However, the PHA will grant exceptions to the 20 percent standard where the PHA determines that the PBV assistance will complement other local redevelopment activities designed to deconcentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20 percent, such as sites in:

- A census tract in which the proposed PBV development will be located in a HUD-designated Enterprise Zone, Economic Community, ~~Choice Neighborhood~~, or Renewal Community;

- A census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition and HOPE VI redevelopment;

- A census tract in which the proposed PBV development will be located is undergoing significant revitalization as a result of state, local, or federal dollars invested in the area;

- A census tract where new market rate units are being developed where such market rate units will positively impact the poverty rate in the area;

- A census tract where there has been an overall decline in the poverty rate within the past five years; or

- A census tract where there are meaningful opportunities for educational and economic advancement.

Existing and Rehabilitated Housing Site and Neighborhood Standards [24 CFR 983.57(d)]

The PHA may not enter into an agreement to enter into a HAP contract nor enter into a HAP contract for existing or rehabilitated housing until it has determined that the site complies with the HUD required site and neighborhood standards. The site must:

- Be adequate in size, exposure, and contour to accommodate the number and type of units proposed;
- Have adequate utilities and streets available to service the site;
- Promote a greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons;
- Be accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services equivalent to those found in neighborhoods consisting largely of unassisted similar units; and
- Be located so that travel time and cost via public transportation or private automobile from the neighborhood to places of employment is not excessive.

New Construction Site and Neighborhood Standards [24 CFR 983.57(e)]

In order to be selected for PBV assistance, a site for newly constructed housing must meet the following HUD required site and neighborhood standards:

- The site must be adequate in size, exposure, and contour to accommodate the number and type of units proposed;
- The site must have adequate utilities and streets available to service the site;
- The site must not be located in an area of minority concentration unless the PHA determines that sufficient, comparable opportunities exist for housing for minority families in the income range to be served by the proposed project outside areas of minority concentration or that the project is necessary to meet overriding housing needs that cannot be met in that housing market area;
- The site must not be located in a racially mixed area if the project will cause a significant increase in the proportion of minority to non-minority residents in the area.
- The site must promote a greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons;
- The neighborhood must not be one that is seriously detrimental to family life or in which substandard dwellings or other undesirable conditions predominate;
- The housing must be accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services equivalent to those found in neighborhoods consisting largely of unassisted similar units; and
- Except for housing designed for elderly persons, the housing must be located so that travel time and cost via public transportation or private automobile from the neighborhood to places of employment is not excessive.

17-II.H. ENVIRONMENTAL REVIEW [24 CFR 983.58]

The PHA activities under the PBV program are subject to HUD environmental regulations in 24 CFR parts 50 and 58. The *responsible entity* is responsible for performing the federal environmental review under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.). The PHA may not enter into an agreement to enter into a HAP contract nor enter into a HAP contract until it has complied with the environmental review requirements.

In the case of existing housing, the responsible entity that is responsible for the environmental review under 24 CFR part 58 must determine whether or not PBV assistance is categorically excluded from review under the National Environmental Policy Act and whether or not the assistance is subject to review under the laws and authorities listed in 24 CFR 58.5.

The PHA may not enter into an agreement to enter into a HAP contract or a HAP contract with an owner, and the PHA, the owner, and its contractors may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct real property or commit or expend program or local funds for PBV activities under this part, until the environmental review is completed.

The PHA must supply all available, relevant information necessary for the responsible entity to perform any required environmental review for any site. The PHA must require the owner to carry out mitigating measures required by the responsible entity (or HUD, if applicable) as a result of the environmental review.

PART III: DWELLING UNITS

17-III.A. OVERVIEW

This part identifies the special housing quality standards that apply to the PBV program, housing accessibility for persons with disabilities, and special procedures for conducting ~~NSPIRE housing quality standards~~ inspections.

17-III.B. NATIONAL STANDARDS FOR THE PHYSICAL INSPECTION OF REAL ESTATE ~~HOUSING QUALITY STANDARDS~~ [24 CFR 983.101]

~~The housing quality standards (HQS)~~ NSPIRE standards for the tenant-based program, including those for special housing types, generally apply to the PBV program. NSPIRE HQS requirements for shared housing, manufactured home space rental, and the homeownership option do not apply because these housing types are not assisted under the PBV program.

~~The physical condition standards at 24 CFR 5.703 do not apply to the PBV program.~~

Lead-based Paint [24 CFR 983.101(c)]

The lead-based paint requirements for the tenant-based voucher program do not apply to the PBV program. Instead, The Lead-based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations at 24 CFR part 35, subparts A, B, H, and R, apply to the PBV program.

17-III.C. HOUSING ACCESSIBILITY FOR PERSONS WITH DISABILITIES

The housing must comply with program accessibility requirements of section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and implementing regulations at 24 CFR part 8. The PHA must ensure that the percentage of accessible dwelling units complies with the requirements of section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as implemented by HUD's regulations at 24 CFR 8, subpart C.

Housing first occupied after March 13, 1991, must comply with design and construction requirements of the Fair Housing Amendments Act of 1988 and implementing regulations at 24 CFR 100.205, as applicable. (24 CFR 983.102)

17-III.D. INSPECTING UNITS

Pre-selection Inspection [24 CFR 983.103(a)]

The PHA must examine the proposed site before the proposal selection date. If the units to be assisted already exist, the PHA must inspect all the units before the proposal selection date and must determine whether the units substantially comply with **NSPIRE HQS**. To qualify as existing housing, units must substantially comply with **NSPIRE HQS** on the proposal selection date. However, the PHA may not execute the HAP contract until the units fully comply with **NSPIRE HQS**.

Pre-HAP Contract Inspections [24 CFR 983.103(b), FR Notice 1/18/17, and Notice PIH 2017-20]

The PHA must inspect each contract unit before execution of the HAP contract. The PHA may not provide assistance on behalf of the family until the unit fully complies with **NSPIRE HQS**, unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial **NSPIRE HQS** inspection as a result of only non-life-threatening conditions, or if the unit passed an alternative inspection.

PHA Policy

The PHA will not provide assistance on behalf of the family until the unit fully complies with **NSPIRE HQS**.

The PHA will approve tenancy in a unit when the unit fails the HQS inspection as a result of only non-life-threatening conditions. The owner must correct these deficiencies within 30 days of the written notice from the PHA.

Life-threatening conditions are defined in Section 8-I.C., Life-Threatening Conditions. Non-Life-threatening conditions are defined as any conditions that would fail to meet the Housing Quality Standards under 24 CFR 982.401 and do not meet the definition of life-threatening.

When non-life-threatening deficiencies are not remedied within 30 days of the PHA's written notice to the owner of the unit's failure to comply with HQS, the PHA will follow the same policies for abatement of HAP as it does for the tenant-based HCV program, which are outlined in Section 8.II.B, Initial HQS Inspection.

Turnover Inspections [24 CFR 983.103(c)]

Before providing assistance to a new family in a contract unit, the PHA must inspect the unit. The PHA may not provide assistance on behalf of the family until the unit fully complies with **NSPIRE HQS**.

Annual/Biennial Inspections [24 CFR 983.103(d); FR Notice 6/25/14]

At least once every 24 months during the term of the HAP contract (or at least triennially for small, rural PHAs), the PHA must inspect a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with **NSPIRE HQS**. Turnover inspections are not counted toward meeting this inspection requirement. The PHA also has the option in certain mixed finance

properties to rely on alternative inspections conducted at least triennially.

PHA Policy

The PHA will inspect once every 24 months a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with HQS.

~~The PHA will inspect on an annual basis a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with NSPIRE HQS.~~

If more than 20 percent of the sample of inspected contract units in a building fail the initial inspection, the PHA must reinspect 100 percent of the contract units in the building.

Alternative Inspections [24 CFR 983.103(g); Notice PIH 2016-05]

In the case of mixed-finance properties that are subject to alternative inspections, the PHA may rely upon an alternative inspection conducted at least triennially to demonstrate compliance with inspection requirements.

PHA Policy

The PHA will not rely on alternative inspection standards.

Other Inspections [24 CFR 983.103(e)]

The PHA must inspect contract units whenever needed to determine that the contract units comply with **NSPIRE HQS** and that the owner is providing maintenance, utilities, and other services in accordance with the HAP contract. The PHA must take into account complaints and any other information coming to its attention in scheduling inspections.

The PHA must conduct follow-up inspections needed to determine if the owner (or, if applicable, the family) has corrected an **NSPIRE deficiency HQS-violation** and must conduct inspections to determine the basis for exercise of contractual and other remedies for owner or family **violation of NSPIRE deficiencies HQS**.

In conducting PHA supervisory quality control **HQS** inspections, the PHA should include a representative sample of both tenant-based and project-based units.

Inspecting PHA-Owned Units [24 CFR 983.103(f)]

In the case of PHA-owned units, the inspections must be performed by an independent entity designated by the PHA and approved by HUD. The independent entity must furnish a copy of each inspection report to the PHA and to the HUD field office where the project is located. The PHA must take all necessary actions in response to inspection reports from the independent entity, including exercise of contractual remedies for violation of the HAP contract by the PHA-owner.

PART IV: REHABILITATED AND NEWLY CONSTRUCTED UNITS

17-IV.A. OVERVIEW [24 CFR 983.151]

There are specific requirements that apply to PBV assistance for newly constructed or rehabilitated housing that do not apply to PBV assistance in existing housing. This part describes the requirements unique to this type of assistance.

Housing selected for this type of assistance may not at a later date be selected for PBV assistance as existing housing.

17-IV.B. AGREEMENT TO ENTER INTO HAP CONTRACT

In order to offer PBV assistance in rehabilitated or newly constructed units, the PHA must enter into an agreement to enter into HAP contract (Agreement) with the owner of the property. The Agreement must be in the form required by HUD [24 CFR 983.152(b)]. The PHA may not enter into an Agreement if commencement of construction or rehabilitation has commenced after proposal submission [24 CFR 983.152(c)]. Construction begins when excavation or site preparation (including clearing of the land) begins for the housing. Rehabilitation begins with the physical commencement of rehabilitation activity on the housing.

In the Agreement the owner agrees to develop the PBV contract units to comply with **NSPIRE HQS**, and the PHA agrees that upon timely completion of such development in accordance with the terms of the Agreement, the PHA will enter into a HAP contract with the owner for the contract units [24 CFR 983.152(a)].

Content of the Agreement [24 CFR 983.152(d)]

At a minimum, the Agreement must describe the following features of the housing to be developed and assisted under the PBV program:

- Site and the location of the contract units;
- Number of contract units by area (size) and number of bedrooms and bathrooms;
- Services, maintenance, or equipment to be supplied by the owner without charges in addition to the rent;
- Utilities available to the contract units, including a specification of utility services to be paid by the owner and utility services to be paid by the tenant;
- An indication of whether or not the design and construction requirements of the Fair Housing Act and section 504 of the Rehabilitation Act of 1973 apply to units under the Agreement. If applicable, any required work item resulting from these requirements must be included in the description of work to be performed under the Agreement;
- Estimated initial rents to owner for the contract units;
- Description of the work to be performed under the Agreement. For rehabilitated units, the description must include the rehabilitation work write up and, where determined necessary by the PHA, specifications and plans. For new construction units, the description must include the working drawings and specifications.
- Any additional requirements for quality, architecture, or design over and above **NSPIRE HQS**.

Execution of the Agreement [24 CFR 983.153]

The Agreement must be executed promptly after PHA notice of proposal selection to the selected owner. The PHA may not enter into the Agreement if construction or rehabilitation has started after proposal submission. Generally, the PHA may not enter into the Agreement with the owner until the subsidy layering review is completed. Likewise, the PHA may not enter into the Agreement until the environmental review is completed and the PHA has received environmental approval. However, the PHA does not need to conduct a subsidy layering review in the case of a HAP contract for existing housing or if the applicable state or local agency has conducted such a review. Similarly, environmental reviews are not required for existing structures unless otherwise required by law or regulation.

PHA Policy

The PHA will enter into the Agreement with the owner within 10 business days of receiving both environmental approval and notice that subsidy layering requirements have been met, and before construction or rehabilitation work is started.

17-IV.C. CONDUCT OF DEVELOPMENT WORK

Labor Standards [24 CFR 983.154(b)]

If an Agreement covers the development of nine or more contract units (whether or not completed in stages), the owner and the owner's contractors and subcontractors must pay Davis-Bacon wages to laborers and mechanics employed in the development of housing. Further, these Davis-Bacon requirements apply to existing PBV units when the nature of any work to be performed either before the execution of the HAP contract or within 18 months after execution constitutes project development. Any development initiated on existing units within 18 months after the effective date of the HAP contract on projects with nine or more contract units triggers Davis-Bacon requirements.

The HUD- prescribed form of the Agreement will include the labor standards clauses required by HUD, such as those involving Davis-Bacon wage rates. The addendum to the HAP contract, Form HUD 5679, also includes the required labor standards clauses.

The owner, contractors, and subcontractors must also comply with the Contract Work Hours and Safety Standards Act, Department of Labor regulations in 29 CFR part 5, and other applicable federal labor relations laws and regulations. The PHA must monitor compliance with labor standards.

~~Equal Opportunity [24 CFR 983.154(c)]~~

~~The owner must comply with Section 3 of the Housing and Urban Development Act of 1968 and the implementing regulations at 24 CFR part 135. The owner must also comply with federal equal employment opportunity requirements.~~

Owner Disclosure [24 CFR 983.154(d) and (e)]

The Agreement and HAP contract must include a certification by the owner that the owner and other project principals are not on the U.S. General Services Administration list of parties excluded from federal procurement and non-procurement programs.

The owner must also disclose any possible conflict of interest that would be a violation of the Agreement, the HAP contract, or HUD regulations.

17-IV.D. COMPLETION OF HOUSING

The Agreement must specify the deadlines for completion of the housing, and the owner must develop and complete the housing in accordance with these deadlines. The Agreement must also specify the deadline for submission by the owner of the required evidence of completion.

Evidence of Completion [24 CFR 983.155(b)]

At a minimum, the owner must submit the following evidence of completion to the PHA in the form and manner required by the PHA:

- Owner certification that the work has been completed in accordance with HQS and all requirements of the Agreement; and
- Owner certification that the owner has complied with labor standards and equal opportunity requirements in development of the housing.

At the PHA's discretion, the Agreement may specify additional documentation that must be submitted by the owner as evidence of housing completion.

PHA Policy

The PHA will determine the need for the owner to submit additional documentation as evidence of housing completion on a case-by-case basis depending on the nature of the PBV project. The PHA will specify any additional documentation requirements in the Agreement to enter into HAP contract.

PHA Acceptance of Completed Units [24 CFR 983.156]

Upon notice from the owner that the housing is completed, the PHA must inspect to determine if the housing has been completed in accordance with the Agreement, including compliance with **NSPIRE standards HQS** and any additional requirements imposed under the Agreement. The PHA must also determine if the owner has submitted all required evidence of completion.

If the work has not been completed in accordance with the Agreement, the PHA must not enter into the HAP contract.

If the PHA determines the work has been completed in accordance with the Agreement and that the owner has submitted all required evidence of completion, the PHA must submit the HAP contract for execution by the owner and must then execute the HAP contract.

PART V: HOUSING ASSISTANCE PAYMENTS CONTRACT (HAP)

17-V.A. OVERVIEW

The PHA must enter into a HAP contract with an owner for units that are receiving PBV assistance. The purpose of the HAP contract is to provide housing assistance payments for eligible families. Housing assistance is paid for contract units leased and occupied by eligible families during the HAP contract term. With the exception of single-family scattered-site projects, a HAP contract shall cover a single project. If multiple projects exist, each project is covered by a separate HAP contract. The HAP contract must be in the form required by HUD [24 CFR 983.202(a)].

17-V.B. HAP CONTRACT REQUIREMENTS

Contract Information [24 CFR 983.203]

The HAP contract must specify the following information:

- The total number of contract units by number of bedrooms;
- The project's name, street address, city or county, state and zip code, block and lot number (if known), and any other information necessary to clearly identify the site and the building;
- The number of contract units in each building, the location of each contract unit, the area of each contract unit, and the number of bedrooms and bathrooms in each contract unit;
- Services, maintenance, and equipment to be supplied by the owner and included in the rent to owner;
- Utilities available to the contract units, including a specification of utility services to be paid by the owner (included in rent) and utility services to be paid by the tenant;
- Features provided to comply with program accessibility requirements of Section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR part 8;
- The HAP contract term;
- The number of units in any project that will exceed the 25 percent per project cap, which will be set aside for occupancy by qualifying families (elderly and/or disabled families and families receiving supportive services); and
- The initial rent to owner for the first 12 months of the HAP contract term.

Execution of the HAP Contract [24 CFR 983.204]

The PHA may not enter into a HAP contract until each contract unit has been inspected and the PHA has determined that the unit complies with the ~~Housing Quality Standards (HQS) NSPIRE standards~~, unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial ~~HQS inspection as a result of only non-life-threatening conditions where no life-threatening conditions are present~~. For existing housing, the HAP contract must be executed promptly after the PHA selects the owner proposal and inspects the housing units. For newly constructed or rehabilitated housing the HAP contract must be executed after the PHA has inspected the completed units and has determined that the units have been completed in accordance with the agreement to enter into HAP, and the owner furnishes all required evidence of completion.

PHA Policy

For existing housing, the HAP contract will be executed within 10 business days of the PHA determining that all units pass ~~inspection HQS~~.

For rehabilitated or newly constructed housing, the HAP contract will be executed within 10 business days of the PHA determining that the units have been completed in accordance with the agreement to enter into HAP, all units meet ~~NSPIRE standards HQS~~, and the owner has submitted all required evidence of completion.

Term of HAP Contract [24 CFR 983.205, FR Notice 1/18/17, and Notice PIH 2017-21]

The PHA may enter into a HAP contract with an owner for an initial term of no less than one year and no more than 20 years for each contract unit. The length of the term of the HAP contract for any contract unit may not be less than one year, nor more than 20 years. In the case of PHA-owned units, the term of the HAP contract must be agreed upon by the PHA and the independent entity approved by HUD [24 CFR 983.59(b)(2)].

PHA Policy

The term of all PBV HAP contracts will be negotiated with the owner on a case-by-case basis.

At the time of the initial HAP contract term or any time before expiration of the HAP contract, the PHA may extend the term of the contract for an additional term of up to 20 years if the PHA determines an extension is appropriate to continue providing affordable housing for low-income families. A HAP contract extension may not exceed 20 years. A PHA may provide for multiple extensions; however, in no circumstances may such extensions exceed 20 years, cumulatively. Extensions after the initial extension are allowed at the end of any extension term, provided that not more than 24 months prior to the expiration of the previous extension contract the PHA agrees to extend the term, and that such extension is appropriate to continue providing affordable housing for low-income families or to expand housing opportunities. Extensions after the initial extension term shall not begin prior to the expiration date of the previous extension term. Subsequent extensions are subject to the same limitations. All extensions must be on the form and subject to the conditions prescribed by HUD at the time of the extension. In the case of PHA-owned units, any extension of the term of the HAP contract must be agreed upon by the PHA and the independent entity approved by HUD [24 CFR 983.59(b)(2)].

PHA Policy

When determining whether or not to extend an expiring PBV contract, the PHA will consider several factors including, but not limited to:

The cost of extending the contract and the amount of available budget authority;

The condition of the contract units;

The owner's record of compliance with obligations under the HAP contract and lease(s);

Whether the location of the units continues to support the goals of deconcentrating poverty and expanding housing opportunities; and

Whether the funding could be used more appropriately for tenant-based assistance.

Termination by PHA [24 CFR 983.205(c) and FR Notice 1/18/17]

The HAP contract must provide that the term of the PHA's contractual commitment is subject to the availability of sufficient appropriated funding as determined by HUD or by the PHA in accordance with HUD instructions. For these purposes, sufficient funding means the availability of appropriations, and of funding under the ACC from such appropriations, to make full payment of housing assistance payments payable to the owner for any contract year in accordance with the terms of the HAP contract.

In times of insufficient funding, HUD requires that PHAs first take all cost-saving measures prior to failing to make payments under existing PBV HAP contracts.

If it is determined that there may not be sufficient funding to continue housing assistance payments for all contract units and for the full term of the HAP contract, the PHA may terminate the HAP contract by notice to the owner. The termination must be implemented in accordance with HUD instructions.

Termination by Owner [24 CFR 983.205(d)]

If in accordance with program requirements the amount of rent to an owner for any contract unit is reduced below the amount of the rent to owner at the beginning of the HAP contract term, the owner may terminate the HAP contract by giving notice to the PHA. In this case, families living in the contract units must be offered tenant-based assistance.

Statutory Notice Requirements: Contract Termination or Expiration [24 CFR 983.206, FR Notice 1/18/17, and Notice PIH 2017-21]

Not less than one year before the HAP contract terminates, or if the owner refuses to renew the HAP contract, the owner must notify the PHA and assisted tenants of the termination. The notice must be provided in the form prescribed by HUD. If the owner does not give timely notice, the owner must permit the tenants in assisted units to remain in their units for the required notice period with no increase in the tenant portion of their rent, and with no eviction as a result of the owner's inability to collect an increased tenant portion of rent. An owner may renew the terminating contract for a period of time sufficient to give tenants one-year advance notice under such terms as HUD may require.

Upon termination or expiration of the contract, a family living at the property is entitled to receive a tenant-based voucher. Tenant-based assistance would not begin until the owner's required notice period ends. The PHA must provide the family with a voucher and the family must also be given the option by the PHA and owner to remain in their unit with HCV tenant-based assistance as long as the unit complies with inspection and rent reasonableness requirements. The family must pay their total tenant payment (TTP) and any additional amount if the gross rent exceeds the applicable payment standard. The family has the right to remain in the project as long as the units are used for rental housing and are otherwise eligible for HCV assistance. The owner may not terminate the tenancy of a family that exercises its right to remain except for serious or repeated lease violations or other good cause. Families that receive a tenant-based voucher at the expiration or termination of the PBV HAP contract are not new admissions to the PHA HCV tenant-based program and are not subject to income eligibility requirements or any other admission requirements. If the family chooses to remain in their unit with tenant-based assistance, the family may do so regardless of whether the family share would initially exceed 40 percent of the family's adjusted monthly income.

Remedies for NSPIRE Deficiencies HQS Violations [24 CFR 983.208(b)]

The PHA may not make any HAP payment to the owner for a contract unit during any period in which the unit does not comply with NSPIRE standards HQS. If the PHA determines that a contract does not comply with NSPIRE standards HQS, the PHA may exercise any of its remedies under the HAP contract, for any or all of the contract units. Available remedies include termination of housing assistance payments, abatement or reduction of housing assistance payments, reduction of contract units, and termination of the HAP contract.

PHA Policy

The PHA will abate and terminate PBV HAP contracts for non-compliance with NSPIRE HQS in accordance with the policies used in the tenant-based voucher program. These policies are contained in Section 8-II.G., Enforcing Owner Compliance.

17-V.C. AMENDMENTS TO THE HAP CONTRACT

Substitution of Contract Units [24 CFR 983.207(a)]

At the PHA's discretion and subject to all PBV requirements, the HAP contract may be amended to substitute a different unit with the same number of bedrooms in the same project for a previously covered contract unit. Before any such substitution can take place, the PHA must inspect the proposed unit and determine the reasonable rent for the unit.

Addition of Contract Units [FR Notice 1/18/17 and Notice PIH 2017-21]

The PHA and owner may amend the HAP contract to add additional PBV contract units in projects that already have a HAP contract without having to fulfill the selection requirements found at 24 CFR 983.51(b) for those additional PBV units, regardless of when the HAP contract was signed. The additional PBV units, however, are still subject to the PBV program cap and individual project caps. Prior to attaching additional units without competition, the PHA must submit to the local field office information outlined in FR Notice 1/18/17. The PHA must also detail in the administrative plan their intent to add PBV units and the rationale for adding units to the specific PBV project.

PHA Policy

The PHA will add units to the contract on a case-by-case basis to ensure the availability of affordable housing as long as the addition of units does not exceed allowable project caps.

~~The PHA will not add contract units to the HAP contract.~~

17-V.D. HAP CONTRACT YEAR, ANNIVERSARY AND EXPIRATION DATES [24 CFR 983.207(b) and 983.302(e)]

The HAP contract year is the period of 12 calendar months preceding each annual anniversary of the HAP contract during the HAP contract term. The initial contract year is calculated from the first day of the first calendar month of the HAP contract term.

The annual anniversary of the HAP contract is the first day of the first calendar month after the end of the preceding contract year.

There is a single annual anniversary and expiration date for all units under a particular HAP contract, even in cases where contract units are placed under the HAP contract in stages (on different dates) or units are added by amendment. The anniversary and expiration dates for all units coincide with the dates for the contract units that were originally placed under contract.

17-V.E. OWNER RESPONSIBILITIES UNDER THE HAP CONTRACT [24 CFR 983.210]

When the owner executes the HAP contract s/he certifies that at such execution and at all times during the term of the HAP contract:

- All contract units are in good condition and the owner is maintaining the premises and contract units in accordance with **NSPIRE standards HQS**;
- The owner is providing all services, maintenance, equipment and utilities as agreed to under the HAP contract and the leases;
- Each contract unit for which the owner is receiving HAP, is leased to an eligible family referred by the PHA, and the lease is in accordance with the HAP contract and HUD requirements;
- To the best of the owner's knowledge the family resides in the contract unit for which the owner is receiving HAP, and the unit is the family's only residence;
- The owner (including a principal or other interested party) is not the spouse, parent, child, grandparent, grandchild, sister, or brother of any member of a family residing in a contract unit;
- The amount of the HAP the owner is receiving is correct under the HAP contract;
- The rent for contract units does not exceed rents charged by the owner for comparable unassisted units;
- Except for HAP and tenant rent, the owner has not received and will not receive any other payment or consideration for rental of the contract unit;
- The family does not own or have any interest in the contract unit (does not apply to family's membership in a cooperative); and
- Repair work on the project selected as an existing project that is performed after HAP execution within such post-execution period as specified by HUD may constitute development activity, and if determined to be development activity, the repair work undertaken shall be in compliance with Davis-Bacon wage requirements.

17-V.F. ADDITIONAL HAP REQUIREMENTS

Housing Quality and Design Requirements [24 CFR 983.101(e) and 983.208(a)]

The owner is required to maintain and operate the contract units and premises in accordance with **NSPIRE standards HQS**, including performance of ordinary and extraordinary maintenance. The owner must provide all the services, maintenance, equipment, and utilities specified in the HAP contract with the PHA and in the lease with each assisted family. In addition, maintenance, replacement and redecoration must be in accordance with the standard practice for the building as established by the owner.

The PHA may elect to establish additional requirements for quality, architecture, or design of PBV housing. Any such additional requirements must be specified in the Agreement to enter into a HAP contract and the HAP contract. These requirements must be in addition to, not in place of, compliance with **NSPIRE standards HQS**.

PHA Policy

The PHA will identify the need for any special features on a case-by-case basis depending on the intended occupancy of the PBV project. The PHA will specify any special design standards or additional requirements in the invitation for PBV proposals, the agreement to enter into HAP contract, and the HAP contract.

Vacancy Payments [24 CFR 983.352(b)]

At the discretion of the PHA, the HAP contract may provide for vacancy payments to the owner for a PHA-determined period of vacancy extending from the beginning of the first calendar month after the move-out month for a period not exceeding two full months following the move-out month. The amount of the vacancy payment will be determined by the PHA and cannot exceed the monthly rent to owner under the assisted lease, minus any portion of the rental payment received by the owner (including amounts available from the tenant's security deposit).

PHA Policy

~~The PHA will decide on a case-by-case basis if the PHA will provide vacancy payments to the owner. The HAP contract with the owner will contain any such agreement, including the amount of the vacancy payment and the period for which the owner will qualify for these payments.~~

~~The PHA will not provide vacancy payments to the owner.~~

PART VI: SELECTION OF PBV PROGRAM PARTICIPANTS

17-VI.A. OVERVIEW

Many of the provisions of the tenant-based voucher regulations [24 CFR 982] also apply to the PBV program. This includes requirements related to determining eligibility and selecting applicants from the waiting list. Even with these similarities, there are requirements that are unique to the PBV program. This part describes the requirements and policies related to eligibility and admission to the PBV program.

17-VI.B. ELIGIBILITY FOR PBV ASSISTANCE [24 CFR 983.251(a) and (b)]

The PHA may select families for the PBV program from those who are participants in the PHA's tenant-based voucher program and from those who have applied for admission to the voucher program. For voucher participants, eligibility was determined at original admission to the voucher program and does not need to be redetermined at the commencement of PBV assistance. For all others, eligibility for admission must be determined at the commencement of PBV assistance.

Applicants for PBV assistance must meet the same eligibility requirements as applicants for the tenant-based voucher program. Applicants must qualify as a family as defined by HUD and the PHA, have income at or below HUD-specified income limits, and qualify on the basis of citizenship or the eligible immigration status of family members [24 CFR 982.201(a) and 24 CFR 983.2(a)]. In addition, an applicant family must provide social security information for family members [24 CFR 5.216 and 5.218] and consent to the PHA's collection and use of family information regarding income, expenses, and family composition [24 CFR 5.230]. The PHA may also not approve a tenancy if the owner (including a principal or other interested party) of the unit is the parent, child, grandparent, grandchild, sister, or brother of any member of the family, unless needed as a reasonable accommodation. An applicant family must also meet HUD requirements related to current or past criminal activity.

PHA Policy

The PHA will determine an applicant family's eligibility for the PBV program in accordance with the policies in Chapter 3.

In-Place Families [24 CFR 983.251(b)]

An eligible family residing in a proposed PBV contract unit on the date the proposal is selected by the PHA is considered an “in-place family.” These families are afforded protection from displacement under the PBV rule. If a unit to be placed under contract (either an existing unit or a unit requiring rehabilitation) is occupied by an eligible family on the date the proposal is selected, the in-place family must be placed on the PHA’s waiting list. Once the family’s continued eligibility is determined (the PHA may deny assistance to an in-place family for the grounds specified in 24 CFR 982.552 and 982.553), the family must be given an absolute selection preference and the PHA must refer these families to the project owner for an appropriately sized PBV unit in the project. Admission of eligible in-place families is not subject to income targeting requirements.

This regulatory protection from displacement does not apply to families that are not eligible to participate in the program on the proposal selection date.

17-VLC. ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c)]

The PHA may establish a separate waiting list for PBV units, or it may use the same waiting list for both tenant-based and project-based assistance. The PHA may also merge the PBV waiting list with a waiting list for other assisted housing programs offered by the PHA. If the PHA chooses to offer a separate waiting list for PBV assistance, the PHA must offer to place applicants who are listed on the tenant-based waiting list on the waiting list for PBV assistance.

If a PHA decides to establish a separate PBV waiting list, the PHA may use a single waiting list for the PHA's whole PBV program, or it may establish separate waiting lists for PBV units in particular projects or buildings or for sets of such units.

PHA Policy

The PHA will ~~maintain establish and manage~~ separate waiting lists for ~~individual~~ projects or buildings that are receiving PBV assistance. ~~PHA will use owner-maintained PBV waiting lists for PBV buildings and projects. PHA will require that PBV property owners create and manage a PBV wait list for their site(s). PHA will accept referrals from building management to fill vacancies for PBV projects and buildings.~~

The PHA currently has waiting lists for the following PBV projects:

~~The PHA will use the owner maintained waitlist to receive applicants.~~

~~(If the PHA establishes a separate PBV waiting list, the PHA must offer to place applicants listed on the listing list for tenant-based vouchers on the waiting list for PBV assistance. If the PHA has multiple PBV projects aimed at serving specific populations establishing separate waiting lists for these projects may be necessary so that specific preferences for families needing these services can be provided for different projects/buildings. The PHA may place families referred by a PBV owner on its PBV waiting list.)~~

17-VLD. SELECTION FROM THE WAITING LIST [24 CFR 983.251(c)]

Applicants who will occupy units with PBV assistance must be selected from the PHA's waiting list. The PHA may establish selection criteria or preferences for occupancy of particular PBV units. The PHA may place families referred by the PBV owner on its PBV waiting list.

Income Targeting [24 CFR 983.251(c)(6)]

At least 75 percent of the families admitted to the PHA's tenant-based and project-based voucher programs during the PHA fiscal year from the waiting list must be extremely low-income families. The income targeting requirement applies to the total of admissions to both programs.

Units with Accessibility Features [24 CFR 983.251(c)(7)]

When selecting families to occupy PBV units that have special accessibility features for persons with disabilities, the PHA must first refer families who require such features to the owner.

Preferences [24 CFR 983.251(d), FR Notice 11/24/08]

The PHA may use the same selection preferences that are used for the tenant-based voucher program, establish selection criteria or preferences for the PBV program as a whole, or for occupancy of particular PBV developments or units. The PHA must provide an absolute selection preference for eligible in-place families as described in Section 17-VI.B. above.

The PHA may establish a selection preference for families who qualify for voluntary services, including disability-specific services, offered in conjunction with assisted units, provided that preference is consistent with the PHA plan. The PHA may not, however, grant a preference to a person with a specific disability [FR Notice 1/18/17].

In advertising such a project, the owner may advertise the project as offering services for a particular type of disability; however, the project must be open to all otherwise eligible disabled persons who may benefit from services provided in the project. In these projects, disabled residents may not be required to accept the particular services offered as a condition of occupancy.

If the PHA has projects with “excepted units” for elderly families or supportive services, the PHA must give preference to such families when referring families to these units [24 CFR 983.261(b); FR Notice 1/18/17].

PHA Policy

The PHA will provide a selection preference when required by the regulation (e.g., eligible in-place families, elderly families or units with supportive services, or mobility impaired persons for accessible units). The following additional preferences have been established for the following projects, buildings, or sets of units:

17-VI.E. OFFER OF PBV ASSISTANCE

Refusal of Offer [24 CFR 983.251(e)(3)]

The PHA is prohibited from taking any of the following actions against a family who has applied for, received, or refused an offer of PBV assistance:

- Refuse to list the applicant on the waiting list for tenant-based voucher assistance;
- Deny any admission preference for which the applicant qualifies;
- Change the applicant’s place on the waiting list based on preference, date, and time of application, or other factors affecting selection under the PHA’s selection policy;
- Remove the applicant from the tenant-based voucher waiting list.

Disapproval by Landlord [24 CFR 983.251(e)(2)]

If a PBV owner rejects a family for admission to the owner’s units, such rejection may not affect the family’s position on the tenant-based voucher waiting list.

Acceptance of Offer [24 CFR 983.252]

Family Briefing

When a family accepts an offer for PBV assistance, the PHA must give the family an oral briefing. The briefing must include information on how the program works and the responsibilities of the family and owner. In addition to the oral briefing, the PHA must provide a briefing packet that explains how the PHA determines the total tenant payment for a family, the family obligations under the program, and applicable fair housing information.

Persons with Disabilities

If an applicant family's head or spouse is disabled, the PHA must assure effective communication, in accordance with 24 CFR 8.6, in conducting the oral briefing and in providing the written information packet. This may include making alternative formats available (see Chapter 2). In addition, the PHA must have a mechanism for referring a family that includes a member with a mobility impairment to an appropriate accessible PBV unit.

Persons with Limited English Proficiency

The PHA should take reasonable steps to assure meaningful access by persons with limited English proficiency in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 (see Chapter 2).

17-VLF. OWNER SELECTION OF TENANTS

The owner is responsible for developing written tenant selection procedures that are consistent with the purpose of improving housing opportunities for very low-income families and reasonably related to program eligibility and an applicant's ability to fulfill their obligations under the lease. An owner must promptly notify in writing any rejected applicant of the grounds for any rejection [24 CFR 983.253(a)(2) and (a)(3)].

Leasing [24 CFR 983.253(a)]

During the term of the HAP contract, the owner must lease contract units to eligible families that are selected and referred by the PHA from the PHA's waiting list. The contract unit leased to the family must be the appropriate size unit for the size of the family, based on the PHA's subsidy standards.

Filling Vacancies [24 CFR 983.254(a)]

The owner must promptly notify the PHA of any vacancy or expected vacancy in a contract unit. After receiving such notice, the PHA must make every reasonable effort to promptly refer a sufficient number of families for the owner to fill such vacancies. The PHA and the owner must make reasonable efforts to minimize the likelihood and length of any vacancy. (

PHA Policy

The owner must notify the PHA in writing (mail, fax, or email) within five business days of learning about any vacancy or expected vacancy.

PHA will accept referrals from building management to fill vacancies for PBV projects and buildings.

~~The PHA will make every reasonable effort to refer families to the owner within 10 business days of receiving such notice from the owner.~~

Reduction in HAP Contract Units Due to Vacancies [24 CFR 983.254(b)]

If any contract units have been vacant for 120 or more days since owner notice of the vacancy, the PHA may give notice to the owner amending the HAP contract to reduce the number of contract units by subtracting the number of contract units (according to the bedroom size) that have been vacant for this period.

PHA Policy

If any contract units have been vacant for 120 days, the PHA will give notice to the owner that the HAP contract will be amended to reduce the number of contract units that have been vacant for this period. The PHA will provide the notice to the owner within 10 business days of the 120th day of the vacancy.

The amendment to the HAP contract will be effective the 1st day of the month following the date of the PHA's notice.

17-VLG. TENANT SCREENING [24 CFR 983.255]

PHA Responsibility

The PHA is not responsible or liable to the owner or any other person for the family's behavior or suitability for tenancy. However, the PHA may opt to screen applicants for family behavior or suitability for tenancy and may deny applicants based on such screening.

PHA Policy

The PHA will not conduct screening to determine a PBV applicant family's suitability for tenancy.

The PHA must provide the owner with an applicant family's current and prior address (as shown in PHA records) and the name and address (if known by the PHA) of the family's current landlord and any prior landlords.

In addition, the PHA may offer the owner other information the PHA may have about a family, including information about the tenancy history of family members or about drug trafficking and criminal activity by family members. The PHA must provide applicant families a description of the PHA policy on providing information to owners, and the PHA must give the same types of information to all owners.

The PHA may not disclose to the owner any confidential information provided in response to a request for documentation of domestic violence, dating violence, sexual assault, or stalking except at the written request or with the written consent of the individual providing the documentation [24 CFR 5.2007(a)(4)].

PHA Policy

The PHA will inform owners of their responsibility to screen prospective tenants and will provide owners with the required known name and address information, at the time of the turnover **HQS** inspection or before. The PHA will not provide any additional information to the owner, such as tenancy history, criminal history, etc Owner Responsibility

The owner is responsible for screening and selection of the family to occupy the owner's unit. When screening families the owner may consider a family's background with respect to the following factors:

- Payment of rent and utility bills;
- Caring for a unit and premises;
- Respecting the rights of other residents to the peaceful enjoyment of their housing;
- Drug-related criminal activity or other criminal activity that is a threat to the health, safety, or property of others; and
- Compliance with other essential conditions of tenancy.

PART VII: OCCUPANCY

17-VII.A. OVERVIEW

After an applicant has been selected from the waiting list, determined eligible by the PHA, referred to an owner and determined suitable by the owner, the family will sign the lease and occupancy of the unit will begin.

17-VII.B. LEASE [24 CFR 983.256]

The tenant must have legal capacity to enter a lease under state and local law. *Legal capacity* means that the tenant is bound by the terms of the lease and may enforce the terms of the lease against the owner.

Form of Lease [24 CFR 983.256(b)]

The tenant and the owner must enter into a written lease agreement that is signed by both parties. If an owner uses a standard lease form for rental units to unassisted tenants in the locality or premises, the same lease must be used for assisted tenants, except that the lease must include a HUD-required tenancy addendum. The tenancy addendum must include, word-for-word, all provisions required by HUD.

If the owner does not use a standard lease form for rental to unassisted tenants, the owner may use another form of lease, such as a PHA model lease.

The PHA may review the owner's lease form to determine if the lease complies with state and local law. If the PHA determines that the lease does not comply with state or local law, the PHA may decline to approve the tenancy.

PHA Policy

The PHA will not review the owner's lease for compliance with state or local law.

Lease Requirements [24 CFR 983.256(c)]

The lease for a PBV unit must specify all of the following information:

- The names of the owner and the tenant;
- The unit rented (address, apartment number, if any, and any other information needed to identify the leased contract unit);
- The term of the lease (initial term and any provision for renewal);
- The amount of the tenant rent to owner, which is subject to change during the term of the lease in accordance with HUD requirements;
- A specification of the services, maintenance, equipment, and utilities that will be provide by the owner; and
- The amount of any charges for food, furniture, or supportive services.

Tenancy Addendum [24 CFR 983.256(d)]

The tenancy addendum in the lease must state:

- The program tenancy requirements;
- The composition of the household as approved by the PHA (the names of family members and any PHA-approved live-in aide);
- All provisions in the HUD-required tenancy addendum must be included in the lease. The terms of the tenancy addendum prevail over other provisions of the lease.

Initial Term and Lease Renewal [24 CFR 983.256(f)]

The initial lease term must be for at least one year. The lease must provide for automatic renewal after the initial term of the lease in either successive definitive terms (e.g. month-to-month or year-to-year) or an automatic indefinite extension of the lease term. For automatic indefinite extension of the lease term, the lease terminates if any of the following occur:

- The owner terminates the lease for good cause
- The tenant terminates the lease
- The owner and tenant agree to terminate the lease
- The PHA terminates the HAP contract
- The PHA terminates assistance for the family

Changes in the Lease [24 CFR 983.256(e)]

If the tenant and owner agree to any change in the lease, the change must be in writing, and the owner must immediately give the PHA a copy of all changes.

The owner must notify the PHA in advance of any proposed change in the lease regarding the allocation of tenant and owner responsibilities for utilities. Such changes may only be made if approved by the PHA and in accordance with the terms of the lease relating to its amendment. The PHA must redetermine reasonable rent, in accordance with program requirements, based on any change in the allocation of the responsibility for utilities between the owner and the tenant. The redetermined reasonable rent will be used in calculation of the rent to owner from the effective date of the change.

Owner Termination of Tenancy [24 CFR 983.257]

With two exceptions, the owner of a PBV unit may terminate tenancy for the same reasons an owner may in the tenant-based voucher program (see Section 12-III.B. and 24 CFR 982.310). In the PBV program, terminating tenancy for “good cause” does not include doing so for a business or economic reason, or a desire to use the unit for personal or family use or other non-residential purpose.

Tenant Absence from the Unit [24 CFR 983.256(g) and 982.312(a)]

The lease may specify a maximum period of family absence from the unit that may be shorter than the maximum period permitted by PHA policy. According to program requirements, the family’s assistance must be terminated if they are absent from the unit for more than 180 consecutive days. PHA termination of assistance actions due to family absence from the unit are subject to 24 CFR 981.312, except that the unit is not terminated from the HAP contract if the family is absent for longer than the maximum period permitted.

Continuation of Housing Assistance Payments [24 CFR 982.258]

Housing assistance payments shall continue until the tenant rent equals the rent to owner. The cessation of housing assistance payments at such point will not affect the family's other rights under its lease, nor will such cessation preclude the resumption of payments as a result of later changes in income, rents, or other relevant circumstances if such changes occur within 180 days following the date of the last housing assistance payment by the PHA. After the 180-day period, the unit shall be removed from the HAP contract pursuant to 24 CFR 983.211.

PHA Policy

If a participating family receiving zero assistance experiences a change in circumstances that would result in a HAP payment to the owner, the family must notify the PHA of the change and request an interim reexamination before the expiration of the 180-day period.

Security Deposits [24 CFR 983.259]

The owner may collect a security deposit from the tenant. The PHA may prohibit security deposits in excess of private market practice, or in excess of amounts charged by the owner to unassisted tenants.

PHA Policy

The PHA will allow the owner to collect a security deposit amount **not to exceed one month’s rent** ~~the owner determines is appropriate.~~

When the tenant moves out of a contract unit, the owner, subject to state and local law, may use the security deposit, including any interest on the deposit, in accordance with the lease, as reimbursement for any unpaid tenant rent, damages to the unit, or other amounts owed by the tenant under the lease.

The owner must give the tenant a written list of all items charged against the security deposit and the amount of each item. After deducting the amount used to reimburse the owner, the owner must promptly refund the full amount of the balance to the tenant.

If the security deposit does not cover the amount owed by the tenant under the lease, the owner

may seek to collect the balance from the tenant. The PHA has no liability or responsibility for payment of any amount owed by the family to the owner.

17-VII.C. MOVES

Overcrowded, Under-Occupied, and Accessible Units [24 CFR 983.260]

If the PHA determines that a family is occupying a wrong size unit, based on the PHA's subsidy standards, or a unit with accessibility features that the family does not require, and the unit is needed by a family that does require the features, the PHA must promptly notify the family and the owner of this determination, and the PHA must offer the family the opportunity to receive continued housing assistance in another unit.

PHA Policy

The PHA will notify the family, and the owner of the family's need to move based on the occupancy of a wrong-size or accessible unit within 10 business days of the PHA's determination. The PHA will offer the family the following types of continued assistance in the following order, based on the availability of assistance:

 PBV assistance in the same building or project;

 PBV assistance in another project; and

 Tenant-based voucher assistance.

If the PHA offers the family a tenant-based voucher, the PHA must terminate the housing assistance payments for a wrong-sized or accessible unit at the earlier of the expiration of the term of the family's voucher (including any extension granted by the PHA) or the date upon which the family vacates the unit. If the family does not move out of the wrong-sized unit or accessible unit by the expiration of the term of the family's voucher, the PHA must remove the unit from the HAP contract.

If the PHA offers the family another form of assistance that is not a tenant-based voucher, and the family does not accept the offer, does not move out of the PBV unit within a reasonable time as determined by the PHA, or both, the PHA must terminate the housing assistance payments for the unit at the expiration of a reasonable period as determined by the PHA and remove the unit from the HAP contract.

PHA Policy

When the PHA offers a family another form of assistance that is not a tenant-based voucher, the family will be given 30 days from the date of the offer to accept the offer and move out of the PBV unit. If the family does not move out within this 30-day time frame, the PHA will terminate the housing assistance payments at the expiration of this 30-day period.

The PHA may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member.

Family Right to Move [24 CFR 983.261]

The family may terminate the lease at any time after the first year of occupancy. The family must give advance written notice to the owner in accordance with the lease and provide a copy of such notice to the PHA. If the family wishes to move with continued tenant-based assistance, the family must contact the PHA to request the rental assistance prior to providing notice to terminate the lease.

If the family terminates the lease in accordance with these requirements, the PHA is required to offer the family the opportunity for continued tenant-based assistance, in the form of a voucher or other comparable tenant-based rental assistance. If voucher or other comparable tenant-based assistance is not immediately available upon termination of the family's lease in the PBV unit, the PHA must give the family priority to receive the next available opportunity for continued tenant-based assistance.

If the family terminates the assisted lease before the end of the first year, the family relinquishes the opportunity for continued tenant-based assistance.

Emergency Transfers under VAWA [Notice PIH 2017-08]

Except where special consideration is needed for the project-based voucher program, the PHA will follow VAWA policies as outlined in Chapter 16 Part IX of this administrative plan, including using the Emergency Transfer Plan as the basis for PBV transfers under VAWA (Exhibit 16-4).

HUD requires that the PHA include policies that address when a victim has been living in a unit for less than a year or when a victim seeks to move sooner than a tenant-based voucher is available.

PHA Policy

When the victim of domestic violence, dating violence, sexual assault, stalking, **or human trafficking** has lived in the unit for less than one year, the PHA will provide several options for continued assistance.

The PHA will first try to transfer the participant to another PBV unit in the same development or transfer to a different development where the PHA has PBV units. The PHA will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible.

If no units are available for an internal transfer, or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may receive continued assistance through an external transfer to either tenant-based rental assistance (HCV) or assistance in the PHA's public housing program. Such a decision will be made by the PHA based on the availability of tenant-based vouchers and/or vacancies in public housing units. Such families must be selected from the waiting list for the applicable program. The PHA has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, stalking, **or human trafficking** in both its HCV and public housing programs in order to expedite this process. See Section 4-III.C. of this administrative plan.

If a victim wishes to move after a year of occupancy in the unit, but no tenant-based vouchers are available, the PHA will offer the participant an internal transfer to another PBV unit in the same development or a transfer to a different development where the PHA has PBV units. The PHA will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible.

If no units are available for an internal transfer, or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may receive continued assistance through an external transfer to the PHA's public housing program. The PHA has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, stalking, **and human trafficking** as part of the public housing ACOP in order to expedite this process.

17-VII.D. EXCEPTIONS TO THE OCCUPANCY CAP [24 CFR 983.262]

As of April 17, 2018, the PHA may not pay housing assistance under a PBV HAP contract for more than the greater of 25 units or 25 percent of the number of dwelling units in a project unless:

- The units are exclusively for elderly families
- The units are for households eligible for supportive services available to all families receiving PBV assistance in the project

If the project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year estimates, the project cap is the greater of 25 units or 40 percent (instead of 25 percent) of the units in the project [FR Notice 7/14/17].

If a family at the time of initial tenancy is receiving and while the resident of an excepted unit has received Family Self-Sufficiency (FSS) supportive services or any other service as defined by the PHA and successfully completes the FSS contract of participation or the supportive services requirement, the unit continues to count as an excepted unit for as long as the family resides in the unit. However, if the FSS family fails to successfully complete the FSS contract of participation or supportive services objective and consequently is no longer eligible for the supportive services, the family must vacate the unit within a reasonable period of time established by the PHA, and the PHA shall cease paying HAP on behalf of the family.

Further, when a family (or remaining members of a family) residing in an excepted unit no longer meets the criteria for a “qualifying family” because the family is no longer an elderly family due to a change in family composition, the PHA has the discretion to allow the family to remain in the excepted unit. If the PHA does not exercise this discretion, the family must vacate the unit within a reasonable period of time established by the PHA, and the PHA must cease paying housing assistance payments on behalf of the non-qualifying family.

Individuals in units with supportive services who choose to no longer participate in a service or who no longer qualify for services they qualified for at the time of initial occupancy cannot subsequently be denied continued housing opportunity because of this changed circumstance. A PHA or owner cannot determine that a participant’s needs exceed the level of care offered by qualifying services or require that individuals be transitioned to different projects based on service needs.

If the family fails to vacate the unit within the established time, the unit must be removed from the HAP contract unless the project is partially assisted, and it is possible for the HAP contract to be amended to substitute a different unit in the building in accordance with program requirements; or the owner terminates the lease and evicts the family. The housing assistance payments for a family residing in an excepted unit that is not in compliance with its family obligations to comply with supportive services requirements must be terminated by the PHA.

The PHA may allow a family that initially qualified for occupancy of an excepted unit based on elderly family status to continue to reside in a unit, where through circumstances beyond the control of the family (e.g., death of the elderly family member or long-term or permanent hospitalization or nursing care), the elderly family member no longer resides in the unit. In this case, the unit may continue to be counted as an excepted unit for as long as the family resides in that unit. Once the family vacates the unit, in order to continue as an excepted unit under the HAP contract, the unit must be made available to and occupied by a qualified family.

PHA Policy

The PHA will allow families who initially qualified to live in an excepted unit to remain when circumstances change due to circumstances beyond the remaining family members' control.

In all other cases, the PHA will provide written notice to the family and owner within 10 business days of making the determination. The family will be given 30 days from the date of the notice to move out of the PBV unit. If the family does not move out within this 30-day time frame, the PHA will terminate the housing assistance payments at the expiration of this 30-day period.

The PHA may make exceptions to this 30-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member.

PART VIII: DETERMINING RENT TO OWNER

17-VIII.A. OVERVIEW

The amount of the initial rent to an owner of units receiving PBV assistance is established at the beginning of the HAP contract term. Although for rehabilitated or newly constructed housing, the agreement to enter into HAP Contract (Agreement) states the estimated amount of the initial rent to owner, the actual amount of the initial rent to owner is established at the beginning of the HAP contract term.

During the term of the HAP contract, the rent to owner is redetermined at the owner's request in accordance with program requirements, and at such time that there is a five percent or greater decrease in the published FMR.

17-VIII.B. RENT LIMITS [24 CFR 983.301]

Except for certain tax credit units (discussed below), the rent to owner must not exceed the lowest of the following amounts:

- An amount determined by the PHA, not to exceed 110 percent of the applicable fair market rent (or any HUD-approved exception payment standard) for the unit bedroom size minus any utility allowance;
- The reasonable rent; or
- The rent requested by the owner.

Certain Tax Credit Units [24 CFR 983.301(c)]

For certain tax credit units, the rent limits are determined differently than for other PBV units. Different limits apply to contract units that meet all of the following criteria:

- The contract unit receives a low-income housing tax credit under the Internal Revenue Code of 1986;
- The contract unit is not located in a qualified census tract;
- There are comparable tax credit units of the same bedroom size as the contract unit in the same project, and the comparable tax credit units do not have any form of rental assistance other than the tax credit; and
- The tax credit rent exceeds 110 percent of the fair market rent or any approved exception payment standard;

For contract units that meet all of these criteria, the rent to owner must not exceed the lowest of:

- The tax credit rent minus any utility allowance;
- The reasonable rent; or
- The rent requested by the owner.

Definitions

A *qualified census tract* is any census tract (or equivalent geographic area defined by the Bureau of the Census) in which at least 50 percent of households have an income of less than 60 percent of Area Median Gross Income (AMGI), or where the poverty rate is at least 25 percent and where the census tract is designated as a qualified census tract by HUD.

Tax credit rent is the rent charged for comparable units of the same bedroom size in the project that also receive the low-income housing tax credit but do not have any additional rental assistance (e.g., tenant-based voucher assistance).

Reasonable Rent [24 CFR 983.301(e) and 983.302(c)(2)]

The PHA must determine reasonable rent in accordance with 24 CFR 983.303. The rent to owner for each contract unit may at no time exceed the reasonable rent, except in cases where the PHA has elected within the HAP contract not to reduce rents below the initial rent to owner and, upon redetermination of the rent to owner, the reasonable rent would result in a rent below the initial rent. However, the rent to owner must be reduced in the following cases:

- To correct errors in calculations in accordance with HUD requirements
- If additional housing assistance has been combined with PBV assistance after the execution of the initial HAP contract and a rent decrease is required pursuant to 24 CFR 983.55
- If a decrease in rent to owner is required based on changes in the allocation of the responsibility for utilities between owner and tenant

If the PHA has not elected within the HAP contract to establish the initial rent to owner as the rent floor, the rent to owner shall not at any time exceed the reasonable rent.

PHA Policy

The PHA will elect within the HAP contract not to reduce rents below the initial level, with the exception of circumstances listed in 24 CFR 983.302(c)(2). If, upon redetermination of the rent to owner, the reasonable rent would result in a rent below the initial rent, the PHA will use the higher initial rent to owner amount.

Use of FMRs, Exception Payment Standards, and Utility Allowances [24 CFR 983.301(f)]

When determining the initial rent to owner, the PHA must use the most recently published FMR in effect and the utility allowance schedule in effect at execution of the HAP contract. When redetermining the rent to owner, the PHA must use the most recently published FMR and the utility allowance schedule in effect at the time of redetermination. At its discretion, the PHA may for initial rent, use the amounts in effect at any time during the 30-day period immediately before the beginning date of the HAP contract, or for redeterminations of rent, the 30-day period immediately before the redetermination date.

Any HUD-approved exception payment standard amount under the tenant-based voucher program also applies to the project-based voucher program. HUD will not approve a different exception payment stand amount for use in the PBV program.

Likewise, the PHA may not establish or apply different utility allowance amounts for the PBV program. The same utility allowance schedule applies to both the tenant-based and project-based voucher programs.

PHA Policy

Upon written request by the owner, the PHA will consider using the FMR or utility allowances in effect during the 30-day period before the start date of the HAP, or redetermination of rent. The owner must explain the need to use the previous FMRs or utility allowances and include documentation in support of the request. The PHA will review and make a decision based on the circumstances and merit of each request.

In addition to considering a written request from an owner, the PHA may decide to use the FMR or utility allowances in effect during the 30-day period before the start date of the HAP, or redetermination of rent, if the PHA determines it is necessary due to PHA budgetary constraints.

Use of Small Area FMRs (SAFMRs) [24 CFR 888.113(h)]

While small area FMRs (SAFMRs) do not apply to PBV projects, PHAs that operate a tenant-based program under SAFMRs may apply SAFMRs to all future PBV HAP contracts. If the PHA adopts this policy, it must apply to all future PBV projects and the PHA's entire jurisdiction. The PHA and owner may not subsequently choose to revert back to use of the FMRs once the SAFMRs have been adopted, even if the PHA subsequently changes its policy.

Further, the PHA may apply SAFMRs to current PBV projects where the notice of owner selection was made on or before the effective date of PHA implementation, provided the owner is willing to mutually agree to doing so and the application is prospective. The PHA and owner may not subsequently choose to revert back to use of the FMRs once the SAFMRs have been adopted, even if the PHA subsequently changes its policy. If rents increase as a result of the use of SAFMRs, the rent increase may not be effective until the first anniversary of the HAP contract.

PHA Policy

The PHA will not apply SAFMRs to the PHA's PBV program.

Redetermination of Rent [24 CFR 983.302]

The PHA must redetermine the rent to owner upon the owner's request or when there is a 10 percent or greater decrease in the published FMR.

Rent Increase

If an owner wishes to request an increase in the rent to owner from the PHA, it must be requested at the annual anniversary of the HAP contract (see Section 17-V.D.). The request must be in writing and in the form and manner required by the PHA. The PHA may only make rent increases in accordance with the rent limits described previously. There are no provisions in the PBV program for special adjustments (e.g., adjustments that reflect increases in the actual and necessary expenses of owning and maintaining the units which have resulted from substantial general increases in real property taxes, utility rates, or similar costs).

PHA Policy

An owner's request for a rent increase must be submitted to the PHA 60 days prior to the anniversary date of the HAP contract and must include the new rent amount the owner is proposing.

The PHA may not approve, and the owner may not receive any increase of rent to owner until and unless the owner has complied with requirements of the HAP contract, including compliance with **NSPIRE HQS**. The owner may not receive any retroactive increase of rent for any period of noncompliance.

Rent Decrease

If there is a decrease in the rent to owner, as established in accordance with program requirements such as a change in the FMR or exception payment standard, or reasonable rent amount, the rent to owner must be decreased regardless of whether the owner requested a rent adjustment, except where the PHA has elected within the HAP contract to not reduce rents below the initial rent under the initial HAP contract.

Notice of Rent Change

The rent to owner is redetermined by written notice by the PHA to the owner specifying the amount of the redetermined rent. The PHA notice of rent adjustment constitutes an amendment of the rent to owner specified in the HAP contract. The adjusted amount of rent to owner applies for the period of 12 calendar months from the annual anniversary of the HAP contract.

PHA Policy

The PHA will provide the owner with at least 30 days written notice of any change in the amount of rent to owner.

PHA-Owned Units [24 CFR 983.301(g)]

For PHA-owned PBV units, the initial rent to owner and the annual redetermination of rent at the anniversary of the HAP contract are determined by the independent entity approved by HUD. The PHA must use the rent to owner established by the independent entity.

17-VIII.C. REASONABLE RENT [24 CFR 983.303]

At the time the initial rent is established and all times during the term of the HAP contract, the rent to owner for a contract unit may not exceed the reasonable rent for the unit as determined by the PHA, except where the PHA has elected within the HAP contract to not reduce rents below the initial rent under the initial HAP contract.

When Rent Reasonable Determinations Are Required

The PHA must redetermine the reasonable rent for a unit receiving PBV assistance whenever any of the following occur:

- There is a 10 percent or greater decrease in the published FMR in effect 60 days before the contract anniversary (for the unit sizes specified in the HAP contract) as compared with the FMR that was in effect one year before the contract anniversary date;
- The PHA approves a change in the allocation of responsibility for utilities between the owner and the tenant;
- The HAP contract is amended to substitute a different contract unit in the same building or project; or
- There is any other change that may substantially affect the reasonable rent.

How to Determine Reasonable Rent

The reasonable rent of a unit receiving PBV assistance must be determined by comparison to rent for other comparable unassisted units. When making this determination, the PHA must consider factors that affect market rent. Such factors include the location, quality, size, type and age of the unit, as well as the amenities, housing services maintenance, and utilities to be provided by the owner.

Comparability Analysis

For each unit, the comparability analysis must use at least three comparable units in the private unassisted market. This may include units in the premises or project that is receiving project-based assistance. The analysis must show how the reasonable rent was determined, including major differences between the contract units and comparable unassisted units, and must be retained by the PHA. The comparability analysis may be performed by PHA staff or by another qualified person or entity. Those who conduct these analyses or are involved in determining the housing assistance payment based on the analyses may not have any direct or indirect interest in the property.

PHA-Owned Units

For PHA-owned units, the amount of the reasonable rent must be determined by an independent agency approved by HUD in accordance with PBV program requirements. The independent entity must provide a copy of the determination of reasonable rent for PHA-owned units to the PHA and to the HUD field office where the project is located.

Owner Certification of Reasonable Rent

By accepting each monthly housing assistance payment, the owner certifies that the rent to owner is not more than rent charged by the owner for other comparable unassisted units in the premises. At any time, the PHA may require the owner to submit information on rents charged by the owner for other units in the premises or elsewhere.

17-VIII.D. EFFECT OF OTHER SUBSIDY AND RENT CONTROL

In addition to the rent limits discussed in Section 17-VIII.B above, other restrictions may limit the amount of rent to owner in a PBV unit. In addition, certain types of subsidized housing are not even eligible to receive PBV assistance (see Section 17-II.D).

Other Subsidy [24 CFR 983.304]

To comply with HUD subsidy layering requirements, at the discretion of HUD or its designee, a PHA shall reduce the rent to owner because of other governmental subsidies, including tax credits or tax exemptions, grants, or other subsidized funding.

For units receiving assistance under the HOME program, rents may not exceed rent limits as required by that program.

For units in any of the following types of federally subsidized projects, the rent to owner may not exceed the subsidized rent (basic rent) or tax credit rent as determined in accordance with requirements for the applicable federal program:

- An insured or non-insured Section 236 project;
- A formerly insured or non-insured Section 236 project that continues to receive Interest Reduction Payment following a decoupling action;
- A Section 221(d)(3) below market interest rate (BMIR) project;
- A Section 515 project of the Rural Housing Service;
- Any other type of federally subsidized project specified by HUD.

Combining Subsidy

Rent to owner may not exceed any limitation required to comply with HUD subsidy layering requirements.

Rent Control [24 CFR 983.305]

In addition to the rent limits set by PBV program regulations, the amount of rent to owner may also be subject to rent control or other limits under local, state, or federal law.

PART IX: PAYMENTS TO OWNER

17-IX.A. HOUSING ASSISTANCE PAYMENTS [24 CFR 983.351]

During the term of the HAP contract, the PHA must make housing assistance payments to the owner in accordance with the terms of the HAP contract. During the term of the HAP contract, payments must be made for each month that a contract unit complies with HQS and is leased to and occupied by an eligible family. The housing assistance payment must be paid to the owner on or about the first day of the month for which payment is due, unless the owner and the PHA agree on a later date.

Except for discretionary vacancy payments, the PHA may not make any housing assistance payment to the owner for any month after the month when the family moves out of the unit (even if household goods or property are left in the unit).

The amount of the housing assistance payment by the PHA is the rent to owner minus the tenant rent (total tenant payment minus the utility allowance).

In order to receive housing assistance payments, the owner must comply with all provisions of the HAP contract. Unless the owner complies with all provisions of the HAP contract, the owner does not have a right to receive housing assistance payments.

17-IX.B. VACANCY PAYMENTS [24 CFR 983.352]

If an assisted family moves out of the unit, the owner may keep the housing assistance payment for the calendar month when the family moves out. However, the owner may not keep the payment if the PHA determines that the vacancy is the owner's fault.

PHA Policy

If the PHA determines that the owner is responsible for a vacancy and, as a result, is not entitled to keep the housing assistance payment, the PHA will notify the landlord of the amount of housing assistance payment that the owner must repay. The PHA will require the owner to repay the amount owed in accordance with the policies in Section 16-IV.B.

At the discretion of the PHA, the HAP contract may provide for vacancy payments to the owner. The PHA may only make vacancy payments if:

- The owner gives the PHA prompt, written notice certifying that the family has vacated the unit and identifies the date when the family moved out (to the best of the owner's knowledge);
- The owner certifies that the vacancy is not the fault of the owner and that the unit was vacant during the period for which payment is claimed;
- The owner certifies that it has taken every reasonable action to minimize the likelihood and length of vacancy; and
- The owner provides any additional information required and requested by the PHA to verify that the owner is entitled to the vacancy payment.

The owner must submit a request for vacancy payments in the form and manner required by the PHA and must provide any information or substantiation required by the PHA to determine the amount of any vacancy payment.

PHA Policy

If an owner's HAP contract calls for vacancy payments to be made, and the owner wishes to receive vacancy payments, the owner must have properly notified the PHA of the vacancy in accordance with the policy in Section 17-VI.F. regarding filling vacancies.

In order for a vacancy payment request to be considered, it must be made within 10 business days of the end of the period for which the owner is requesting the vacancy payment. The request must include the required owner certifications and the PHA may require the owner to provide documentation to support the request. If the owner does not provide the information requested by the PHA within 10 business days of the PHA's request, no vacancy payments will be made.

17-IX.C. TENANT RENT TO OWNER [24 CFR 983.353]

The tenant rent is the portion of the rent to owner paid by the family. The amount of tenant rent is determined by the PHA in accordance with HUD requirements. Any changes in the amount of tenant rent will be effective on the date stated in the PHA notice to the family and owner.

The family is responsible for paying the tenant rent (total tenant payment minus the utility allowance). The amount of the tenant rent determined by the PHA is the maximum amount the owner may charge the family for rental of a contract unit. The tenant rent covers all housing services, maintenance, equipment, and utilities to be provided by the owner. The owner may not demand or accept any rent payment from the tenant in excess of the tenant rent as determined by the PHA. The owner must immediately return any excess payment to the tenant.

Tenant and PHA Responsibilities

The family is not responsible for the portion of rent to owner that is covered by the housing assistance payment and the owner may not terminate the tenancy of an assisted family for nonpayment by the PHA.

Likewise, the PHA is responsible only for making the housing assistance payment to the owner in accordance with the HAP contract. The PHA is not responsible for paying tenant rent, or any other claim by the owner, including damage to the unit. The PHA may not use housing assistance payments or other program funds (including administrative fee reserves) to pay any part of the tenant rent or other claim by the owner.

Utility Reimbursements

If the amount of the utility allowance exceeds the total tenant payment, the PHA must pay the amount of such excess to the tenant as a reimbursement for tenant-paid utilities, and the tenant rent to the owner must be zero.

The PHA may pay the utility reimbursement directly to the family or to the utility supplier on behalf of the family. If the PHA chooses to pay the utility supplier directly, the PHA must notify the family of the amount paid to the utility supplier.

PHA Policy

The PHA will make utility reimbursements to the family.

17-IX.D. OTHER FEES AND CHARGES [24 CFR 983.354]

Meals and Supportive Services

With the exception of PBV assistance in assisted living developments, the owner may not require the tenant to pay charges for meals or supportive services. Non-payment of such charges is not grounds for termination of tenancy.

In assisted living developments receiving PBV assistance, the owner may charge for meals or supportive services. These charges may not be included in the rent to owner, nor may the value of meals and supportive services be included in the calculation of the reasonable rent. However, non-payment of such charges is grounds for termination of the lease by the owner in an assisted living development.

Other Charges by Owner

The owner may not charge extra amounts for items customarily included in rent in the locality or provided at no additional cost to unsubsidized tenants in the premises.

EXHIBIT 17-1: PBV DEVELOPMENT INFORMATION

(Fill out one for each development)

Date: [Enter the date on which this form was completed]

DEVELOPMENT INFORMATION

Development Name: [Insert name of PBV development]

Address: [Insert full address of PBV development]

Owner Information: [Insert PBV development owner name and contact information. If development is PHA-owned, enter “PHA-owned.”]

Property Management Company: [Insert property management company name and contact information, or enter “None”]

PHA-Owned: [Enter “Yes” or “No.” If yes, enter name of independent entity]

Mixed Finance Development: [Enter “Yes” or “No.” If yes, list other types of funding and units to which other funding applies.]

HAP CONTRACT

Effective Date of Contract: [Enter start date of HAP contract]

HOTMA Requirements: [If HAP contract was signed prior to April 18, 2017, enter “Pre-HOTMA.” If HAP contract was signed on or after April 18, 2017, enter “Post-HOTMA.”]

Term of HAP Contract: [Enter term from HAP contract]

Expiration Date of Contract: [Enter expiration date from HAP contract]

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	Total
# of Units							
Initial Contract Rent	\$	\$	\$	\$	\$	\$	

Structure Type: [Identify the structure type, i.e. Single Family Detached, Duplex or Two Family, Row House or Town House, Low Rise (3,4 Stories, including Garden Apartment), Highrise (5 or more stories).

Housing Type: [Identify if the units are an Independent Group Residence or Single Room Occupancy]

UTILITY RESPONSIBILITY

(Enter in Accordance with the HAP Exhibit C)

Utility	Fuel Type (Gas, Electric, Oil, Coal, Other)	Paid By (Tenant/Owner)	Provided By (Tenant/Owner)
Heating	Electric	Tenant	Owner
Cooking	Electric	Tenant	Owner
Water Heating	Electric	Tenant	Owner
Other Electric		Tenant	Owner
Water		Owner	Owner
Sewer		Owner	Owner
Trash Collection		Owner	Owner
Air Conditioning		Tenant	Owner
Refrigerator			Owner
Range/Microwave			
Other (specify)			

Accessible Units and Features: [Identify which units are accessible and describe accessibility features or enter “None”]

Target Population: [Describe targeted population in accordance with HAP contract or enter “None”]

Excepted Units: [Identify excepted unit types below or enter “None”]

Supportive Services: [Enter “Yes, see Exhibit D of HAP Contract” or enter “No”]

Elderly Units: [Enter “Yes” or “No.” If yes, identify which units are elderly units.]

Disabled Units (only for HAP contracts executed prior to April 18, 2017) [Enter “Yes” or “No.” If yes, identify which units are for persons with disabilities.]

FUPY/FYI Units: [Enter “Yes” or “No”. If yes, identify which units are FUP units.]

Are units excepted because they are located in a low-poverty census tract area?: [Enter “Yes” or “No”]

WAITING LIST AND SELECTION

Waiting List Type: [Enter “Site-based waiting list,” “Combined with HCV,” “Waiting list for entire PBV program,” or “Merged with another assisted housing program”]

Preferences: [Enter “Same as HCV; see Chapter 4” or describe preferences offered. If different from HCV, also note in Section 17.1.B of this policy.]

Preference Verification: [Enter “Same as HCV; see Chapter 4” or describe for each preference listed above. If different from HCV, note in Section 17.1.B of this policy.]

For the PBV program, is the income limit the same as the HCV program? (Note: In mixed finance developments, other income limits may also apply.) [Enter “Same as HCV; see Chapter 3” or clearly describe. If different from HCV, note in Section 17.1.B of this policy.]

OCCUPANCY

Subsidy Standards: [Enter “Same as HCV; see Chapter 5” or describe. If different from HCV, note in Section 17.1.B of this policy]

Utilities: [~~Enter in accordance with HAP contract Exhibit C~~]

Vacancy Payments: [Enter in accordance with HAP contract Part 1, e, 2 and Section 17-V.F. within this chapter]

EXHIBIT 17-2: Special Provisions Applying to TPVs Awarded as Part of a Voluntary Conversion of Public Housing Units in Projects that Include RAD PBV Units

[24 CFR Part 972.200; Notice PIH 2019-05; Notice PIH 2019-23]

Under certain circumstances, HUD allows small PHAs to reposition a public housing project (or portion of a project) by voluntarily converting units to tenant-based housing choice voucher assistance. In order to preserve affordable housing for residents of the project, the PHA is given priority to receive replacement tenant protection vouchers (TPVs). As part of the voluntary conversion, the PHA has the option to continue to operate it as rental housing. If so, the PHA or subsequent owner must allow existing families to remain in their units using the TPV in the form of tenant-based assistance. In this situation, however, the PHA may choose to project-base these TPVs in the former public housing project. Families must still be provided with the option to remain in their unit using tenant-based assistance. In order for the PHA to project-base the assistance and include these units on the PBV HAP contract, the family must voluntarily consent in writing to PBV assistance following the requirements in Appendix A of Notice PIH 2019-05. If the family fails to consent to PBV assistance and chooses to remain using tenant-based assistance, the family's unit is excluded from the PBV HAP contract until the family moves out or consents to switching to PBV assistance. In general, all applicable program regulations and guidance for the standard PBV program apply to these units.

The PHA may also convert units in the same former public housing project to the PBV program under the rental assistance demonstration (RAD) program. The RAD statute authorizes HUD to waive certain statutory and regulatory provisions governing the standard PBV program and specify alternative requirements. In order to facilitate the uniform treatment of residents and units at the project, Notice PIH 2019-23 extended some of the alternative requirements to non-RAD PBV units in the converted project (i.e., the TPV units in the project). As such, while PBV TPV units in the converted project generally follow the requirements for the standard PBV program listed in this chapter, where HUD has specified alternative requirements for non-RAD PBV units in the project, PBV TPV units will instead follow the requirements outlined in Chapter 18 of this policy for the RAD PBV program.

RAD Requirements Applicable to Non-RAD units in the Project

Alternative Requirement under RAD as Listed in Notice PIH 2019-23	Standard PBV Policy That Does Not Apply	Applicable Policy in Chapter 18
1.6.A.4. Site Selection – Compliance with PBV Goals	17-II.G. SITE SELECTION STANDARDS applies with the exception of deconcentration of poverty and expanding housing and economic opportunity requirements.	18-II.F. SITE SELECTION STANDARDS

1.6.B.5.d. PBV Site-Specific Utility Allowances	Alternative requirement under RAD. No corresponding policy in Chapter 17.	18-VII.C. UTILITY ALLOWANCES
1.6.C.1. No Rescreening of Tenants upon Conversion	Policies contained in Chapter 3 relating to eligibility do not apply to existing tenants who receive TPVs.	18-V.B. PROHIBITED RESCREENING OF EXISTING TENANTS UPON CONVERSION
1.6.C.2. Right to Return	Alternative requirement under RAD. No corresponding policy in Chapter 17.	18-I.D. RELOCATION REQUIREMENTS
1.6.C.3. Phase-in of Tenant Rent Increases	Alternative requirements under RAD. No corresponding policy in Chapter 17.	18-VIII.D. PHASE-IN OF TENANT RENT INCREASES
1.6.C.4. Family Self Sufficiency (FSS) and Resident Opportunities and Self-Sufficiency Service Coordinator (ROSS-SC) Programs	Not covered in administrative plan.	18-VI.C. PUBLIC HOUSING FSS AND ROSS PARTICIPANTS
1.6.C.5. Resident Participation and Funding	Alternative requirement under RAD. No corresponding policy in Chapter 17.	18-VI.D. RESIDENT PARTICIPATION AND FUNDING
1.6.C.6. Resident Procedural Rights	Policies related to hearings in Chapter 16 apply, with added procedural rights and notice requirements as outlined in Chapter 18.	18-VI.H. RESIDENTS' PROCEDURAL RIGHTS
1.6.C.7. Earned Income Disregard (EID)	Alternative requirements under RAD for in-place residents. New admissions follow policies in Chapter 6.	18-VI.G. EARNED INCOME DISALLOWANCE
1.6.C.8. Jobs Plus	Not covered in administrative plan.	No corresponding policy.
1.6.C.9. When Total Tenant	Alternative requirements	18-VI.B. LEASE, Continuation

Payment Exceeds Gross Rent	under RAD for in-place residents. New admissions follow policies in 17-VII.B. LEASE, Continuation of Housing Assistance Payments.	of Housing Assistance Payments
1.6.C.10. Under-Occupied Unit	Alternative requirements under RAD for in-place residents. New admissions follow 17-VII.C. MOVES, Overcrowded, Under-Occupied, and Accessible Units	18-VI.E. MOVES, Overcrowded, Under-Occupied, and Accessible Units
1.6.D.4. Establishment of Waiting List	Alternative requirements under RAD for initial establishment of the waiting list. Once waiting list is established, follow 17-VI.D. SELECTION FROM THE WAITING LIST	18-V.D. ORGANIZATION OF THE WAITING LIST
1.6.D.10. Initial Certifications and Tenant Rent Calculations	Alternative requirements under RAD for in-place residents. No corresponding policy in Chapter 17.	18-VIII.C. TENANT RENT TO OWNER, Initial Certifications

Note, while Notice PIH 2019-05 states that the PHA must screen families for eligibility for a tenant protection voucher and that families must be below the low-income limit (80 percent of AMI), Notice PIH 2019-23 waives these requirements for residents in projects that include RAD PBV units.

Chapter 18

PROJECT BASED VOUCHERS (PBV) UNDER THE RENTAL ASSISTANCE DEMONSTRATION (RAD) PROGRAM

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

This chapter describes HUD regulations and PHA policies related to the Project-Based Voucher (PBV) program under the Rental Assistance Demonstration (RAD) program in eight parts. The PHA will create new policies based on applicable regulations.

The PHA currently has no RAD Projects.

Part I: General Requirements. This part describes general provisions of the PBV program, including maximum budget authority requirements, relocation requirements, and equal opportunity requirements.

Part II: PBV Project Selection. This part describes the cap on assistance at projects receiving PBV assistance, ownership and control, and site selection standards.

Part III: Dwelling Units. This part describes requirements related to housing quality standards, the type and frequency of inspections, and housing accessibility for persons with disabilities.

Part IV: Housing Assistance Payments Contract. This part discusses HAP contract requirements and policies including the execution and term of the HAP contract.

Part V: Selection of PBV Program Participants. This part describes the requirements and policies governing how the PHA and the owner will select a family to receive PBV assistance.

Part VI: Occupancy. This part discusses occupancy requirements related to the lease and describes under what conditions families are allowed or required to move.

Part VII: Determining Contract Rent. This part describes how the initial rent to owner is determined, and how rent will be redetermined throughout the life of the HAP contract.

Part VIII: Payments to Owner. This part describes the types of payments owners may receive under this program.

PART I: GENERAL REQUIREMENTS

18-1.A. OVERVIEW AND HISTORY OF THE RAD PROGRAM

The Rental Assistance Demonstration (RAD) program was authorized in 2012 in order to assess the effectiveness of converting public housing, moderate rehabilitation properties, and units under the rent supplement and rental assistance payments programs to long-term, project-based Section 8 rental assistance. The program's four primary objectives are to:

- Preserve and improve public and other assisted housing.
- Standardize the administration of the plethora of federally subsidized housing programs and rules. The conversions are intended to promote operating efficiency by using a Section 8 project-based assistance model that has proven successful and effective for over 30 years. In other words, RAD aligns eligible properties more closely with other affordable housing programs.
- Attract private market capital for property renovations. Through the use of this model, properties may be able to leverage private debt and equity to make capital repairs.
- Increase tenant mobility opportunities.

Under the first component, a PHA with public housing units may submit an application to HUD to convert some or all of their public housing units to long-term, project-based Section 8 HAP contracts under either:

- Project-based rental assistance (PBRA) under HUD's Office of Multifamily Housing Programs.
- Project-based vouchers (PBVs) under HUD's Office of Public and Indian Housing (PIH).

This chapter will focus on public housing conversions to the PBV program under RAD. In order to distinguish between requirements for public housing conversion under RAD and PBV units under the standard PBV program, we will refer to the standard PBV program and the RAD PBV program.

EMERGENCY HOUSING VOUCHERS (EHVs)

INTRODUCTION

On March 11, 2021, President Biden signed the American Rescue Plan Act of 2021 (ARP) (P.L. 117-2). Section 3202 of the ARP appropriated \$5 billion for the creation, administration, and renewal of new incremental emergency housing vouchers (EHVs) and other eligible expenses related to COVID-19.

On May 5, 2021, HUD issued Notice PIH 2021-15, which described HUD's process for allocating approximately 70,000 EHVs to eligible PHAs and set forth the operating requirements for PHAs who administer them. Based on criteria outlined in the notice, HUD notified eligible PHAs of the number of EHVs allocated to their agency, and PHAs were able to accept or decline the invitation to participate in the program.

PHAs may not project-base EHVs; EHVs are exclusively tenant-based assistance.

All applicable nondiscrimination and equal opportunity requirements apply to the EHV program, including requirements that OHA will grant reasonable accommodations to persons with disabilities, effectively communicate with persons with disabilities, and ensure meaningful access for persons with limited English proficiency (LEP).

This chapter describes HUD regulations and PHA policies for administering EHVs. The policies outlined in this chapter are organized into seven sections, as follows:

Part I: Funding

Part II: Partnering Agencies

Part III: Waiting List Management

Part IV: Family Eligibility

Part V: Housing Search and Leasing

Part VI: Use of Funds, Reporting, and Financial Records

Except as addressed by this chapter and as required under federal statute and HUD requirements, the general requirements of the HCV program apply to EHVs.

PART I: FUNDING

TPS-I.A. FUNDING OVERVIEW

The American Rescue Plan Act of 2021 (ARP) provides administrative fees and funding for the costs of administering emergency housing vouchers (EHVs) and other eligible expenses defined in Notice PIH 2021-15. These fees may only be used for EHV administration and other eligible expenses and must not be used for or applied to other PHA programs or vouchers. OHA must maintain separate financial records from its regular HCV funding for all EHV funding.

Housing Assistance Payments (HAP) Funding

ARP funding obligated to OHA as housing assistance payments (HAP) funding may only be used for eligible EHV HAP expenses (i.e., rental assistance payments). EHV HAP funding may not be used for EHV administrative expenses or for the eligible uses under the EHV services fee.

The initial funding term will expire December 31, 2022. HUD will provide renewal funding to OHA for the EHVs on a calendar year (CY) basis commencing with CY 2023. The renewal funding allocation will be based on the PHA's actual EHV HAP costs in leasing, similar to the renewal process for the regular HCV program. EHV renewal funding is not part of the annual HCV renewal funding formula; EHVs are renewed separately from the regular HCV program. All renewal funding for the duration of the EHV program has been appropriated as part of the ARP funding.

Administrative Fee and Funding

The following four types of fees and funding are allocated as part of the EHV program:

- **Preliminary fees** support immediate start-up costs that OHA will incur in implementing alternative requirements under EHV, such as outreach and coordination with partnering agencies:
 - \$400 per EHV allocated to the PHA, once the consolidated annual contributions contract (CACC) is amended.
 - This fee may be used for any eligible administrative expenses related to EHVs.
 - The fee may also be used to pay for any eligible activities under EHV service fees (TPS-I.B).

- **Placement fees/expedited issuance reporting fees** will support initial lease-up costs and the added cost and effort required to expedite leasing of EHV's:
 - \$100 for each EHV initially leased, if OHA reports the voucher issuance date in Public Housing Information Center–Next Generation (PIC–NG) system within 14 days of voucher issuance or the date the system becomes available for reporting.
 - Placement fees:
 - o \$500 for each EHV family placed under a HAP contract effective within four months of the effective date of the ACC funding increment; or
 - o \$250 for each EHV family placed under a HAP contract effective after four months but less than six months after the effective date of the ACC funding increment.
 - o HUD will determine placement fees in the event of multiple EHV allocations and funding increment effective dates.
 - Placement/expedited issuance fees only apply to the initial leasing of the voucher; they are not paid for family moves or to turnover vouchers.
- **Ongoing administrative fees**, which are calculated in the same way as the standard HCV program:
 - PHAs are allocated administrative fees using the full column A administrative fee amount for each EHV under contract as of the first day of each month.
 - Ongoing EHV administrative fees may be subject to proration in future years, based on available EHV funding.
- **Services fees**, which are a one-time fee to support PHAs' efforts to implement and operate an effective EHV services program in its jurisdiction (TPS-I.B):
 - The fee is allocated once the PHA's CACC is amended to reflect EHV funding.
 - The amount allocated is \$3,500 for each EHV allocated.

TPS-I.B. SERVICE FEES

Services fee funding must be initially used for defined eligible uses and not for other administrative expenses of operating the EHV program. Service fees fall into four categories:

- Housing search assistance
- Security deposit/utility deposit/rental application/holding fee uses
- Owner-related uses
- Other eligible uses such as moving expenses or tenant-readiness services

OHA must establish the eligible uses and the parameters and requirements for service fees in the PHA's administrative plan.

OHA Policy

The eligible uses for service fees include:

Housing search assistance, which may include activities such as, but not limited to, helping a family identify and visit potentially available units during their housing search, helping to find a unit that meets the household's disability-related needs, providing transportation and directions, assisting with the completion of rental applications and PHA forms, and helping to expedite the EHV leasing process for the family.

Application fees/non-refundable administrative or processing fees/refundable application deposit assistance. OHA will assist the family with some or all these expenses.

Holding fees are fees an owner request that are rolled into the security deposit after an application is accepted but before a lease is signed. OHA will cover part or all the holding fee for units where the fee is required by the owner after a tenant's application has been accepted but before the lease signing. OHA and owner must agree how the holding fee gets rolled into the deposit, and under what conditions the fee will be returned. In general, owners need to accept responsibility for making needed repairs to a unit required by the initial housing quality standards (HQS) inspections and can only keep the holding fee if the client is at fault for not entering into a lease.

Security deposit assistance. The amount of the security deposit assistance may not exceed the lesser of two months' rent to owner, the maximum-security deposit allowed under applicable state and/or local law, or the actual security deposit required by the owner. OHA will pay the security deposit assistance directly to the owner. If paid to the family, OHA will require documentation that the family paid the security deposit.

Utility deposit assistance/utility arrears. OHA will provide utility deposit assistance for some or all the family's utility deposit expenses. Assistance can be provided for deposits (including connection fees) required for the utilities to be supplied by the tenant under the lease. OHA will pay the utility deposit assistance directly to the utility company or may pay the assistance to the family. If paid to the family, OHA will require documentation the family paid the utility deposit. OHA will require the utility supplier or family to return the utility deposit assistance to OHA at such time the deposit is returned by the utility supplier (less any amounts retained by the utility supplier). In addition, some families may have large balances with gas, electric, water, sewer, or trash companies that will make it difficult if not impossible to establish services for tenant-supplied utilities. OHA will also provide the family with assistance to help address these utility arrears to facilitate leasing. Utility deposit assistance returned to OHA will be used for either services fee eligible uses or other EHV administrative costs, as required by HUD.

Owner recruitment and outreach for EHV's. OHA will use the service fee funding to conduct owner recruitment and outreach specifically for EHV's. In addition to traditional owner recruitment and outreach, activities may include conducting pre-inspections or otherwise expediting the inspection process, providing enhanced customer service, and offering owner incentive and/or retention payments.

Owner incentive and/or retention payments. OHA will make incentive or retention payments to owners that agree to initially lease their unit to an EHV family and/or renew the lease of an EHV family.

Payments will be made as a single payment at the beginning of the assisted lease term (or lease renewal if a retention payment). Owner incentive and retentions payments are not housing assistance payments, are not part of the rent to owner, and are not taken into consideration when determining whether the rent for the unit is reasonable.

Moving expenses (including move-in fees and deposits). OHA will provide assistance for some or all of the family's reasonable moving expenses when they initially lease a unit with the EHV. OHA will not provide moving expenses assistance for subsequent moves unless the family is required to move for reasons other than something the family did or failed to do (e.g., OHA is terminating the HAP contract because the owner did not fulfill the owner responsibilities under the HAP contract or the owner is refusing to offer the family the opportunity to enter a new lease after the initial lease term, as opposed to the family choosing to terminate the tenancy in order to move to another unit), or a family has to move due to domestic violence, dating violence, sexual assault, or stalking.

Tenant-readiness services. OHA will use fees to help create a customized plan to address or mitigate barriers that individual families may face in renting a unit with an EHV, such as negative credit, lack of credit, negative rental or utility history, or to connect the family to other community resources (including COVID-related resources) that can assist with rental arrears.

Essential household items. OHA may use services fee funding to assist the family with some or all of the costs of acquiring essential household items such as tableware, cooking equipment, beds or bedding, and essential sanitary products such as soap and toiletries.

Renter's insurance if required by the lease. OHA may choose to assist the family with some or all this cost.

Any services fee assistance that is returned to OHA after its initial or subsequent use may only be applied to the eligible services fee uses defined in Notice PIH 2021-15 (or subsequent notice) or other EHV administrative costs. Any amounts not expended for these eligible uses when the PHA's EHV program ends must be remitted to HUD.

PART II: PARTNERING AGENCIES

TPS-II.A. CONTINUUM OF CARE (CoC)

PHAs that accept an allocation of EHV's are required to enter into a Memorandum of Understanding (MOU) with the Continuum of Care (CoC) to establish a partnership for the administration of EHV's.

OHA Policy

OHA has entered into an MOU with the Continuum of Care (CoC)/Metro Area Continuum of Care for the Homeless (MAACH Agency). See Exhibit TPS-1 for a copy of the MOU.

TPS-II.B. OTHER PARTNERING ORGANIZATIONS

OHA may, but is not required to, partner with other organizations trusted by persons experiencing homelessness, such as victim services providers (VSPs) and other community partners. If OHA chooses to partner with such agencies, OHA must either enter into an MOU with the partnering agency or the partnering agency may be added to the MOU between OHA and CoC.

OHA Policy

OHA has not added any other agencies to the MOU between OHA and Metro Area Continuum of Care for the Homeless (MAACH Agency). See Exhibit TPS-1 for a copy of the MOU.

TPS-II.C. REFERRALS

CoC and Partnering Agency Referrals

The primary responsibility of the CoC under the MOU with OHA is to make direct referrals of qualifying individuals and families to OHA. OHA must generally refer a family that is seeking EHV assistance directly from OHA to the CoC or other referring agency for initial intake, assessment, and possible referral for EHV assistance. Partner CoCs are responsible for determining whether the family qualifies under one of the four eligibility categories for EHV's. The CoC or other direct referral partner must provide supporting documentation to OHA of the referring agency's verification that the family meets one of the four eligible categories for EHV assistance.

OHA Policy

The CoC or partnering agency must establish and implement a system to identify EHV-eligible individuals and families within the agency's caseload and make referrals to OHA. The CoC or other partnering agency must certify that the EHV applicants they refer to OHA meet at least one of the four EHV eligibility criteria. OHA will maintain a copy of the referral or certification from the CoC or other partnering agency in the participant's file along with other eligibility paperwork. Homeless service providers may, but are not required to, use the certification form found in Exhibit TPS-2 of this chapter. Victim services providers may, but are not required to, use the certification form found in Exhibit TPS-3 of this chapter when identifying eligible families who qualify as victims of human trafficking.

As part of the MOU, OHA and CoC or other partnering agency will identify staff positions to serve as lead EHV liaisons. These positions will be responsible for transmission and acceptance of referrals. The CoC or partnering agency must commit sufficient staff and resources to ensure eligible individuals and families are identified and determined eligible in a timely manner.

OHA'S liaison is responsible for acceptance of referrals will contact the CoC or partnering agency liaison via email indicating the number of vouchers available and requesting an appropriate number of referrals. No more than five business days from the date the CoC or partnering agency receives this notification, the CoC or partnering agency liaison will provide OHA with a list of eligible referrals including the name, address, and contact phone number for each adult individual who is being referred; a completed release form for each adult family member; and a written certification for each referral indicating they are EHV-eligible.

Offers of Assistance with CoC Referral

OHA will make an EHV available without a referral from the CoC or other partnering organization in order to facilitate an emergency transfer under VAWA in accordance with the PHA's Emergency Transfer Plan (ETP) in Chapter 16.

OHA must also take direct referrals from outside the CoC if:

- The CoC does not have a sufficient number of eligible families to refer to the PHA; or
- The CoC does not identify families that may be eligible for EHV assistance because they are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking.

If at any time OHA is not receiving enough referrals or is not receiving referrals in a timely manner from the CoC or other partner referral agencies (or if OHA and CoC cannot identify any such alternative referral partner agencies), HUD may permit OHA on a temporary or permanent basis to take EHV applications directly from applicants and admit eligible families to the EHV program in lieu of or in addition to direct referrals in those circumstances.

PART III: WAITING LIST MANAGEMENT

TPS-III. A. HCV WAITING LIST

The regulation that requires OHA to admit applicants as waiting list admissions or special admissions in accordance with admission policies in Chapter 4 does not apply to PHAs operating the EHV program. Direct referrals are not added to the PHA's HCV waiting list.

OHA must inform families on the HCV waiting list of the availability of EHV's by, at a minimum, either by posting the information to their website or providing public notice in their respective communities in accordance with the requirements listed in Notice PIH 2021-15.

OHA Policy

OHA will post information about the EHV program for families on the PHA's HCV waiting list on their website. The notice will:

- Describe the eligible populations to which EHV's are limited

- Clearly state that the availability of these EHV's is managed through a direct referral process

- Advise the family to contact the CoC (or any other PHA referral partner, if applicable) if the family believes they may be eligible for EHV assistance

OHA will ensure effective communication with persons with disabilities, including those with vision, hearing, and other communication-related disabilities in accordance with Chapter 2. OHA will also take reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP) in accordance with Chapter 2.

TPS-III.B. EHV WAITING LIST

The HCV regulations requiring OHA to operate a single waiting list for admission to the HCV program do not apply to PHAs operating the EHV program. Instead, when the number of applicants referred by the CoC or partnering agency exceeds the EHV's available, OHA must maintain a separate waiting list for EHV referrals, both at initial leasing and for any turnover vouchers that may be issued prior to September 30, 2023.

Further, the EHV waiting list is not subject to PHA policies in Chapter 4 regarding opening and closing the HCV waiting list. OHA will work directly with its CoC and other referral agency partners to manage the number of referrals and the size of the EHV waiting list.

TPS-III.C. PREFERENCES

HCV Waiting List Preferences

If local preferences are established by OHA for HCV, they do not apply to EHV. However, if OHA has a homeless preference or a VAWA preference for the HCV waiting list, OHA must adopt additional policies related to EHV in accordance with Notice PIH 2021-15.

OHA Policy

OHA regular HCV preferences include homeless preference the homeless preference will apply to any new EHV waiting list.

EHV Waiting List Preferences

With the exception of a residency preference, OHA may choose, in coordination with the CoC and other referral partners, to establish separate local preferences for EHV. OHA may, however, choose to not establish any local preferences for the EHV waiting list.

OHA Policy

EHV Preference

Emergency Housing Voucher participants- who Meet Specific Criteria: Families that were over leased criteria: Families that are currently leased under the EHV program that OHA has determined are leased over the original allocation. This preference is limited to exact number of households overleased.	Absolute

This preference is developed in accordance with requirements for the Emergency Housing Voucher Program and is limited to Emergency Housing Vouchers.

The PHA will grant a Housing Choice Voucher (HCV) for the over issuance of Emergency Housing to the number of participants overissued. The PHA will allow for a transfer from the EHV program to the HCV program for the exact number of participants overissued to be effective the first day of the month following the month in which we discovered the overissuance.

PART IV: FAMILY ELIGIBILITY

TPS-IV.A. OVERVIEW

The CoC or referring agency determines whether the individual or family meets any one of the four eligibility criteria described in Notice PIH 2021-15 and then refers the family to the PHA. OHA determines that the family meets other eligibility criteria for the HCV program, as modified for the EHV program and outlined below.

TPS-IV.B. REFERRING AGENCY DETERMINATION OF ELIGIBILITY

In order to be eligible for an EHV, an individual or family must meet one of four eligibility criteria:

- Homeless as defined in 24 CFR 578.3;
- At risk of homelessness as defined in 24 CFR 578.3;
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking (as defined in Notice PIH 2021-15), or human trafficking (as defined in the 22 U.S.C. Section 7102); or
- Recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability as determined by the CoC or its designee in accordance with the definition in Notice PIH 2021-15.

As applicable, the CoC or referring agency must provide documentation to OHA of the referring agency's verification that the family meets one of the four eligible categories for EHV assistance. OHA must retain this documentation as part of the family's file.

TPS-IV.C. PHA SCREENING

Overview

HUD waived 24 CFR 982.552 and 982.553 in part for the EHV applicants and established alternative requirement for mandatory and permissive prohibitions of admissions. Except where applicable, PHA policies regarding denials in Chapter 3 of this policy do not apply to screening individuals and families for eligibility for an EHV. Instead, the EHV alternative requirement listed in this section will apply to all EHV applicants.

The mandatory and permissive prohibitions listed in Notice PIH 2021-15 and in this chapter, however, apply only when screening the individual or family for eligibility for an EHV. When adding a family member after the family has been placed under a HAP contract with EHV assistance, the regulations at 24 CFR 982.551(h)(2) apply. Other than the birth, adoption, or court-awarded custody of a child, OHA must approve additional family members and may apply its regular HCV screening criteria in Chapter 3 in doing so.

Mandatory Denials

Under alternative requirements for the EHV program, mandatory denials for EHV applicants include:

- 24 CFR 982.553(a)(1)(ii)(C), which prohibits admission if any household member has ever been convicted of drug-related criminal activity for manufacture or production of methamphetamine on the premises of federally assisted housing.
- 24 CFR 982.553(a)(2)(i), which prohibits admission to the program if any member of the household is subject to a lifetime registration requirement under a state sex offender registration program.

OHA must deny admission to the program if any member of the family fails to sign and submit consent forms for obtaining information as required by 24 CFR 982.552(b)(3) but should notify the family of the limited EHV grounds for denial of admission first.

OHA Policy

While OHA will deny admission to the program if any adult member (or head of household or spouse, regardless of age) fails to sign and submit consent forms, OHA will first notify the family of the limited EHV grounds for denial of admission as part of the notice of denial that will be mailed to the family.

Permissive Denial

Notice PIH 2021-15 lists permissive prohibitions for which OHA may, but is not required to, deny admission to EHV families. The notice also lists prohibitions that, while allowable under the HCV program, may not be used to deny assistance for EHV families.

If OHA intends to establish permissive prohibition policies for EHV applicants, OHA must first consult with its CoC partner to understand the impact that the proposed prohibitions may have on referrals and must take the CoC's recommendations into consideration.

OHA Policy

In consultation with the CoC, OHA will apply permissive prohibition to the screening of EHV applicants. Determinations using permissive prohibitions will be made based on an individualized assessment of relevant mitigating information in accordance with policies in Section 3-III.E.

OHA will establish the following permissive prohibitions:

If OHA determines that any household member is currently engaged in, or has engaged in within the previous 12 months:

Violent criminal activity

Other criminal activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity

If any member of the family has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program within the previous 12 months.

If the family engaged in or threatened abusive or violent behavior toward PHA personnel within the previous 12 months.

OHA will also deny assistance to household members already receiving assistance from another program in accordance with Section 9.h. of Notice PIH 2021-15.

Prohibitions based on criminal activity for the eligible EHV populations regarding drug possession will be considered apart from criminal activity against persons (i.e., violent criminal activity).

In compliance with PIH 2021-15, OHA **will not** deny an EHV applicant admission regardless of whether:

Any member of the family has been evicted from federally assisted housing in the last five years;

A PHA has ever terminated assistance under the program for any member of the family;

The family currently owes rent or other amounts to OHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act;

The family has not reimbursed any PHA for amounts paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease;

The family breached an agreement with OHA to pay amounts owed to a PHA, or amounts paid to an owner by a PHA;

The family would otherwise be prohibited admission under alcohol abuse standards established by OHA in accordance with 24 CFR 982.553(a)(3);

OHA determines that any household member is currently engaged in or has engaged in during a reasonable time before the admission, drug-related criminal activity.

TPS-IV.D. INCOME VERIFICATION AT ADMISSION

Self-Certification at Admission

The requirement to obtain third-party verification of income in accordance with Notice PIH 2018-18 does not apply to the EHV program applicants at admission, and alternatively, PHAs may consider self-certification the highest form of income verification at admission. As such, PHA policies related to the verification of income in Section 7-I.B. do not apply to EHV families at admission. Instead, applicants must submit an affidavit attesting to their reported income, assets, expenses, and other factors that would affect an income eligibility determination.

Additionally, applicants may provide third-party documentation that represents the applicant's income within the 60-day period prior to admission or voucher issuance but is not dated within 60 days of the PHA's request.

OHA Policy

Any documents used for verification must be the original (not photocopies) and dated within the 60-day period prior to admission. The documents must not be damaged, altered, or in any way illegible.

Printouts from webpages are considered original documents.

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

OHA will incorporate additional procedures to remind families of the obligation to provide true and complete information in accordance with Chapter 14. OHA will address any material discrepancies (i.e., unreported income or a substantial difference in reported income) that may arise later. OHA may, but is not required to, offer the family a repayment agreement in accordance with Chapter 16. If the family fails to repay the excess subsidy, OHA will terminate the family's assistance in accordance with the policies in Chapter 12.

Recently Conducted Income Determinations

PHAs may accept income calculations and verifications from third-party providers or from an examination that OHA conducted on behalf of the family for another subsidized housing program in lieu of conducting an initial examination of income as long as:

- The income was calculated in accordance with rules outlined at 24 CFR Part 5 and within the last six months; and
- The family certifies there has been no change in income or family composition in the interim.

OHA Policy

OHA will accept income calculations and verifications from third-party providers provided they meet the criteria outlined above.

The family certification must be made in a format acceptable to OHA and must be signed by all adult family members whose information or status is being verified.

At the time of the family's annual reexamination OHA must conduct the annual reexamination of income as outlined at 24 CFR 982.516 and PHA policies in Chapter 11.

EIV Income Validation

Once HUD makes the EIV data available to PHAs under this waiver and alternative requirement, OHA must:

- Review the EIV Income and Income Validation Tool (IVT) reports to confirm and validate family-reported income within 90 days of the PIC submission date;
- Print and maintain copies of the EIV Income and IVT Reports in the tenant file; and
- Resolve any income discrepancy with the family within 60 days of the EIV Income or IVT Report dates.

Prior to admission, PHAs must continue to use HUD's EIV system to search for all household members using the Existing Tenant Search in accordance with PHA policies in Chapter 3.

If a PHA later determines that an ineligible family received assistance, OHA must take steps to terminate that family from the program in accordance with Chapter 12.

TPS-IV.E. SOCIAL SECURITY NUMBER AND CITIZENSHIP STATUS VERIFICATION

For the EHV program, OHA is not required to obtain and verify SSN documentation and documentation evidencing eligible noncitizen status before admitting the family to the EHV program. Instead, PHAs may adopt policies to admit EHV applicants who are unable to provide the required SSN or citizenship documentation during the initial eligibility determination. As an alternative requirement, such individuals must provide the required documentation within 180 days of admission to be eligible for continued assistance, pending verification, unless OHA provides an extension based on evidence from the family or confirmation from the CoC or other partnering agency that the family has made a good-faith effort to obtain the documentation.

If a PHA determines that an ineligible family received assistance, OHA must take steps to terminate that family from the program.

OHA Policy

OHA will admit EHV applicants who are unable to provide the required SSN or citizenship documentation during the initial eligibility determination. These individuals must provide the required documentation in accordance with policies in Chapter 7 within 180 days of admission. OHA may provide an additional 60-day extension based on evidence from the family or confirmation from the CoC or other partnering agency that the family has made a good-faith effort to obtain the documentation.

If OHA determines that an ineligible family received assistance, OHA will take steps to terminate that family from the program in accordance with policies in Chapter 12.

TPS-IV.F. AGE AND DISABILITY VERIFICATION

PHAs may accept self-certification of date of birth and disability status if a higher level of verification is not immediately available. If self-certification is used, OHA must obtain a higher level of verification within 90 days of admission or verify the information in EIV.

If a PHA determines that an ineligible family received assistance, OHA must take steps to terminate that family from the program.

OHA Policy

OHA will accept self-certification of date of birth and disability status if a higher form of verification is not immediately available. The certification must be made in a format acceptable to OHA and must be signed by the family member whose information or status is being verified. If self-certification is accepted, within 90 days of admission, OHA will verify the information in EIV or through other third-party verification if the information is not available in EIV. OHA will note the family's file that self-certification was used as initial verification and include an EIV printout or other third-party verification confirming the applicant's date of birth and/or disability status.

If OHA determines that an ineligible family received assistance, OHA will take steps to terminate that family from the program in accordance with policies in Chapter 12.

TPS-IV.G. INCOME TARGETING

OHA must determine income eligibility for EHV families in accordance with 24 CFR 982.201 and OHA Policy in Chapter 3; however, income targeting requirements do not apply for EHV families. OHA may still choose to include the admission of extremely low-income EHV families in its income targeting numbers for the fiscal year in which these families are admitted.

OHA Policy

OHA will not include the admission of extremely low-income EHV families in its income targeting numbers for the fiscal year in which these families are admitted.

PART V: HOUSING SEARCH AND LEASING

TPS-V.A. INITIAL VOUCHER TERM

Unlike the standard HCV program, which requires an initial voucher term of at least 60 days, EHV vouchers must have an initial search term of at least 120 days. PHA policies on extensions as outlined in Section 5-II.E. will apply.

OHA Policy

All EHV's will have an initial term of 120 calendar days.

The family must submit a Request for Tenancy Approval and proposed lease within the 120-day period unless OHA grants an extension.

TPS-V.B. HOUSING SEARCH ASSISTANCE

OHA must ensure housing search assistance is made available to EHV families during their initial housing search. The housing search assistance may be provided directly by OHA or through the CoC or another partnering agency or entity.

At a minimum, housing search assistance must:

- Help individual families identify potentially available units during their housing search, including physically accessible units with features for family members with disabilities, as well as units in low-poverty neighborhoods;
- Provide transportation assistance and directions to potential units;
- Conduct owner outreach;
- Assist with the completion of rental applications and PHA forms; and
- Help expedite the EHV leasing process for the family

OHA Policy

As identified in the MOU between OHA and CoC, the following housing search assistance will be provided to each EHV family:

OHA will:

- Conduct owner outreach in accordance with policies in Chapter 13
- Provide directions to potential units as part of the EHV briefing packet
- Expedite the EHV leasing process for the family to the extent practicable and in accordance with policies in this chapter
- At least every 30 days, conduct proactive check-ins via email and telephone with families who are searching with an EHV and remind them of their voucher expiration date
- Assign a dedicated landlord liaison for EHV voucher families

The CoC will:

- Help families identify potentially available units during their housing search, including physically accessible units with features for family members with disabilities, as well as units in low-poverty neighborhoods
- Provide transportation assistance to potential units
- Assist the family with the completion of rental applications and OHA forms

TPS-V.C. HQS PRE-INSPECTIONS

To expedite the leasing process, PHAs may pre-inspect available units that EHV families may be interested in leasing in order to maintain a pool of eligible units.

OHA Policy

To expedite the leasing process, OHA may pre-inspect available units that EHV families may be interested in leasing to maintain a pool of eligible units. If an EHV family selects a unit that passed a HQS pre-inspection (without intervening occupancy) within 45 days of the date of the Request for Tenancy Approval, the unit may be approved provided that it meets all other conditions under 24 CFR 982.305.

The family will be free to select his or her unit.

When a pre-inspected unit is not selected, OHA will make every effort to fast-track the inspection process, including adjusting the normal inspection schedule for any required reinspections.

TPS-V.D. INITIAL LEASE TERM

Unlike in the standard the HCV program, EHV voucher holders may enter into an initial lease that is for less than 12 months, regardless of OHA policy in Section 9-I.E., Term of Assisted Tenancy.

TPS-V.E. PORTABILITY

The normal HCV portability procedures and requirements outlined in Chapter 10 generally apply to EHV. Exceptions are addressed below.

Nonresident Applicants

Under EHV, applicant families may move under portability even if the family did not have legal residency in the jurisdiction of the initial PHA when they applied, regardless of OHA Policy in Section 10-II.B.

Billing and Absorption

A receiving PHA cannot refuse to assist an incoming EHV family, regardless of whether OHA administers EHV under its own ACC.

- If the EHV family moves under portability to another PHA that administers EHV under its own ACC:
 - The receiving PHA may only absorb the incoming EHV family with an EHV (assuming it has an EHV voucher available to do so).
 - If OHA does not have an EHV available to absorb the family, it must bill the initial PHA. The receiving PHA must allow the family to lease the unit with EHV assistance and may not absorb the family with a regular HCV when the family leases the unit.
 - Regardless of whether the receiving PHA absorbs or bills the initial PHA for the family's EHV assistance, the EHV administration of the voucher is in accordance with the receiving PHA's EHV policies.
- If the EHV family moves under portability to another PHA that does not administer EHV under its own ACC, the receiving PHA may absorb the family into its regular HCV program or may bill the initial PHA.

Family Briefing

In addition to the applicable family briefing requirements at 24 CFR 982.301(a)(2) as to how portability works and how portability may affect the family's assistance, the initial PHA must inform the family how portability may impact the special EHV services and assistance that may be available to the family.

The initial PHA is required to help facilitate the family's portability move to the receiving PHA and inform the family of this requirement in writing, taking reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP).

OHA Policy

In addition to following OHA Policy on briefings in Chapter 5, as part of the briefing packet for EHV families, OHA will include a written notice that OHA will assist the family with moves under portability.

For limited English proficient (LEP) applicants, OHA will provide interpretation services in accordance with the PHA's LEP plan (See Chapter 2).

Coordination of Services

If the portability move is in connection with the EHV family's initial lease-up, the receiving PHA and the initial PHA must consult and coordinate on the EHV services and assistance that will be made available to the family.

OHA Policy

For EHV families who are exercising portability, when OHA contacts the receiving PHA in accordance with Section 10-II.B. Preapproval Contact with Receiving PHA, OHA will consult and coordinate with the receiving PHA to ensure there is no duplication of EHV services and assistance and ensure the receiving PHA is aware of the maximum amount of services fee funding that the initial PHA may provide to the receiving PHA on behalf of the family.

Services Fee

Standard portability billing arrangements apply for HAP and ongoing administrative fees for EHV families.

For service fees funding, the amount of the service fee provided by the initial PHA may not exceed the lesser of the actual cost of the services and assistance provided to the family by the receiving PHA or \$1,750, unless the initial PHA and receiving PHA mutually agree to change the \$1,750 cap. Service fees are paid as follows:

- If the receiving PHA, in consultation and coordination with the initial PHA, will provide eligible services or assistance to the incoming EHV family, the receiving PHA may be compensated for those costs by the initial PHA, regardless of whether the receiving PHA bills or absorbs.
- If the receiving PHA administers EHV, the receiving PHA may use its own services fee and may be reimbursed by the initial PHA, or the initial PHA may provide the services funding upfront to the receiving PHA for those fees and assistance.
- If the receiving PHA does not administer EHV, the initial PHA must provide the services funding upfront to the receiving PHA. Any amounts provided to the receiving PHA that are not used for services or assistance on behalf of the EHV family must promptly be returned by the receiving PHA to the initial PHA.

Placement Fee/Issuance Reporting Fee

If the portability lease-up qualifies for the placement fee/issuance reporting fee, the receiving PHA receives the full amount of the placement component of the placement fee/issuing reporting fee. The receiving PHA is eligible for the placement fee regardless of whether the receiving PHA bills the initial PHA or absorbs the family into its own program at initial lease-up. The initial PHA qualifies for the issuance reporting component of the placement fee/issuance reporting fee, as applicable.

TPS-V.F. PAYMENT STANDARDS

Payment Standard Schedule

For the EHV program, HUD has waived the regulation requiring a single payment standard for each unit size. Instead, OHA may, but is not required to, establish separate higher payment standards for EHV. Lower EHV payment standards are not permitted. If OHA is increasing the regular HCV payment standard, OHA must also increase the EHV payment standard if it would be otherwise lower than the new regular HCV payment standard. The separate EHV payment standard must comply with all other HCV requirements with the exception of the alternative requirements discussed below.

Further, if OHA chooses to establish higher payments standards for EHV, HUD has provided other regulatory waivers:

- Defining the “basic range” for payment standards as between 90 and 120 percent of the published Fair Market Rent (FMR) for the unit size (rather than 90 to 110 percent).
- Allowing a PHA that is not in a designated Small Area FMR (SAFMR) area or has not opted to voluntarily implement SAFMRs to establish exception payment standards for a ZIP code area above the basic range for the metropolitan FMR based on the HUD published SAFMRs. OHA may establish an exception payment standard up to 120 percent (as opposed to 110 percent) of the HUD published Small Area FMR for that ZIP code area. The exception payment standard must apply to the entire ZIP code area.
 - OHA must notify HUD if it establishes an EHV exception payment standard based on the SAFMR.

OHA Policy

OHA will not establish a higher payment standard amount for EHV. OHA will use the same payment standards for HCV and EHV.

Rent Reasonableness

All rent reasonableness requirements apply to EHV units, regardless of whether OHA has established an alternative or exception EHV payment standard.

Increases in Payment Standards

The requirement that OHA apply increased payment standards at the family’s first regular recertification on or after the effective date of the increase does not apply to EHV. OHA may, but is not required to, establish an alternative policy on when to apply the increased payment standard, provided the increased payment standard is used to calculate the HAP no later than the effective date of the family’s first regular reexamination following the change.

OHA Policy

OHA will not establish an alternative policy for increases in the payment standard. OHA Policy in Section 11-III.B. governing increases in payment standards will apply to EHV.

TPS-V.G. TERMINATION OF VOUCHERS

After September 30, 2023, a PHA may not reissue EHV's when assistance for an EHV-assisted family ends. This means that when an EHV participant (a family that is receiving rental assistance under a HAP contract) leaves the program for any reason, OHA may not reissue that EHV to another family unless it does so no later than September 30, 2023.

If an applicant family that was issued the EHV is unsuccessful in finding a unit and the EHV expires after September 30, 2023, the EHV may not be reissued to another family.

All EHV's under lease on or after October 1, 2023, may not under any circumstances be reissued to another family when the participant leaves the program for any reason.

An EHV that has never been issued to a family may be initially issued and leased after September 30, 2023, since this prohibition only applies to EHV's that are being reissued upon turnover after assistance to a family has ended. However, HUD may direct PHAs administering EHV's to cease leasing any unleased EHV's if such action is determined necessary by HUD to ensure there will be sufficient funding available to continue to cover the HAP needs of currently assisted EHV families.

PART VI: USE OF FUNDS, REPORTING, AND FINANCIAL RECORDS

EHV funds allocated to OHA for HAP (both funding for the initial allocation and HAP renewal funding) may only be used for eligible EHV HAP purposes. EHV HAP funding obligated to OHA may not be used for EHV administrative expenses or the other EHV eligible expenses under this notice. Likewise, EHV administrative fees and funding obligated to OHA are to be used for those purposes and must not be used for HAP.

The appropriated funds for EHV are separate from the regular HCV program and may not be used for the regular HCV program but may only be expended for EHV eligible purposes. EHV HAP funds may not roll into the regular HCV restricted net position (RNP) and must be tracked and accounted for separately as EHV RNP. EHV administrative fees and funding for other eligible expenses permitted by Notice PIH 2021-15 may only be used in support of the EHV and cannot be used for regular HCVs. EHV funding may not be used for the repayment of debts or any amounts owed to HUD by HUD program participants including, but not limited to, those resulting from Office of Inspector General (OIG), Quality Assurance Division (QAD), or other monitoring review findings.

OHA must comply with EHV reporting requirements in the Voucher Management System (VMS) and Financial Data Schedule (FDS) as outlined in Notice PIH 2021-15.

OHA must maintain complete and accurate accounts and other records for the program and provide HUD and the Comptroller General of the United States full and free access to all accounts and records that are pertinent the administration of the EHV in accordance with the HCV program requirements at 24 CFR 982.158.

Exhibit TPS-1: MEMORANDUM OF UNDERSTANDING (MOU)

This Memorandum of Understanding (MOU) has been created and entered into on

July 15, 2021

Omaha Housing Authority

1823 Harney Street, Omaha, Ne 68102

Metro Area Continuum of Care for the Homeless (MAACH) Agency

6001 Dodge Street, Omaha, Ne 68182

This Memorandum of Understanding (MOU) between the Housing Authority of the City of Omaha (OHA / PHA) and the Metro Area Continuum of Care for the Homeless (MACCH / CoC) has been entered into on July 15, 2021.

1) Purpose and Goals

- a) The purpose of this MOU is to establish OHA and MACCH's commitment to administering the Emergency Housing Vouchers (EHVs) in the City of Omaha in accordance with all program requirements and the service area of OHA.
- b) OHA and MACCH are committed to prioritizing racial equity in the project design and administration of EHVs, ensuring intentional decision making that furthers racial equity advancement.
- c) OHA will follow all Housing and Urban Development (HUD) regulations and OHA administrative plan policies in administering the program.
- d) Identification of staff position at the PHA and CoC who will serve as the lead EHV liaisons.
 - i) Lead HCV Liaison: DaShawna Young, Transitional housing Coordinator
 - ii) Lead CoC Liaison: Tamara Dwyer, CoC Support Specialist

2) Populations eligible and prioritized for EHV assistance (to be referred by CoC)

	Target % of EHV Vouchers (no min/max)
a. Non-chronically homeless persons in need of a rent subsidy and would be considered to have low barriers to obtaining and maintaining housing (30%), • starting with those exiting non-congregate shelter, AND	30% 21-27%
b. Households currently being assisted through rapid rehousing (RRH) or emergency solutions grant (ESG) funded programs, but will need a rent subsidy beyond the time limits imposed by RRH or ESG, AND	30%
c. Households currently residing in permanent supportive housing (PSH) that have a need for an on-going rent subsidy, but no longer have a need for on-going housing-connected service provision, AND	30%
d. Households currently residing in permanent supportive housing (PSH) that	20%

have a need for an on-going rent subsidy, but no longer have a need for on-going housing-connected service provision Providers referring for RRH/ESG or PSH move-on commit to participating in and implementing a community training process related to identification and referral of move-on households.	

By targeting PSH Move On as a priority group for EHV, the community agrees to work with the Coordinated Entry Committee Steering Committee to develop processes to ensure any PSH resources vacated by people moving on to EHV will go through a racially equitable matching and referral process that at minimum matches the percentage of Black, Brown & Indigenous people who enter the Omaha Metro area homelessness system.

3) Housing Placement Services available to eligible EHV households

- a) Individuals and families will be assisted in completing applications and obtaining necessary supporting documentation to support referrals and applications for EHV assistance, while aiding households in addressing barriers.
- b) Partnering service providers will support PHAs in ensuring appointment notifications to eligible individuals and families and will assist eligible households in getting to meetings with the PHA.
- c) OHA will establish windows of time and flexibility for EHV applicants to complete application processes and voucher briefings for EHV.
- d) Housing search assistance will be provided for eligible individuals and families.
- e) Counseling on compliance with rental lease requirements will be provided to eligible individuals and families.
- f) Eligible individuals and families will be provided with financial assistance for security deposits, utility hook-up fees, and utility deposits.
- g) Individuals and families will be referred to benefits and supportive services, where applicable.

4) PHA Roles and Responsibilities

- a) Coordinate and consult with the CoC in developing the services and assistance to be offered under the EHV services fee.
- b) Accept direct referrals for eligible individuals and families through the CoC Coordinated Entry System.
- c) Commit a sufficient number of staff and necessary resources to ensure that the application, certification, and voucher issuance processes are completed in a timely manner.
- d) Commit a sufficient number of staff and resources to ensure that inspections of units are completed in a timely manner.
- e) Designate a staff to serve as the lead EHV liaison.
- f) Comply with the provisions of this MOU.

5) CoC Roles and Responsibilities

- a) Designate and maintain a lead EHV liaison to communicate with the PHA.
- b) Refer eligible individuals and families to PHA in a timely manner using the community's coordinated entry system.
- c) Comply with the provisions of this MOU.

6) Third Party Entity Roles and Responsibilities

- a) Third-Parties may include emergency shelters, housing, and/or service providers.
- b) Third-Parties will fulfill each of the following responsibilities:
 - i) Support eligible individuals and households in completing and applying for supportive documentation to accompany admissions application to the PHA (i.e. self-certifications, birth certificate, social security card, etc.).
 - ii) Attend EHV participant briefings when needed.
 - iii) Assess all households referred for EHV for mainstream benefits and supportive services available to support eligible individuals and families through their transition.
 - iv) Identify and provide available supportive services to EHV families. (While EHV participants are not required to participate in services, the CoC should assure that services are available, offered to eligible households, and are accessible.)
 - v) Comply with the provisions of this MOU.
- c) Victim Service Providers (VSPs) will fulfill each of the following responsibilities:
 - i) VSPs will participate in a case-conferencing effort with MACCH to refer eligible households who wouldn't be referred through the MACCH coordinated entry process due to the nature of domestic violence processes and service connections
 - ii) VSPs will commit a sufficient number of staff and necessary resources to ensure eligible households referred for an EHV are connected to OHA to support the application, certification and voucher issuance processes are completed in a timely manner.
 - iii) Comply with the provisions of this MOU.

7) Program Evaluation

The PHA, and CoC or designated CoC recipient agree to cooperate with HUD, provide requested data to HUD or HUD-approved contractor delegated the responsibility of program evaluation protocols established by HUD or HUD-approved contractor.

Signed by

Signature on file _____	7/15/2021 _____
Joanie Poore, CEO, OHA	Date

Signature on file _____	7/15/2021 _____
Randy McCoy, Executive Director, MACCH	Date

Exhibit TPS-2: HOMELESS PROVIDER'S CERTIFICATION

Attachment 3 of Notice PIH 2021-15 Example of a Homeless Provider's Certification

Emergency Housing Voucher (EHV)

HOMELESS CERTIFICATION

EHV Applicant Name: _____

☐ Household without dependent children (complete one form for each adult in the household)

☐ Household with dependent children (complete one form for household)

Number of persons in the household: _____

This is to certify that the above named individual or household meets the following criteria based on the check mark, other indicated information, and signature indicating their current living situation-

Check only one box and complete only that section

Living Situation: place not meant for human habitation (e.g., cars, parks, abandoned buildings, streets/sidewalks)

☐ The person(s) named above is/are currently living in (or, if currently in hospital or other institution, was living in immediately prior to hospital/institution admission) a public or private place not designed for, or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus station, airport, or camp ground.

Description of current living situation:

Homeless Street Outreach Program

Name: _____

This certifying agency must be recognized by the local Continuum of Care (CoC) as an agency that has a program designed to serve persons living on the street or other places not meant for human habitation. Examples may be street outreach workers, day shelters, soup kitchens, Health Care for the Homeless sites, etc.

Authorized Agency Representative Signature: _____

Date: _____

Living Situation: Emergency Shelter

☐ The person(s) named above is/are currently living in (or, if currently in hospital or other institution, was living in immediately prior to hospital/institution admission) a supervised publicly or privately operated shelter as follows:

Emergency Shelter Program Name: _____

This emergency shelter must appear on the CoC's Housing Inventory Chart submitted as part of the most recent CoC Homeless Assistance application to HUD or otherwise be recognized by the CoC as part of the CoC inventory (e.g., newly established Emergency Shelter).

Authorized Agency Representative Signature: _____ Date
: _____

Living Situation: Recently Homeless

☐ The person(s) named above is/are currently receiving financial and supportive services for persons who are homeless. Loss of such assistance would result in a return to homelessness (ex. Households in Rapid Rehousing Programs, residents of Permanent Supportive Housing Programs participating in Moving On, etc.)

Authorized Agency Representative Signature: _____

This referring agency must appear on the CoC's Housing Inventory Chart submitted as part of the most recent CoC Homeless Assistance application to HUD or otherwise be recognized by the CoC as part of the CoC inventory.

Immediately prior to entering the household's current living situation, the person(s) named above was/were residing in:

☐ emergency shelter OR ☐ a place unfit for human habitation

Authorized Agency Representative Signature: _____
Date: _____

Exhibit TPS-3: EXAMPLE OF A VICTIM SERVICES PROVIDER'S CERTIFICATION

Attachment 4 of Notice PIH 2021-15: Example of a Victim Services Provider's Certification

Emergency Housing Voucher (EHV)

SAMPLE HUMAN TRAFFICKING CERTIFICATION

Purpose of Form:

The Victims of Trafficking and Violence Protection Act of 2000 provides assistance to victims of trafficking making housing, educational health care, job training and other Federally-funded social service programs available to assist victims in rebuilding their lives.

Use of This Optional Form:

In response to this request, the service provider may complete this form and submit it to the Public Housing Agency (PHA) to certify eligibility for EHV assistance.

Confidentiality: All information provided to the service provider concerning the incident(s) of human trafficking shall be kept confidential and such details shall not be entered into any shared database. Employees of OHA will not have access to these details, and such employees may not disclose this information to any other entity or individual, except to the extent that disclosure is: (i) consented to by you in writing in a time-limited release; (ii) required for use in an eviction proceeding or hearing regarding termination of assistance; or (iii) otherwise required by applicable law.

TO BE COMPLETED ON BEHALF OF HUMAN TRAFFICKING SURVIVOR

EHV Applicant Name: _____

This is to certify that the above named individual or household meets the definition for persons who are fleeing or attempting to flee human trafficking under section 107(b) of the Trafficking Victims Protection Act of 2000.

Immediately prior to entering the household's current living situation, the person(s) named above was/were residing in:

This is to certify that the information provided on this form is true and correct to the best of my knowledge and recollection, and that the individual(s) named above is/has been a victim of human trafficking. I acknowledge that submission of false information could jeopardize program eligibility and could be the basis for denial of admission, termination of assistance, or eviction.

Authorized Agency Representative Signature: _____ **Date:** _____

Introduction

HOTMA CHANGES IN THE ADMINISTRATIVE PLAN

On July 29, 2016, the Housing Opportunity Through Modernization Act of 2016 (HOTMA) was signed into law. HOTMA made numerous changes to statutes governing HUD programs, including sections of the United States Housing Act of 1937. Title I of HOTMA contains 14 different sections that impact the public housing and Section 8 programs.

HOTMA 102/104

HUD published a final rule on February 14, 2023, revising regulations related to income, assets, adjusted income, verification, and reexams (among others) to implement Sections 102 and 104 of HOTMA. While the new regulations were effective January 1, 2024, HUD has delayed the compliance date for HOTMA 102/104. Initially, HUD published a delayed compliance date of January 1, 2025, but HUD again delayed the compliance date for HOTMA 102/104 and no new date has been provided. Compliance with Sections 102 and 104 of HOTMA means not only applying HOTMA 102/104 regulations to affected programs but also reporting in HUD's new Housing Information Portal (HIP) system. Currently, PHAs remain unable to comply with HOTMA 102/104 because compliance depends on transitioning from HUD's IMS/PIC system (which is unable to accept HOTMA-compliant Form HUD-50058) to HUD's new HIP system (which will be the only system that accepts HOTMA-compliant Form HUD-50058). PHAs cannot transition to HOTMA until HIP is in place, HOTMA-compliant, and accessible. However, HUD has determined that a few HOTMA 102/104 policies are not dependent on transition systems and easily isolated from other HOTMA 102/104 policy changes. These policies may be implemented prior to the migration to HIP.

HUD stated that PHAs may update their policy documents before determining the date at which they will transition to all HOTMA Section 102 and 104 policies. HUD stated that in order to update their policy documents for HOTMA in this circumstance, PHAs may create an appendix that contains the HOTMA policies that will be incorporated at a later date. The model policy adopts such an approach. HOTMA 102/104 policies are provided in each affected area of the model policy. However, with the exception of the policies HUD has indicated may be adopted early, HOTMA policies that are "on hold" are indicated in the model policy as such. Further, an appendix has been provided to explicitly call out those policies that are on hold.

HOTMA VOUCHER FINAL RULE

The final rule implementing streamlining changes to the HCV and PBV programs 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 discussed above. The rule is known as the “HOTMA voucher final rule.” The effective date of the HOTMA voucher final rule was June 6, 2024. While the compliance date for certain provisions of the rule is the same as the effective date, the compliance date for other provisions is not until 90 days, 180 days, or one year after the effective date. Further, many new changes to the regulations described in the HOTMA voucher final rule require changes to the PHA’s administrative plan. PHAs must make all revisions needed to bring existing policies into compliance with the final rule no later than June 6, 2025 (one year after the effective date). However, if a PHA wishes to use program flexibilities requiring adoption of new local policies not already present in the PHA’s administrative plan, the PHA must add those policies to the administrative plan prior to using those program flexibilities.

Further, the delayed compliance date for policies of June 6, 2025, does not authorize delayed compliance with the provisions of the rule. PHAs that choose not to bring their policies into compliance with the rule until June 6, 2025, must still implement each provision on its compliance date.

In order to identify those provisions of the final rule that are not effective until after June 6, 2024, the model policy states that certain policies are not effective until a specific date.

ABOUT THE ADMINISTRATIVE PLAN

REFERENCES CITED IN THE ADMINISTRATIVE PLAN

The authority for PHA policies is derived from many sources. Primary among these sources are federal statutes, federal regulations, and guidance issued by HUD. State law also directs PHA policy. State law must be followed where such law exists and does not conflict with federal regulations. Industry practice may also be used to develop policy as long as it does not conflict with federal requirements or prohibitions.

HUD

HUD provides the primary source of PHA policy through federal regulations, HUD notices, and handbooks. Compliance with federal regulations, current HUD notices, and current HUD handbooks is mandatory.

HUD also provides guidance to PHAs through other means such as HUD-published guidebooks, expired HUD notices, and expired handbooks. Basing PHA policy on HUD guidance is optional, as long as PHA policies comply with federal law, federal regulations and mandatory policy. Because HUD has already determined that the guidance it provides is consistent with mandatory policies, PHA reliance on HUD guidance provides the PHA with a “safe harbor.”

Material posted on the HUD website can provide further clarification of HUD policies. For example, FAQs on the HUD website can provide direction on the application of federal regulations in various aspects of the program.

State Law

Where there is no mandatory federal guidance, PHAs must comply with state law, if it exists. Where state law is more restrictive than federal law, but does not conflict with it, the PHA should follow the state law.

Industry Practice

Where no law or HUD authority exists on a particular subject, industry practice may support PHA policy. Industry practice refers to a way of doing things or a policy that has been adopted by a majority of PHAs.

NSPIRE AND HQS IN THE ADMINISTRATIVE PLAN

The PHA must determine that the rental unit selected by the family is in safe and habitable condition at certain times prescribed by the regulations. The current applicable inspection standard for the HCV and PBV programs is Housing Quality Standards (HQS). On May 11, 2023, HUD published a final rule implementing the National Standards for the Physical Inspection of Real Estate (NSPIRE final rule), a new approach to defining and assessing housing quality across multiple HUD programs. 24 CFR 5.703 describes the NSPIRE standards, including variations for the HCV and PBV programs. Notice PIH 2023-28 finalized the administrative procedures for NSPIRE as they pertain specifically to the HCV and PBV programs. Collectively, this is known as “NSPIRE-V.”

The compliance date for NSPIRE-V is no later than October 1, 2025, at which point the HQS inspection standard will sunset. PHAs may, however, implement NSPIRE-V prior to October 1, 2025, provided they do so in accordance with requirements in FR Notice 7/5/24.

However, even once the HQS inspection standard has sunset, the regulations at 24 CFR Part 982 and 983 governing the HCV and PBV programs will continue to use the terms *HQS* and *housing quality standards* rather than *NSPIRE*. This is because, the definition of *housing quality standards (HQS)* at 24 CFR 982.4 means the minimum quality standards developed by HUD in accordance with 24 CFR 5.703 for the HCV program, including any variations approved by HUD for the PHA. As such, the model policy uses the term *housing quality standards* whenever applicable regulations use this term. Except in the chapter describing HQS, the acronym *HQS* is not used in the model policy in order to avoid confusion between the umbrella term meaning housing standards and the specific inspection protocol. The model policy only uses the term *NSPIRE* when referring to specific NSPIRE standards.

HOTMA SECTIONS 102 AND 104 CHANGES IN THE MODEL POLICY

On July 29, 2016, the Housing Opportunity Through Modernization Act of 2016 (HOTMA) was signed into law. HOTMA made numerous changes to statutes governing HUD programs, including sections of the United States Housing Act of 1937. Title I of HOTMA contains 14 different sections that impact the public housing and Section 8 programs. HUD published a final rule on February 14, 2023, revising regulations related to income and assets (Sections 102 and 104 of HOTMA). While the new income and asset regulations were effective January 1, 2024, PHAs were instructed to select a compliance date no later than January 1, 2025. *Compliance* with Sections 102 and 104 of HOTMA means not only applying HOTMA regulations to affected programs but also reporting in HUD’s new Housing Information Portal (HIP) system. Currently, PHAs remain unable to select a compliance date because HOTMA compliance depends on transitioning from HUD’s IMS/PIC system (which is unable to accept HOTMA-compliant Form HUD-50058) to HUD’s new HIP system (which will be the only system that accepts HOTMA-compliant Form HUD-50058). Because HOTMA-compliant reexaminations cannot be successfully submitted to IMS/PIC, HUD advised PHAs not to begin conducting reexaminations under HOTMA rules without further information on when the new HOTMA-compliant Form HUD-50058 in HIP will be available. PHAs cannot transition to HOTMA until HIP is in place, HOTMA-compliant, and accessible.

HOTMA VOUCHER FINAL RULE CHANGES IN THE MODEL POLICY

The final rule implementing streamlining changes to the HCV and PBV programs 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 discussed above. The rule is known as the “HOTMA voucher final rule.” The effective date of the HOTMA voucher final rule was June 6, 2024. While the compliance date for certain provisions of the rule is the same as the effective date, the compliance date for other provisions is not until 90 days, 180 days, or one year after the effective date. Further, many new changes to the regulations described in the HOTMA voucher final rule require changes to the PHA’s administrative plan. PHAs must make all revisions needed to bring existing policies into compliance with the final rule no later than June 6, 2025 (one year after the effective date). However, if a PHA wishes to use program flexibilities requiring adoption of new local policies not already present in the PHA’s administrative plan, the PHA must add those policies to the administrative plan prior to using those program flexibilities. Further, the delayed compliance date for policies of June 6, 2025, does not authorize delayed compliance with the provisions of the rule. PHAs that choose not to bring their policies into compliance with the rule until June 6, 2025, must still implement each provision on its compliance date.

In order to identify those provisions of the final rule that are not effective until after June 6, 2024, the model policy states that certain policies are not effective until a specific date.

RESOURCES CITED IN THE ADMINISTRATIVE PLAN

The administrative plan cites several documents. Where a document or resource is cited frequently, it may be abbreviated. Where it is cited only once or twice, the administrative plan may contain the entire name of the document or resource. Following is a key to abbreviations used for various sources that are frequently cited in the administrative plan and a list of references and document locations that are referenced in the administrative plan or that may be helpful to you.

HUD HCV Guidebook

In November 2019 HUD began issuing a new version of the HCV Guidebook chapter-by-chapter. Unlike the previous version of the HCV Guidebook in which chapters were numbered, the new version of the guidebook includes chapter names, but no numbers. As the new version of the guidebook has not yet been fully released, and since the previous version of the guidebook contains guidance not found in the new version, the policy cites both versions of the guidebook. Therefore, where the HCV Guidebook is cited in the policy, the citation will make a distinction between the “old” and “new” versions of the guidebook. The “old” version of the guidebook will continue to be cited as *HCV GB* with a chapter/page reference (example: HCV GB, p. 5-4). If HUD has also released a new chapter on the same topic with information that either adds new information or updates existing information from the previous guidebook, the new guidebook will be cited as *New HCV GB* with a chapter title and page reference (example: New HCV GB, *Payment Standards*, p. 11). On September 29, 2023, HUD issued Notice PIH 2023-27 to implement sections 102 and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA). The notice supersedes relevant portions of the guidebook, specifically the chapters on eligibility, denials, and annual reexaminations and interim reexaminations. Where chapters have not been altered by the HOTMA implementation notice, the model policy continues to cite the HCV Guidebook.

Abbreviations

Throughout the administrative plan, abbreviations are used to designate certain documents in citations. The following is a table of abbreviations of documents cited in the administrative plan.

Abbreviation	Document
CFR	Code of Federal Regulations
HCV GB	Housing Choice Voucher Program Guidebook (7420.10G), April 2001.
New HCV GB	Housing Choice Voucher Program Guidebook (7420.10G), Various dates of release
HUD-50058 IB	HUD-50058 Instruction Booklet
RHIIP FAQs	Rental Housing Integrity Improvement Program (RHIIP) Frequently Asked Questions.
VG	PIH Notice 2004-01 Verification Guidance, March 9, 2004.
HB 4350.3	Occupancy Requirements of Subsidized Multifamily Housing Programs

Resources and Where to Find Them

The HUD website is <https://www.hud.gov/>.

Guidebooks, handbooks, and other HUD resources may be found at the HUDClips website:
https://www.hud.gov/program_offices/administration/hudclips.

Following is a list of resources helpful to the PHA or referenced in the administrative plan, and the online location of each.

Document and Location
Code of Federal Regulations https://www.ecfr.gov/
Eligibility of Students for Assisted Housing Under Section 8 of the U.S. Housing Act of 1937; Final Rule http://edocket.access.gpo.gov/2008/pdf/E8-19435.pdf
Enterprise Income Verification (EIV) System, Security Procedures for Upfront Income Verification data https://www.hud.gov/sites/documents/EIVSECGUIDEPHA.PDF
Executive Order 11063 https://www.archives.gov/federal-register/codification/executive-order/11063.html
Federal Register https://www.federalregister.gov/
Housing Choice Voucher Program Guidebook (7420.10G), Updated Chapters https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/guidebook
HOTMA Final Rule https://www.federalregister.gov/documents/2023/02/14/2023-01617/housing-opportunity-through-modernization-act-of-2016-implementation-of-sections-102-103-and-104?utm_campaign=subscription+mailing+list&utm_source=federalregister.gov&utm_medium=email
HOTMA Implementation Notice, PIH 2023-27 https://www.hud.gov/sites/dfiles/OCHCO/documents/2023-27pihn.pdf
Joint Statement of the Department of Housing and Urban Development and the Department of Justice, issued May 17, 2004 https://www.justice.gov/sites/default/files/crt/legacy/2010/12/14/joint_statement_ra.pdf
Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons, published January 22, 2007 https://www.lep.gov/guidance/HUD_guidance_Jan07.pdf
Notice PIH 2010-26 (HA), Nondiscrimination and Accessibility Notice https://www.hud.gov/sites/documents/DOC_8993.PDF
Notice PIH 2017-12, Administrative Guidance for Effective and Mandated Use of the Enterprise Income Verification (EIV) System https://www.hud.gov/sites/documents/PIH2017-12EIVNOTICE.PDF
VAWA Resources https://www.hud.gov/vawa

HOTMA 102/104 Appendix to the Administrative Plan

Purpose of the Appendix

HUD published a final rule on February 14, 2023, revising regulations related to income, assets, adjusted income, verification, and reexams (among others) to implement Sections 102 and 104 of HOTMA. While the new regulations were effective January 1, 2024, HUD has delayed the compliance date for HOTMA 102/104. Initially, HUD published a delayed compliance date of January 1, 2025, but HUD again delayed the compliance date for HOTMA 102/104 and no new date has been provided. *Compliance* with Sections 102 and 104 of HOTMA means not only applying HOTMA 102/104 regulations to affected programs but also reporting in HUD's new Housing Information Portal (HIP) system. Currently, PHAs remain unable to comply with HOTMA 102/104 because compliance depends on transitioning from HUD's IMS/PIC system (which is unable to accept HOTMA-compliant Form HUD-50058) to HUD's new HIP system (which will be the only system that accepts HOTMA-compliant Form HUD-50058). PHAs cannot transition to HOTMA until HIP is in place, HOTMA-compliant, and accessible. However, HUD has determined that a few HOTMA 102/104 policies are not dependent on transition systems and easily isolated from other HOTMA 102/104 policy changes. These policies may be implemented prior to the migration to HIP.

HUD stated that PHAs may update their policy documents before determining the date at which they will transition to all HOTMA Section 102 and 104 policies. HUD stated that in order to update their policy documents for HOTMA in this circumstance, PHAs may create an appendix that contains the HOTMA policies that will be incorporated at a later date. The model policy adopts such an approach. HOTMA 102/104 policies are provided in each affected area of the model policy. However, with the exception of the policies HUD has indicated may be adopted early, HOTMA policies that are "on hold" are indicated in the model policy as such. Further, an appendix has been provided to explicitly call out those policies that are on hold.

HOTMA 102/104 Policies Not Yet Implemented

Chapter 00

No HOTMA 102/104 policies apply.

Chapter 1

No HOTMA 102/104 policies apply.

Chapter 2

No HOTMA 102/104 policies apply.

Chapter 3

Model policy section 3-I.B. FAMILY AND HOUSEHOLD is amended to comply with section E.1 of Notice PIH 2023-27, Definition of Family
Model policy section 3-I.K. FOSTER CHILDREN AND FOSTER ADULTS is amended to comply with section E.2 of Notice PIH 2023-27, New Definitions of Foster Adult and Foster Child
Model policy section 3-II.D. FAMILY CONSENT TO RELEASE OF INFORMATION is amended to comply with section J.2 of Notice PIH 2023-27, Revocation of Consent
Model Policy section III.C. RESTRICTION ON ASSISTANCE BASED ON ASSETS is added to comply with section A.1 of Notice PIH 2023-27, Asset Limitation

Chapter 4

No HOTMA 102/104 policies apply.

Chapter 5

No HOTMA 102/104 policies apply.

Chapter 6

Prior to the PHA's HOTMA compliance date, the PHA will follow policies in Chapter 6.A.

Upon the PHA's HOTMA compliance date, the PHA will follow policies in Chapter 6.B.

Chapter 7

Prior to the PHA's HOTMA compliance date, the PHA will follow policies in Chapter 7.A.

Upon the PHA's HOTMA compliance date, the PHA will follow policies in Chapter 7.B.

Chapter 8

No HOTMA 102/104 policies apply. However, prior to the NSPIRE compliance date, the PHA will follow policies in Chapter 8.A. Upon the NSPIRE compliance date, the PHA will follow policies in Chapter 8.B.

Chapter 9

No HOTMA 102/104 policies apply.

Chapter 10

No HOTMA 102/104 policies apply.

Chapter 11

Prior to the PHA's HOTMA compliance date, the PHA will follow policies in Chapter 11.A.

Upon the PHA's HOTMA compliance date, the PHA will follow policies in Chapter 11.B.

Chapter 12

Model policy section 12-I.D. MANDATORY TERMINATION OF ASSISTANCE is amended to comply with section J.2 of Notice PIH 2023-27, Revocation of Consent

Model Policy section 12-I.E. MANDATORY POLICIES AND OTHER AUTHORIZED TERMINATIONS is added to comply with section A.1 of Notice PIH 2023-27, Asset Limitation

Chapter 13

No HOTMA 102/104 policies apply.

Chapter 14

Model policy section 14-I.D. PHA-CAUSED ERRORS OR PROGRAM ABUSE is amended to comply with 24 CFR 5.609(c)(4), De Minimis Errors

Chapter 15

No HOTMA 102/104 policies apply.

Chapter 16

No HOTMA 102/104 policies apply.

Chapter 17

No HOTMA 102/104 policies apply.

Chapter 18

No HOTMA 102/104 policies apply.

Chapter 19

No HOTMA 102/104 policies apply.

Glossary

The following definitions are applicable upon the PHA's implementation of HOTMA 102/104:

- Annual income (revised)
- Day laborer
- De minimis error
- Earned income
- Family (revised)
- Foster child
- Foster adult
- Independent contractor
- Inflationary index
- Net family assets (revised)
- Real property
- Seasonal worker
- Unearned income

Chapter 1

OVERVIEW OF THE PROGRAM AND PLAN

INTRODUCTION

The PHA receives its funding for the Housing Choice Voucher (HCV) program from the Department of Housing and Urban Development. The PHA is not a federal department or agency. A public housing agency (PHA) is a governmental or public body, created and authorized by state law to develop and operate housing and housing programs for low-income families. The PHA enters into an Annual Contributions Contract with HUD to administer the program requirements on behalf of HUD. The PHA must ensure compliance with federal laws, regulations and notices and must establish policy and procedures to clarify federal requirements and to ensure consistency in program operation.

This chapter contains information about the PHA and its programs with emphasis on the HCV program. It also contains information about the purpose, intent and use of the plan and guide.

There are three parts to this chapter:

Part I: The Public Housing Agency (PHA). This part includes a description of the PHA, its jurisdiction, its programs, and its mission and intent.

Part II: The HCV Program. This part contains information about the Housing Choice Voucher program operation, roles and responsibilities, and partnerships.

Part III: The HCV Administrative Plan. This part discusses the purpose and organization of the plan and its revision requirements.

PART I: THE PHA

1-I.A. OVERVIEW

This part explains the origin of the PHA's creation and authorization, the general structure of the organization, and the relationship between the PHA Board and staff. **The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.**

1-I.B. ORGANIZATION AND STRUCTURE OF THE PHA

The Section 8 tenant-based Housing Choice Voucher (HCV) assistance program is funded by the federal government and administered by the **Omaha Housing Authority (OHA) for the jurisdiction of Omaha, Ralston, Papillion, LaVista, Elkhorn and Millard, County of Douglas.**

The officials of a PHA are known as commissioners or, collectively, as the board of commissioners. Commissioners are appointed in accordance with state housing law and generally serve in the same capacity as the directors of a corporation, establishing policies under which the PHA conducts business, ensuring that policies are followed by PHA staff and ensuring that the PHA is successful in its mission. The board is responsible for preserving and expanding the agency's resources and assuring the agency's continued viability.

Formal actions of the PHA are taken through written resolutions, adopted by the board of commissioners and entered into the official records of the PHA.

The principal staff member of the PHA is the executive director (ED), hired and appointed by the board of commissioners. The executive director is directly responsible for carrying out the policies established by the board and is delegated the responsibility for hiring, training, and supervising the PHA staff in order to manage the day-to-day operations of the PHA. The executive director is responsible for ensuring compliance with federal and state laws and directives for the programs managed. In addition, the executive director's duties include budgeting and financial planning for the agency.

1-I.C. PHA MISSION

The purpose of a mission statement is to communicate the purpose of the agency to people inside and outside of the agency. It provides guiding direction for developing strategy, defining critical success factors, searching out key opportunities, making resource allocation choices, satisfying clients and stakeholders, and making decisions.

PHA Policy

The mission of the Housing Authority of the City of Omaha is to provide and sustain quality and safe affordable housing.

1-I.D. THE PHA'S PROGRAMS

The following programs are included under this administrative plan:

PHA Policy

The PHA's administrative plan is applicable to the operation of the Housing Choice Voucher program.

OHA administers the following specialized vouchers:

- Project-Based Vouchers
- Protection Vouchers
- Emergency Housing Vouchers
- Incremental Vouchers
- Fairshare Vouchers
- Moderate Rehabilitation
- Home Ownership
- VASH
- Mainstream.

In addition, the administrative plan addresses policies for the following special programs:

- Manufactured home (where the family owns the home and leases the space)
- Homeownership
- Assisted living with VASH

OHA also administers the Family Self-Sufficiency (FSS) Program and HCV policies do pertain to families who participate. FSS coordinators collaborate with public and private agencies, assisting program participants as they work to obtain self-sufficiency through goal-setting and economic independence. (Operations and guidelines for the FSS program are addressed in the FSS Action Plan.)

1-I.E. THE PHA’S COMMITMENT TO ETHICS AND SERVICE

As a public service agency, the PHA is committed to providing excellent service to HCV program participants, owners, and to the community. The PHA’s standards include:

- Administer applicable federal and state laws and regulations to achieve high ratings in performance measurement indicators while maintaining efficiency in program operation to ensure fair and consistent treatment of clients served.
- Provide decent, safe, and sanitary housing – in compliance with program housing quality standards – for very low-income families while ensuring that family rents are fair, reasonable, and affordable.
- Encourage self-sufficiency of participant families and assist in the expansion of family opportunities which address educational, socio-economic, recreational and other human service’s needs.
- Promote fair housing and the equal opportunity for very low-income families of all ethnic backgrounds to experience freedom of housing choice.
- Promote a housing program which maintains quality service and integrity while providing an incentive to private property owners to rent to very low-income families.
- Promote a market-driven housing program that will help qualified low-income families be successful in obtaining affordable housing and increase the supply of housing choices for such families.
- Create positive public awareness and expand the level of family, owner, and community support in accomplishing the PHA’s mission.
- Attain and maintain a high level of standards and professionalism in day-to-day management of all program components.
- Administer an efficient, high-performing agency through continuous improvement of the PHA’s support systems and a high level of commitment to our employees and their development.

The PHA will make every effort to keep program participants informed of HCV program rules and regulations, and to advise participants of how the program rules affect them.

PART II: THE HOUSING CHOICE VOUCHER (HCV) PROGRAM

1-II.A. OVERVIEW AND HISTORY OF THE PROGRAM

The intent of this section is to provide the public and staff with information related to the operation of the program. There have been many changes to the program since its inception in 1974 and a brief history of the program will assist the reader to better understand the program.

The United States Housing Act of 1937 (the “Act”) is responsible for the birth of federal housing program initiatives. The Act was intended to provide financial assistance to states and cities for public works projects, slum clearance and the development of affordable housing developments for low-income residents.

The Housing and Community Development (HCD) Act of 1974 created a new federally assisted housing program – the Section 8 Existing program (also known as the Section 8 Certificate program). The HCD Act represented a significant shift in federal housing strategy from locally owned public housing to privately owned rental housing.

Under the Certificate program, federal housing assistance payments were made directly to private owners of rental housing, where this housing was made available to lower-income families. Eligible families were able to select housing in the private rental market. Assuming that the housing met certain basic physical standards of quality (“housing quality standards”) and was within certain HUD-established rent limitations (“fair market rents”), the family would be able to receive rental assistance in the housing unit. Family contribution to rent was generally set at 30 percent of the family’s adjusted income, with the remainder of the rent paid by the program.

Another unique feature of the Certificate program was that the rental assistance remained with the eligible family, if the family chose to move to another privately-owned rental unit that met program requirements (in contrast to the public housing program where the rental assistance remains with the unit, should the family decide to move). Consequently, the Certificate program was characterized as tenant-based assistance, rather than unit-based assistance.

The Housing and Community Development (HCD) Act of 1987 authorized a new version of tenant-based assistance – the Section 8 Voucher program. The Voucher program was very similar to the Certificate program in that eligible families were able to select housing in the private rental market and receive assistance in that housing unit.

However, the Voucher program permitted families more options in housing selection. Rental housing still had to meet the basic housing quality standards, but there was no fair market rent limitation on rent. In addition, family contribution to rent was not set at a limit of 30 percent of adjusted income. Consequently, depending on the actual rental cost of the unit selected, a family might pay more or less than 30 percent of their adjusted income for rent.

From 1987 through 1999, public housing agencies managed both the Certificate and Voucher tenant-based assistance programs, with separate rules and requirements for each. From 1994 through 1998, HUD published a series of new rules, known as “conforming” rules, to more closely combine and align the two similar housing programs, to the extent permitted by the law.

In 1998, the Quality Housing and Work Responsibility Act (QHWRA) – also known as the Public Housing Reform Act – was signed into law. QHWRA eliminated all statutory differences between the Certificate and Voucher tenant-based programs and required that the two programs be merged into a single tenant-based assistance program, now known as the Housing Choice Voucher (HCV) program.

The HCV program was modeled closely on the pre-merger Voucher program. However, unlike the pre-merger Voucher program, the HCV program requires an assisted family to pay at least 30 percent of adjusted income for rent.

The transition of assistance from the Certificate and Voucher programs to the new HCV program began in October 1999. By October 2001, all families receiving tenant-based assistance were converted to the HCV program.

On July 29, 2016, the Housing Opportunity Through Modernization Act of 2016 (HOTMA) was signed into law. HOTMA made numerous changes to statutes governing HUD programs, including sections of the United States Housing Act of 1937. Title I of HOTMA contains 14 different sections that impact the public housing and Section 8 programs.

- The Final Rule implementing broad changes to income and assets in Sections 102 and 104 of HOTMA, and for PHAs that administer the public housing program over-income provisions in Section 103, was officially published in the *Federal Register* on February 14, 2023. On September 29, 2023, HUD issued notice PIH 2023-27, which provided guidance to PHAs on the implementation of the program changes described in the Final Rule. HUD issued a revised version of the notice on February 2, 2024.
- The Final Rule implementing streamlining changes to the HCV and PBV programs 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.

1-II.B. HCV PROGRAM BASICS

The purpose of the HCV program is to provide rental assistance to eligible families. The rules and regulations of the HCV program are determined by the U.S. Department of Housing and Urban Development. The PHA is afforded choices in the operation of the program which are included in the PHA's-administrative plan, a document approved by the board of commissioners of the PHA.

The HCV program offers mobility to eligible families because they may search for suitable housing anywhere in the PHA's-jurisdiction and may also be eligible to move under portability to other PHAs' jurisdictions.

When a family is determined to be eligible for the program and funding is available, the PHA issues the family a housing voucher. When the family finds a suitable housing unit and funding is available, the PHA will enter into a contract with the owner and the family will enter into a lease with the owner. Each party makes their respective payment to the owner so that the owner receives full rent.

Even though the family is determined to be eligible for the program, the owner has the responsibility of approving the family as a suitable renter. The PHA continues to make payments to the owner as long as the family is eligible, and the housing unit continues to qualify under the program.

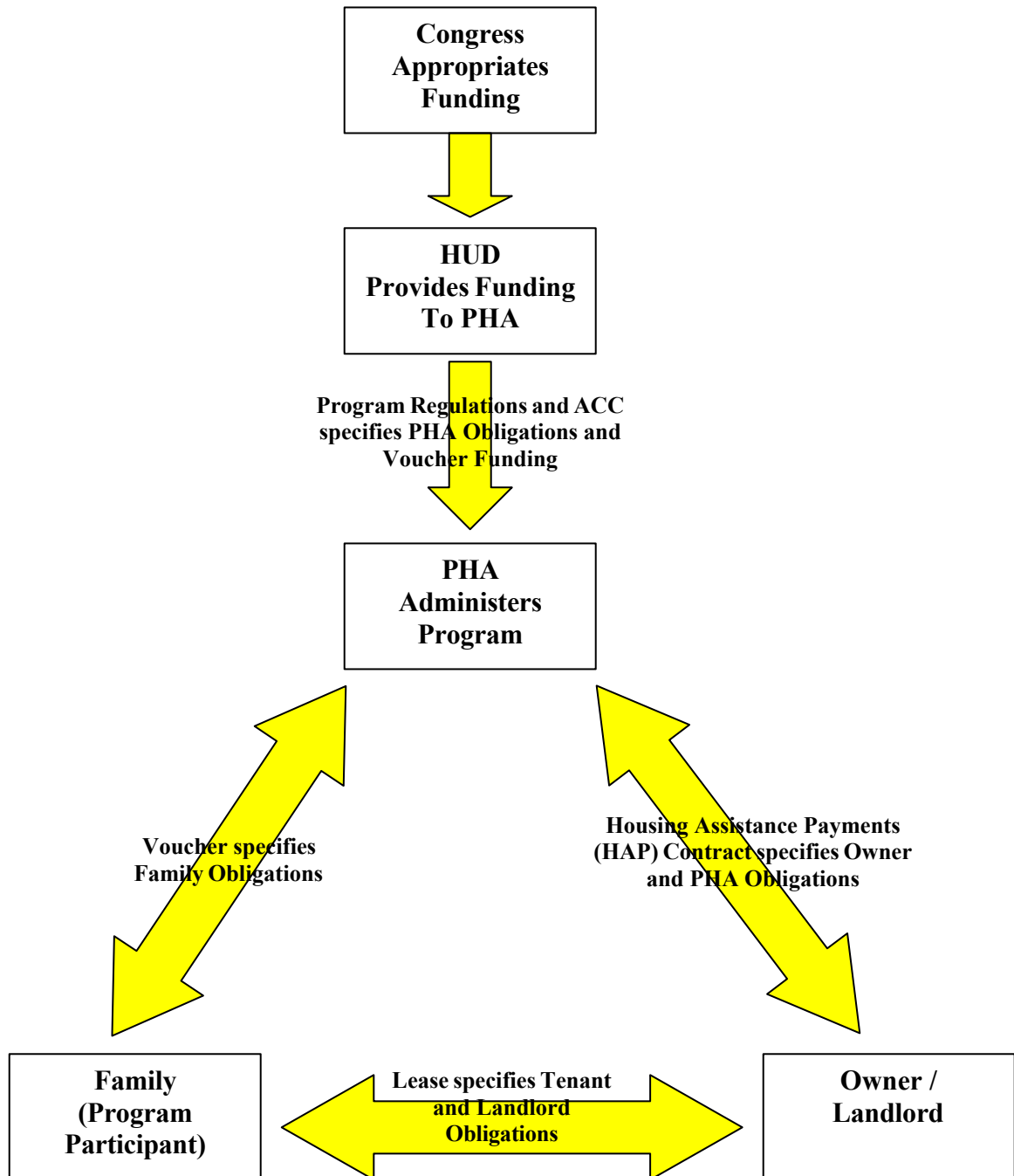
1-II.C. THE HCV PARTNERSHIPS

To administer the HCV program, the PHA enters into a contractual relationship with HUD (Consolidated Annual Contributions Contract). The PHA also enters into contractual relationships with the assisted family and the owner or landlord of the housing unit.

For the HCV program to work and be successful, all parties involved – HUD, the PHA, the owner, and the family – have important roles to play. The roles and responsibilities of all parties are defined in federal regulations and in legal documents that parties execute to participate in the program.

The chart on the following page illustrates key aspects of these relationships.

The HCV Relationships:



What Does HUD Do?

HUD has the following major responsibilities:

- Develop regulations, requirements, handbooks, notices and other guidance to implement HCV housing program legislation passed by Congress;
- Allocate HCV program funds to PHAs;
- Provide technical assistance to PHAs on interpreting and applying HCV program requirements;
- Monitor PHA compliance with HCV program requirements and PHA performance in program administration.

What Does the PHA Do?

The PHA administers the HCV program under contract with HUD and has the following major responsibilities:

- Establish local policies to administer the program;
- Review applications from interested applicants to determine whether they are eligible for the program;
- Maintain a waiting list and select families for admission;
- Issue vouchers to eligible families and provide information on how to lease a unit;
- Conduct outreach to owners, with special attention to owners outside areas of poverty or minority concentration;
- Approve the rental unit (including assuring compliance with housing quality standards and rent reasonableness), the owner, and the tenancy;
- Make housing assistance payments to the owner in a timely manner;
- Recertify families for continued eligibility under the program;
- Ensure that owners and families comply with their contractual obligations;
- Provide families and owners with prompt, professional service;
- Comply with all fair housing and equal opportunity requirements, HUD regulations and requirements, the Annual Contributions Contract, HUD-approved applications for funding, the PHA's administrative plan, and other applicable federal, state and local laws.

What Does the Owner Do?

The owner has the following major responsibilities:

- Screen families who apply for tenancy, to determine suitability as renters.
 - The PHA can provide some information to the owner, but the primary responsibility for tenant screening rests with the owner.
 - The owner should consider family background factors such as rent and bill-paying history, history of caring for property, respecting the rights of others to peaceful enjoyment of the property, compliance with essential conditions of tenancy, whether the family is engaging in drug-related criminal activity or other criminal activity that might threaten others.
- Comply with the terms of the Housing Assistance Payments contract executed with the PHA;
- Comply with all applicable fair housing laws and do not discriminate against anyone;
- **Maintain the housing unit in accordance with ~~National Standards for the Physical Inspection of Real Estate (NSPIRE)~~ minimum quality standards developed by HUD in accordance with 24 CFR 5.703 (including any variations approved by HUD for the PHA) and make necessary repairs in a timely manner;**
- Collect rent due from the assisted family and otherwise comply with and enforce provisions of the dwelling lease.

What Does the Family Do?

The family has the following responsibilities:

- Provide the PHA with complete and accurate information as determined by the PHA to be necessary for administration of the program;
- Make their best and most timely efforts to locate qualified and suitable housing;
- Attend all appointments scheduled by the PHA;
- Allow the PHA to inspect the unit at reasonable times and after reasonable notice;
- Take responsibility for care of the housing unit, including any violations of housing quality standards caused by the family;
- Comply with the terms of the lease with the owner;
- Comply with the family obligations of the voucher;
- Not commit serious or repeated violations of the lease;
- Not engage in drug-related or violent criminal activity;
- Notify the PHA and the owner before moving or terminating the lease;
- Use the assisted unit only for residence and as the sole residence of the family. Not sublet the unit, assign the lease, or have any interest in the unit;
- Promptly notify the PHA of any changes in family composition;
- Not commit fraud, bribery, or any other corrupt or criminal act in connection with any housing programs.

1-II.D. APPLICABLE REGULATIONS

Applicable regulations include:

- 24 CFR Part 5: General Program Requirements
- 24 CFR Part 8: Nondiscrimination
- 24 CFR Part 35: Lead-Based Paint
- 24 CFR Part 100: The Fair Housing Act
- 24 CFR Part 982: Section 8 Tenant-Based Assistance: Housing Choice Voucher Program
- 24 CFR Part 983: Project-Based Vouchers
- 24 CFR Part 985: The Section 8 Management Assessment Program (SEMAP)

PART III: THE HCV ADMINISTRATIVE PLAN

1-III.A. OVERVIEW AND PURPOSE OF THE PLAN

The administrative plan is required by HUD. The purpose of the administrative plan is to establish policies for carrying out the programs in a manner consistent with HUD requirements and local goals and objectives contained in the PHA's agency plan. This administrative plan is a supporting document to the PHA-agency plan and is available for public review as required by CFR 24 Part 903.

This administrative plan is set forth to define the PHA's local policies for operation of the housing programs in accordance with federal laws and regulations. All issues related to the HCV program not addressed in this document are governed by such federal regulations, HUD handbooks and guidebooks, notices, and other applicable laws. The policies in this administrative plan have been designed to ensure compliance with the consolidated ACC and all HUD- approved applications for program funding.

The PHA is responsible for complying with all changes in HUD regulations pertaining to the HCV program. If such changes conflict with this plan, HUD regulations will have precedence.

Administration of the HCV program and the functions and responsibilities of PHA staff shall be in compliance with the PHA's personnel policy and HUD regulations as well as all federal, state and local fair housing laws and regulations.

1-III.B. CONTENTS OF THE PLAN [24 CFR 982.54]

The HUD regulations at 24 CFR 982.54 define the policies that must be included in the administrative plan. They are as follow:

- Selection and admission of applicants from the PHA waiting list, including any PHA admission preferences, procedures for removing applicant names from the waiting list, and procedures for closing and reopening the PHA waiting list (Chapter 4);
- Issuing or denying vouchers, including PHA policy governing the voucher term and any extensions of the voucher term. If the PHA decides to allow extensions of the voucher term, the PHA administrative plan must describe how the PHA determines whether to grant extensions, and how the PHA determines the length of any extension (Chapter 5);
- Any special rules for use of available funds when HUD provides funding to the PHA for a special purpose (e.g., desegregation), including funding for specified families or a specified category of families (Chapter 4);

- Occupancy policies, including definition of what group of persons may qualify as a 'family', definition of when a family is considered to be 'continuously assisted'; standards for denying admission or terminating assistance based on criminal activity or alcohol abuse in accordance with 982.553 (Chapters 3 and 12);
- Encouraging participation by owners of suitable units located outside areas of low income or minority concentration (Chapter 13);
- Assisting a family that claims that illegal discrimination has prevented the family from leasing a suitable unit (Chapter 2);
- Providing information about a family to prospective owners (Chapters 3 and 9);
- Disapproval of owners (Chapter 13);
- Subsidy standards (Chapter 5);
- Family absence from the dwelling unit (Chapter 12);
- How to determine who remains in the program if a family breaks up (Chapter 3);
- Informal review procedures for applicants (Chapter 16);
- Informal hearing procedures for participants (Chapter 16);
- The process for establishing and revising voucher payment standards ~~including policies on administering decreases in the payment standard during the HAP contract term~~ (Chapter 16);
- Policies on administering decreases and increases in the payment standard during the HAP contract term (Chapter 6);
- The method of determining that rent to the owner is a reasonable rent (initially and during the term of a HAP contract) (Chapter 8);
- Special policies concerning special housing types in the program (e.g., use of shared housing) (Chapter 15);
- Policies concerning payment by a family to the PHA or amounts the family owes the PHA (Chapter 16);
- Interim redeterminations of family income and composition (Chapter 11);
- Restrictions, if any, on the number of moves by a participant family (Chapter 10);
- Approval by the board of commissioners or other authorized officials to charge the administrative fee reserve (Chapter 16);
- Procedural guidelines and performance standards for conducting required housing quality standards inspections (Chapter 8); and
- PHA screening of applicants for family behavior or suitability for tenancy (Chapter 3).
- Policies governing the project-basing of vouchers in both the standard Project-Based Voucher (PBV) program (Chapter 17) and the RAD Project-Based Voucher program (Chapter 18); and
- Special policies governing any special purpose vouchers issued by the PHA (Chapter 19).

Mandatory vs. Discretionary Policy

HUD makes a distinction between:

- Mandatory policies: those driven by legislation, regulations, current handbooks, notices, and legal opinions, and
- Optional, non-binding guidance, including guidebooks, notices that have expired and recommendations from individual HUD staff.

HUD expects PHAs to adopt local policies and procedures that are consistent with mandatory policies in areas where HUD gives the PHA discretion. The PHA's administrative plan is the foundation of those policies and procedures. HUD's directions require PHAs to make policy choices that provide sufficient guidance to staff and ensure consistency to program applicants and participants.

Creating policies based upon HUD guidance is not mandatory but provides a PHA with a "safe harbor." HUD has already determined that the recommendations and suggestions it makes are consistent with mandatory policies. If a PHA adopts an alternative strategy, it must make its own determination that the alternative approach is consistent with legislation, regulations, and other mandatory requirements. There may be very good reasons for adopting a policy or procedure that is different than HUD's safe harbor, but PHAs should carefully think through those decisions.

1-III.C. ORGANIZATION OF THE PLAN

The plan is organized to provide information to users in particular areas of operation.

1-III.D. UPDATING AND REVISING THE PLAN

The PHA will revise this administrative plan as needed to comply with changes in HUD regulations. The original plan and any changes must be approved by the board of commissioners of the agency, the pertinent sections included in the Agency Plan, and a copy provided to HUD.

PHA Policy

The PHA will review and update the plan as needed, to reflect changes in regulations, PHA operations, or when needed to ensure staff consistency in operation.

Chapter 2

FAIR HOUSING AND EQUAL OPPORTUNITY

This chapter explains the laws and HUD regulations requiring THE PHA to affirmatively further civil rights and fair housing in all federally assisted housing programs. The letter and spirit of these laws are implemented through consistent policy and processes. The responsibility to further nondiscrimination pertains to all areas of THE PHA's housing choice voucher (HCV) operations.

The Omaha Housing Authority (THE PHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

This chapter describes HUD regulations and PHA policies related to these topics in three parts:

Part I: Nondiscrimination. This part presents the body of laws and regulations governing the responsibilities of the PHA regarding nondiscrimination.

Part II: Policies Related to Persons with Disabilities. This part discusses the rules and policies of the housing choice voucher program related to reasonable accommodation for persons with disabilities. These rules and policies are based on the Fair Housing Act (42.U.S.C.) and Section 504 of the Rehabilitation Act of 1973, and incorporate guidance from the Joint Statement of The Department of Housing and Urban Development and the Department of Justice (DOJ), issued May 17, 2004.

Part III: Prohibition of Discrimination Against Limited English Proficiency Persons. This part details the obligations of the PHA to ensure meaningful access to the HCV program and its activities by persons with limited English proficiency (LEP). This part incorporates the Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons published January 22, 2007, in the *Federal Register*.

PART I: NONDISCRIMINATION

2-I.A. OVERVIEW

Federal laws require PHA's to treat all applicants and participants equally, providing the same quality of service, regardless of family characteristics and background. Federal law prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, age, familial status, and disability. In addition, HUD regulations provide for additional protections regarding sexual orientation, gender identity, and marital status. THE PHA will comply fully with all federal, state, and local nondiscrimination laws, and with rules and regulations governing fair housing and equal opportunity in housing and employment, including:

- Title VI of the Civil Rights Act of 1964
- Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)
- Executive Order 11063
- Section 504 of the Rehabilitation Act of 1973
- The Age Discrimination Act of 1975
- Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern)
- Violence Against Women Reauthorization Act of 2013 (VAWA)
- The Equal Access to Housing in HUD Programs regardless of Sexual or Gender Identity Final Rule, published in the *Federal Register* February 3, 2012 and further clarified in Notice PIH 2014-20.

When more than one civil rights law applies to a situation, the laws will be read and applied together.

Any applicable state laws or local ordinances and any legislation protecting individual rights of tenants, applicants, or staff that may subsequently be enacted will also apply.

PHA Policy

THE PHA will abide by all state or local nondiscrimination laws or ordinances.

2-I.B. NONDISCRIMINATION

Federal regulations prohibit discrimination against certain protected classes and other groups of people. State and local requirements, as well as PHA policies, can prohibit discrimination based on other factors.

THE PHA shall not discriminate because of race, color, sex, religion, familial status, age, disability or national origin (called “protected classes”)

Familial status includes children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18.

THE PHA will not discriminate on the basis of marital status, gender identity or sexual orientation. (FR Notice 02/03/12; Executive Order 13988.)

PHA Policy

The PHA does not identify any additional protected classes.

The PHA will not use any of these factors to:

- Deny to any family the opportunity to apply for housing, nor deny to any qualified applicant the opportunity to participate in the housing choice voucher program.
- Provide housing that is different from that provided to others
- Subject anyone to segregation or disparate treatment
- Subject anyone to sexual harassment
- Restrict anyone's access to any benefit enjoyed by others in connection with the housing program
- Treat a person differently in determining eligibility or other requirements for admission
- Steer an applicant or participant toward or away from a particular area based any of these factors
- Deny anyone access to the same level of services
- Deny anyone the opportunity to participate in a planning or advisory group that is an integral part of the housing program
- Discriminate in the provision of residential real estate transactions
- Discriminate against someone because they are related to or associated with a member of a protected class
- Publish or cause to be published an advertisement or notice indicating the availability of housing that prefers or excludes persons who are members of a protected class.

Providing Information to Families and Owners

THE PHA must take steps to ensure that families and owners are fully aware of all applicable civil rights laws. As part of the briefing process, THE PHA must provide information to HCV applicant families about civil rights requirements and the opportunity to rent in a broad range of neighborhoods [24 CFR 982.301]. The Housing Assistance Payments (HAP) contract informs owners of the requirement not to discriminate against any person because of race, color, religion, sex, national origin, age, familial status, or disability in connection with the contract.

2-I.C. DISCRIMINATION COMPLAINTS

General Housing Discrimination Complaints

If an applicant or participant believes that any family member has been discriminated against by the PHA or an owner, the family should advise the PHA. The PHA should make every reasonable attempt to determine whether the applicant's or participant's assertions have merit and take any warranted corrective action.

In all cases, the PHA will advise the family that they may file a fair housing complaint if the family feels they have been discriminated against under the Fair Housing Act.

PHA Policy

Applicants or participants who believe that they have been subject to unlawful discrimination may notify the PHA either orally or in writing.

Within 10 business days of receiving the complaint, the PHA will investigate and attempt to remedy the discrimination complaints made against them. The PHA will also advise the family of their right to file a fair housing complaint with HUD's Office of Fair Housing and Equal Opportunity (FHEO). The fair housing poster, posted in conspicuous and accessible locations in PHA lobbies, will reference how to file a complaint with FHEO.

The PHA will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)

Complaints under the Equal Access Final Rule

Notice PIH 2014-20 requires an articulated complaint process for allegations of discrimination under the Equal Access Final rule. The Equal Access Final Rule requires that PHAs provide equal access regardless of marital status, gender identity, or sexual orientation. The PHA will be informed on these obligations by the HUD Field Office or FHEO when an Equal Access complaint investigation begins.

PHA Policy

Applicants or tenant families who believe that they have been subject to unlawful discrimination based on marital status, gender identity, or sexual orientation under the Equal Access Rule may notify the PHA either orally or in writing.

Within 10 business days of receiving the complaint, the PHA will provide a written notice to those alleged to have violated the rule. The PHA will also send a written notice to the complainant informing them that notice was sent to those alleged to have violated the rule, as well as information on how to complete and submit a housing discrimination complaint form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).

The PHA will attempt to remedy discrimination complaints made against the PHA and will conduct an investigation into all allegations of discrimination.

Within 10 business days following the conclusion of the PHA's investigation, the PHA will provide the complainant and those alleged to have violated the rule with findings and either a proposed corrective action plan or an explanation of why corrective action is not warranted.

The PHA will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)

VAWA Complaint Processing [Notice FHEO 2023-01]

A complainant may, not later than one year after an alleged VAWA violation has occurred or terminated, file a complaint with FHEO alleging such violation. If there is a violation that began prior to a year before the complaint is filed, but it continues into the one-year time period, HUD will accept the complaint. FHEO will investigate the complaint if it is timely and FHEO otherwise has jurisdiction. If a complaint is filed more than one year after the alleged violation occurred or terminated, FHEO may, but is not required to, investigate the allegations under the additional authority and procedures described in FHEO 2023-01.

Complaints do not need to allege a violation of the Fair Housing Act for FHEO to accept and investigate the complaint.

PHA Policy

Applicants or tenant families who wish to file a VAWA complaint against the PHA may notify the PHA either orally or in writing.

The PHA will advise the family of their right to file a VAWA complaint with HUD's Office of Fair Housing and Equal Opportunity (FHEO). The PHA will inform the family that not later than one year after an alleged VAWA violation has occurred or terminated, applicants and tenants who believe they have been injured by a VAWA violation or will be injured by such a violation that is about to occur may file a VAWA complaint using FHEO's online complaint form via mail, email, or telephone.

The PHA will attempt to remedy complaints made against the PHA and will conduct an investigation into all allegations of discrimination.

The PHA will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)

PART II: POLICIES RELATED TO PERSONS WITH DISABILITIES

2-II.A. OVERVIEW

One type of disability discrimination prohibited by the Fair Housing Act is the refusal to make reasonable accommodation in rules, policies, practices, or services when such accommodation may be necessary to afford a person with a disability the equal opportunity to use and enjoy a program or dwelling under the program.

The PHA must ensure that persons with disabilities have full access to the PHA's programs and services. This responsibility begins with the first contact by an interested family and continues through every aspect of the program.

PHA Policy

The PHA will ask all applicants and participants if they require any type of accommodations, in writing, on the intake application, reexamination documents, and notices of adverse action by the PHA, by including the following language:

“If you or anyone in your family is a person with disabilities, and you require a specific accommodation in order to fully utilize our programs and services, please contact the housing authority.”

A specific name and phone number of designated staff will be provided to process requests for accommodation.

The PHA will display posters and other housing information and signage in locations throughout the PHA's office in such a manner as to be easily readable from a wheelchair.

2-II.B. DEFINITION OF REASONABLE ACCOMMODATION

A person with a disability may require special accommodations in order to have equal access to the HCV program. The types of reasonable accommodations the PHA can provide include changes, exceptions, or adjustments to a rule, policy, practice, or service.

Federal regulations stipulate that requests for accommodations will be considered reasonable if they do not create an "undue financial and administrative burden" for the PHA, or result in a "fundamental alteration" in the nature of the program or service offered. A fundamental alteration is a modification that alters the essential nature of a provider's operations.

Types of Reasonable Accommodations

When needed, the PHA will modify normal procedures to accommodate the needs of a person with disabilities. Examples include:

- Permitting applications and reexaminations to be completed by mail
- Conducting home visits
- Using higher payment standards (either within the acceptable range or with HUD approval of a payment standard outside the PHA range) if the PHA determines this is necessary to enable a person with disabilities to obtain a suitable housing unit
- Providing time extensions for locating a unit when necessary because of lack of availability of accessible units or special challenges of the family in seeking a unit
- Permitting an authorized designee or advocate to participate in the application or certification process and any other meetings with PHA staff
- **Allowing exceptions to the PHA's subsidy standards**
- **Allowing a change in the family's rent due date to correspond with the receipt of the head of household, or spouse or cohead's SSI or SSDI benefits**

2-II.C. REQUEST FOR AN ACCOMMODATION

If an applicant or participant indicates that an exception, change, or adjustment to a rule, policy, practice, or service is needed because of a disability, HUD requires that the PHA treat the information as a request for a reasonable accommodation, even if no formal request is made [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

The family must explain what type of accommodation is needed to provide the person with the disability full access to the PHA's programs and services.

If the need for the accommodation is not readily apparent or known to the PHA, the family must explain the relationship between the requested accommodation and the disability. There must be an identifiable connection, or nexus, between the requested accommodation and the individual's disability.

PHA Policy

The PHA will encourage the family to make its request in writing using a reasonable accommodation request form. However, the PHA will consider the accommodation any time the family indicates that an accommodation is needed whether or not a formal written request is submitted.

2-II.D. VERIFICATION OF DISABILITY

The regulatory civil rights definition for persons with disabilities is provided in Exhibit 2-1 at the end of this chapter. The definition of a person with a disability for the purpose of obtaining a reasonable accommodation is much broader than the HUD definition of disability which is used for waiting list preferences and income allowances.

Before providing an accommodation, the PHA must determine that the person meets the definition of a person with a disability, and that the accommodation will enhance the family's access to the PHA's programs and services.

If a person's disability is obvious or otherwise known to the PHA, and if the need for the requested accommodation is also readily apparent or known, no further verification will be required [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

If a family indicates that an accommodation is required for a disability that is not obvious or otherwise known to the PHA, the PHA must verify that the person meets the definition of a person with a disability, and that the limitations imposed by the disability require the requested accommodation.

When verifying a disability, the PHA will follow the verification policies provided in Chapter 7. All information related to a person's disability will be treated in accordance with the confidentiality policies provided in Chapter 16. In addition to the general requirements that govern all verification efforts, the following requirements apply when verifying a disability:

- Third-party verification must be obtained from an individual identified by the family who is competent to make the determination. A doctor or other medical professional, a peer support group, a non-medical service agency, or a reliable third party who is in a position to know about the individual's disability may provide verification of a disability [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act]
- The PHA must request only information that is necessary to evaluate the disability-related need for the accommodation. The PHA will not inquire about the nature or extent of any disability.
- Medical records will not be accepted or retained in the participant file.
- In the event that the PHA does receive confidential information about a person's specific diagnosis, treatment, or the nature or severity of the disability, the PHA will dispose of it. In place of the information, the PHA will note in the file that the disability and other requested information have been verified, the date the verification was received, and the name and address of the knowledgeable professional who sent the information [Notice PIH 2010-26].

2-II.E. APPROVAL/DENIAL OF A REQUESTED ACCOMMODATION [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act, Notice PIH 2010-26].

The PHA must approve a request for an accommodation if the following three conditions are met:

- The request was made by or on behalf of a person with a disability.
- There is a disability-related need for the accommodation.
- The requested accommodation is reasonable, meaning it would not impose an undue financial and administrative burden on the PHA, or fundamentally alter the nature of the PHA's HCV operations (including the obligation to comply with HUD requirements and regulations).

Requests for accommodations must be assessed on a case-by-case basis, taking into account factors such as the overall size of the PHA's program with respect to the number of employees, type of facilities and size of budget, type of operation including composition and structure of workforce, the nature and cost of the requested accommodation, and the availability of alternative accommodations that would effectively meet the family's disability-related needs.

Before making a determination whether to approve the request, the PHA may enter into discussion and negotiation with the family, request more information from the family, or may require the family to sign a consent form so that the PHA may verify the need for the requested accommodation.

PHA Policy

After a request for an accommodation is presented, the PHA will respond in writing within 10 business days.

If the PHA denies a request for an accommodation because there is no relationship, or nexus, found between the disability and the requested accommodation, the notice will inform the family of the right to appeal the PHA's decision through an informal review (if applicable) or informal hearing (see Chapter 16).

If the PHA denies a request for an accommodation because it is not reasonable (it would impose an undue financial and administrative burden or fundamentally alter the nature of the PHA's operations), the PHA will discuss with the family whether an alternative accommodation could effectively address the family's disability-related needs without a fundamental alteration to the HCV program and without imposing an undue financial and administrative burden.

If the PHA believes that the family has failed to identify a reasonable alternative accommodation after interactive discussion and negotiation, the PHA will notify the family in writing of its determination within 10 business days from the date of the most recent discussion or communication with the family.

2-II.F. PROGRAM ACCESSIBILITY FOR PERSONS WITH HEARING OR VISION IMPAIRMENTS [24 CFR 8.6]

HUD regulations require the PHA to ensure that persons with disabilities related to hearing and vision have reasonable access to the PHA's programs and services [24 CFR 8.6].

At the initial point of contact with each applicant, the PHA shall inform all applicants of alternative forms of communication that can be used other than plain language paperwork.

PHA Policy

To meet the needs of persons with hearing impairments, TTD/TTY (text telephone display/teletype) communication will be available.

To meet the needs of persons with vision impairments, large-print and audio versions of key program documents will be made available upon request. When visual aids are used in public meetings or presentations, or in meetings with PHA staff, one-on-one assistance will be provided upon request.

Additional examples of alternative forms of communication are sign language interpretation; having material explained orally by staff; or having a third party representative (a friend, relative or advocate, named by the applicant) to receive, interpret and explain housing materials and be present at all meetings.

The PHA shall provide additional time and shall extend due dates for compliance with program requirements upon request for persons with disabilities related to vision, hearing, speech and visual impairments. This includes any cases when the PHA has requested information or made other communication in a format that is not readily accessible for the person. It also includes any other case when a person with vision, hearing, or speech impairments may need additional time for effective communication to complete paperwork or other program requirements.

2-II.G. PHYSICAL ACCESSIBILITY

THE PHA must comply with a variety of regulations pertaining to physical accessibility, including the following:

- Notice PIH 2010-26
- Section 504 of the Rehabilitation Act of 1973
- The Americans with Disabilities Act of 1990
- The Architectural Barriers Act of 1968
- The Fair Housing Act of 1988

The PHA's policies concerning physical accessibility must be readily available to applicants and participants. They can be found in three key documents:

- This plan describes the key policies that govern the PHA's responsibilities with regard to physical accessibility.
- Notice PIH 2010-26 summarizes information about pertinent laws and implementing regulations related to nondiscrimination and accessibility in federally-funded housing programs.
- The PHA Plan provides information about self-evaluation, needs assessment, and transition plans.

The design, construction, or alteration of PHA facilities must conform to the Uniform Federal Accessibility Standards (UFAS). Newly constructed facilities must be designed to be readily accessible to and usable by persons with disabilities. Alterations to existing facilities must be accessible to the maximum extent feasible, defined as not imposing an undue financial and administrative burden on the operations of the HCV program.

When issuing a voucher to a family that includes an individual with disabilities, the PHA will include a current list of available accessible units known to the PHA and will assist the family in locating an available accessible unit, if necessary.

In general, owners must permit the family to make reasonable modifications to the unit. However, the owner is not required to pay for the modification and may require that the unit be restored to its original state at the family's expense when the family moves.

2-II.H. DENIAL OR TERMINATION OF ASSISTANCE

A PHA's decision to deny or terminate the assistance of a family that includes a person with disabilities is subject to consideration of reasonable accommodation [24 CFR 982.552 (2)(iv)].

When applicants with disabilities are denied assistance, the notice of denial must inform them of the PHA's informal review process and their right to request an informal review. In addition, the notice must inform applicants with disabilities of their right to request reasonable accommodations to participate in the informal review process.

When a participant family's assistance is terminated, the notice of termination must inform them of the PHA's informal hearing process and their right to request a hearing and reasonable accommodation.

When reviewing reasonable accommodation requests, the PHA must consider whether any mitigating circumstances can be verified to explain and overcome the problem that led to the PHA's decision to deny or terminate assistance. If a reasonable accommodation will allow the family to meet the requirements, the PHA must make the accommodation.

PART III: IMPROVING ACCESS TO SERVICES FOR PERSONS WITH LIMITED ENGLISH PROFICIENCY (LEP)

2-III.A. OVERVIEW

Language for Limited English Proficiency Persons (LEP) can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by the HCV program. In certain circumstances, failure to ensure that LEP persons can effectively participate in or benefit from federally-assisted programs and activities may violate the prohibition under Title VI against discrimination on the basis of national origin. This part incorporates the Final Guidance to Federal Assistance Recipients Regarding Title VI Prohibition against National Origin Discrimination Affecting Limited English Proficient Persons, published January 22, 2007, in the *Federal Register*.

The PHA 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).

LEP is defined as persons who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. For the purposes of this administrative plan, LEP persons are HCV applicants and participants, and parents and family members of applicants and participants.

In order to determine the level of access needed by LEP persons, the PHA will balance the following four factors: (1) the number or proportion of LEP persons eligible to be served or likely to be encountered by the Housing Choice Voucher program; (2) the frequency with which LEP persons come into contact with the program; (3) the nature and importance of the program, activity, or service provided by the program to people's lives; and (4) the resources available to the PHA and costs. Balancing these four factors will ensure meaningful access by LEP persons to critical services while not imposing undue burdens on the PHA.

2-III.B. ORAL INTERPRETATION

The PHA will offer competent interpretation services free of charge, upon request, to the LEP person.

PHA Policy

The PHA will utilize a language line for telephone interpreter services.

When exercising the option to conduct remote briefings, informal reviews, or hearings, however, the PHA will coordinate with a remote interpretation service which, when available, uses video conferencing technology rather than voice-only interpretation.

Where LEP persons desire, they will be permitted to use, at their own expense, an interpreter of their own choosing, in place of or as a supplement to the free language services offered by the PHA. The PHA, at its discretion, may choose to use the language services even when LEP persons desire to use an interpreter of their choosing. The interpreter may be a family member or friend. If the interpreter chosen by the family is a minor, the PHA will not rely on the minor to serve as the interpreter.

The PHA will analyze the various kinds of contacts it has with the public, to assess language needs and decide what reasonable steps should be taken. "Reasonable steps" may not be reasonable where the costs imposed substantially exceed the benefits.

Where feasible and possible, ~~according to its language assistance plan (LAP),~~ the PHA will train and hire bilingual staff to be available to act as interpreters and translators, will pool resources with other PHAs, and will standardize documents.

2-III.C. WRITTEN TRANSLATION

Translation is the replacement of a written text from one language into an equivalent written text in another language.

PHA Policy

In order to comply with written-translation obligations, the PHA will take the following steps:

The PHA will provide written translations of vital documents for each eligible LEP language group that constitutes 5 percent or 1,000 persons, whichever is less, of the population of persons eligible to be served or likely to be affected or encountered. Translation of other documents, if needed, can be provided orally; or

If there are fewer than 50 persons in a language group that reaches the 5 percent trigger, the PHA does not translate vital written materials, but provides written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost.

2-III.D. IMPLEMENTATION PLAN

After completing the four-factor analysis and deciding what language assistance services are appropriate, the PHA shall determine whether it is necessary to develop a written implementation plan to address the identified needs of the LEP populations it serves.

If the PHA determines that it is not necessary to develop a written implementation plan, the absence of a written plan does not obviate the underlying obligation to ensure meaningful access by LEP persons to the PHA's Housing Choice Voucher program and services.

PHA Policy

If it is determined that the PHA serves very few LEP persons, and the PHA has very limited resources, the PHA will not develop a written LEP plan, but will consider alternative ways to articulate in a reasonable manner a plan for providing meaningful access. Entities having significant contact with LEP persons, such as schools, grassroots and faith-based organizations, community groups, and groups working with new immigrants will be contacted for input into the process.

If the PHA determines it is appropriate to develop a written LEP plan, the following five steps will be taken: (1) Identifying LEP individuals who need language assistance; (2) identifying language assistance measures; (3) training staff; (4) providing notice to LEP persons; and (5) monitoring and updating the LEP plan.

EXHIBIT 2-1: DEFINITION OF A PERSON WITH A DISABILITY UNDER FEDERAL CIVIL RIGHTS LAWS [24 CFR Parts 8.3 and 100.201]

A person with a disability, as defined under federal civil rights laws, is any person who:

- Has a physical or mental impairment that substantially limits one or more of the major life activities of an individual, or
- Has a record of such impairment, or
- Is regarded as having such impairment

The phrase “physical or mental impairment” includes:

- Any physiological disorder or condition, cosmetic or disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or
- Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term “physical or mental impairment” includes, but is not limited to: such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism.

“Major life activities” includes, but is not limited to, caring for oneself, performing manual tasks, walking, seeing, hearing, breathing, learning, and/or working.

“Has a record of such impairment” means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

“Is regarded as having an impairment” is defined as having a physical or mental impairment that does not substantially limit one or more major life activities but is treated by a public entity (such as the PHA) as constituting such a limitation; has none of the impairments defined in this section but is treated by a public entity as having such an impairment; or has a physical or mental impairment that substantially limits one or more major life activities, only as a result of the attitudes of others toward that impairment.

The definition of a person with disabilities does not include:

- Current illegal drug users
- People whose alcohol use interferes with the rights of others
- Persons who objectively pose a direct threat or substantial risk of harm to others that cannot be controlled with a reasonable accommodation under the HCV program

The above definition of disability determines whether an applicant or participant is entitled to any of the protections of federal disability civil rights laws. Thus, a person who does not meet this disability is not entitled to a reasonable accommodation under federal civil rights and fair housing laws and regulations.

The HUD definition of a person with a disability is much narrower than the civil rights definition of disability. The HUD definition of a person with a disability is used for purposes of receiving the disabled family preference, the \$400 elderly/disabled household deduction, the \$480 dependent deduction, the allowance for medical expenses, or the allowance for disability assistance expenses.

The definition of a person with a disability for purposes of granting a reasonable accommodation request is much broader than the HUD definition of disability. Many people will not qualify as a disabled person under the HCV program, yet an accommodation is needed to provide equal opportunity.

Chapter 3

ELIGIBILITY

INTRODUCTION

The PHA is responsible for ensuring that every individual and family admitted to the HCV program meets all program eligibility requirements. This includes any individual approved to join the family after the family has been admitted to the program. The family must provide any information needed by the PHA to confirm eligibility and determine the level of the family's assistance.

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

To be eligible for the HCV program:

- The applicant family must:
 - Qualify as a family as defined by HUD and the PHA.
 - Have income at or below HUD-specified income limits.
 - Qualify on the basis of citizenship or the eligible immigrant status of family members.
 - Provide social security number information for household members as required.
 - Consent to the PHA's collection and use of family information as provided for in PHA-provided consent forms.
 - Not currently be receiving a duplicative subsidy.
 - **Meet net asset and property ownership restriction requirements.**
- The PHA must determine that the current or past behavior of household members does not include activities that are prohibited by HUD or the PHA.

This chapter contains three parts:

Part I: Definitions of Family and Household Members. This part contains HUD and PHA definitions of family and household members and explains initial and ongoing eligibility issues related to these members.

Part II: Basic Eligibility Criteria. This part discusses income eligibility, and rules regarding citizenship, social security numbers, and family consent.

Part III: Denial of Assistance. This part covers factors related to an applicant's past or current conduct (e.g., criminal activity) that can cause the PHA to deny assistance as well as the asset limitation for HCV.

PART I: DEFINITIONS OF FAMILY AND HOUSEHOLD MEMBERS

3-I.A. OVERVIEW

Some eligibility criteria and program rules vary depending upon the composition of the family requesting assistance. In addition, some requirements apply to the family as a whole and others apply to individual persons who will live in the assisted unit. This part provides information that is needed to correctly identify family and household members, and to apply HUD's eligibility rules.

3-I.B. FAMILY AND HOUSEHOLD [24 CFR 982.201(c); HUD-50058 IB, p. 13; FR Notice 02/03/12]

The terms *family* and *household* have different meanings in the HCV program.

Family

To be eligible for assistance, an applicant must qualify as a family. *Family* as defined by HUD includes, but is not limited to the following, regardless of actual or perceived sexual orientation, gender identity, or marital status, a single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person. ~~an otherwise eligible youth who has attained at least 18 years of age and not more than 24 years of age and who has left foster care or will leave foster care within 90 days, in accordance with a transition plan described in section 475 (5)(H) of the Social Security Act (42 U.S.C. 675 (5)(H)), and is homeless or at risk of becoming homeless at the age 16 or older; or a group of persons residing together.~~

Such group includes but is not limited to a family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family), an elderly family, a near-elderly family, a disabled family, a displaced family, and the remaining member of a tenant family. The PHA has the discretion to determine if any other group of persons qualifies as a family.

Gender Identity means actual or perceived gender characteristics.

Sexual orientation means homosexuality, heterosexuality, or bisexuality.

PHA Policy

A family also includes two or more individuals who are not related by blood, marriage, adoption, or other operation of law but who either can demonstrate that they have lived together previously or certify that each individual's income and other resources will be available to meet the needs of the family.

Each family must identify the individuals to be included in the family at the time of application and must notify the PHA if the family's composition changes.

Upon the PHA's HOTMA 102/104 compliance date, the above definition of family will be amended to include: An otherwise eligible youth who has attained at least 18 years of age and not more than 24 years of age and who has left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act (42 U.S.C. 675(5)(H)), and is homeless or is at risk of becoming homeless at age 16 or older; or a group of persons residing together.

Household

Household is a broader term that includes additional people who, with OHA's permission, live in an assisted unit, such as live-in aides, foster children, and foster adults.

3-I.C. FAMILY BREAK-UP AND REMAINING MEMBER OF TENANT FAMILY

Family Break-up [24 CFR 982.315; Notice PIH 2017-08]

Except under the following conditions, the PHA has discretion to determine which members of an assisted family continue to receive assistance if the family breaks up:

- If the family breakup results from an occurrence of domestic violence, dating violence, sexual assault, stalking, or human trafficking, the PHA must ensure that the victim retains assistance. (For documentation requirements and policies related to domestic violence, dating violence, sexual assault, stalking, and human trafficking, see section 16-IX.D of this plan.)
- In accordance with VASH vouchers, when the veteran is the perpetrator of domestic violence, dating violence, sexual assault, stalking, or human trafficking, the victim must continue to be assisted. Upon termination of the perpetrators' HUD-VASH voucher, the victim should be given a regular HCV if one is available, and the perpetrator's HUD-VASH voucher should be used to serve another eligible family. If a regular HCCBV is not available, the victim will continue to use the HUD-VASH voucher, which must be issued to another eligible family upon the voucher's turnover.
- If a court determines the disposition of property between members of the assisted family, the PHA is bound by the court's determination of which family members continue to receive assistance

PHA Policy

A split household results when a single household with more than one adult separates, and forms two or more smaller households. The PHA will permit split households upon written request, review and approval.

When a family on the waiting list breaks up into two otherwise eligible families, only one of the new families may retain the original application date. Other former family members may make a new application with a new application date if the waiting list is open.

If a family breaks up into two otherwise eligible families while receiving assistance, only one of the new families will continue to be assisted.

In the absence of a judicial decision, or an agreement among the original family members, The PHA will determine which family will retain their placement on the waiting list or continue to receive assistance. In making this determination the PHA will take into consideration the following factors: (1) the interest of any minor children, including custody arrangements; (2) the interest of any ill, elderly, or disabled family members, (3) the interest of any family member family member that is a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, including a family member who is forced to leave an assisted unit as a result of such actual or threatened abuse, and (4) any possible risks to family as a result of criminal activity; and (5) the recommendations of social service professionals.

Remaining Member of a Tenant Family [24 CFR 5.403]

The HUD definition of family includes the *remaining member of a tenant family*, which is a member of an assisted family who remains in the unit when other members of the family have left the unit. Household members such as live-in aides, foster children, and foster adults do not qualify as remaining members of a family.

If dependents are the only “remaining members of a tenant family” and there is no family member able to assume the responsibilities of the head of household, see Chapter 6, Section 6-I.B, for the policy on “Caretakers for a Child.”

3-I.D. HEAD OF HOUSEHOLD [24 CFR 5.504(b)]

Head of household means the adult member of the family who is considered the head for purposes of determining income eligibility and rent. The head of household is responsible for ensuring that the family fulfills all of its responsibilities under the program, alone or in conjunction with a cohead or spouse.

PHA Policy

The family may designate any qualified family member as the head of household.

The head of household must have the legal capacity to enter into a lease under state and local law. A minor who is emancipated under state law may be designated as head of household.

3-I.E. SPOUSE, COHEAD, AND OTHER ADULT

A family may have a spouse or cohead, but not both [HUD-50058 IB, p. 13].

Spouse means the marriage partner of the head of household.

PHA Policy

A *marriage partner* includes the partner in a “common law” marriage as defined in state law. The term “spouse” does not apply to friends, roommates, or significant others who are not marriage partners. A minor who is emancipated under state law may be designated as a spouse.

A *cohead* is an individual in the household who is equally responsible with the head of household for ensuring that the family fulfills all of its responsibilities under the program, but who is not a spouse. A family can have only one cohead.

PHA Policy

Minors who are emancipated under state law may be designated as a cohead.

Other adult means a family member, other than the head, spouse, or cohead, who is 18 years of age or older. Foster adults and live-in aides are not considered other adults.

3-I.F. DEPENDENTS AND MINORS [24 CFR 5.603]

A *minor* is a member of the family, other than the head of family or spouse, who is under 18 years of age.

A *dependent* is a family member who is under 18 years of age or a person of any age who is a person with a disability or a full-time student, except that the following persons can never be dependents: the head of household, spouse, cohead, foster children/adults and live-in aides. Identifying each dependent in the family is important because each dependent qualifies the family for a deduction from annual income as described in Chapter 6.

Joint Custody of Dependents

PHA Policy

Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 50 percent or more of the time.

When more than one applicant or participant family is claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, OHA will make the determination based on available documents such as court orders, or an IRS return showing which family has claimed the child for income tax purposes.

3-I.G. FULL-TIME STUDENT [24 CFR 5.603, HVC GB p. 5-29]

A *full-time student* (FTS) is a person who is attending school or vocational training on a full-time basis. The time commitment or subject load that is needed to be full-time is defined by the educational institution.

Identifying each FTS is important because (1) each family member that is an FTS, other than the head, spouse, or cohead, qualifies the family for a dependent deduction and (2) the earned income of such an FTS is treated differently from the income of other family members.

3-I.H. ELDERLY AND NEAR-ELDERLY PERSONS, AND ELDERLY FAMILY [24 CFR 5.100 and 5.403, FR Notice 02/03/12]

Elderly Persons

An *elderly person* is a person who is at least 62 years of age.

Near-Elderly Persons

A *near-elderly person* is a person who is 50 - 61 years of age.

Elderly Family

An *elderly family* is one in which the head, spouse, cohead, or sole member is an elderly person. Identifying elderly families is important because these families qualify for special deductions from income as described in Chapter 6.

3-I.I. PERSONS WITH DISABILITIES AND DISABLED FAMILY

[24 CFR 5.403, FR Notice 02/03/12]

Persons with Disabilities

Under the HCV program, special rules apply to persons with disabilities and to any family whose head, spouse, or cohead is a person with disabilities. The technical definitions of individual with handicaps and persons with disabilities are provided in Exhibit 3-1 at the end of this chapter. These definitions are used for a number of purposes including ensuring that persons with disabilities are not discriminated against based upon disability.

As discussed in Chapter 2, OHA must make all aspects of the HCV program accessible to persons with disabilities and consider reasonable accommodations requested based upon a person's disability.

Disabled Family

A *disabled family* is one in which the head, spouse, or cohead is a person with disabilities. Identifying disabled families is important because these families qualify for special deductions from income as described in Chapter 6.

Even though persons with drug or alcohol dependencies are considered persons with disabilities, this does not prevent the PHA from denying assistance for reasons related to alcohol and drug abuse following policies found in Part III of this chapter, or from terminating assistance following the policies in Chapter 12.

3-I.J. GUESTS [24 CFR 5.100]

A *guest* is a person temporarily staying in the unit with the consent of a member of the household who has express or implied authority to so consent.

PHA Policy

A guest can remain in the assisted unit no longer than 30 consecutive days or a total of 90 cumulative calendar days during any 12-month period.

Children who are subject to a joint custody arrangement or for whom a family has visitation privileges, that are not included as a family member because they live outside of the assisted household more than 50 percent of the time, are not subject to the time limitations of guests as described above.

A family may request an exception to this policy for valid reasons (e.g., care of a relative recovering from a medical procedure is expected to last 40 consecutive days). An exception will not be made unless the family can identify and provide documentation of the residence to which the guest will return.

3-I.K. FOSTER CHILDREN AND FOSTER ADULTS [24 CFR 5.603]

Prior to the PHA's HOTMA 102/104 compliance date, the following policy on foster children and foster adults will be used:

Foster adults are usually persons with disabilities, unrelated to the tenant family, who are unable to live alone [24 CFR 5.609].

The term *foster child* is not specifically defined by the regulations.

Foster children and foster adults who are living with an applicant or who have been approved by the PHA to live with a participant family are considered household members but not family members. The income of foster children/adults is not counted in family annual income, and foster children/adults do not qualify for a dependent deduction [24 CFR 5.603; HUD-50058 IB, p. 13].

PHA Policy

A *foster child* is a child that is in the legal guardianship or custody of a state, county, or private adoption or foster care agency, yet is cared for by foster parents in their own homes, under some kind of short-term or long-term foster care arrangement with the custodial agency.

A foster child or foster adult may be allowed to reside in the unit if their presence would not result in a violation of HQS space standards according to 24 CFR 982.401.

Children that are temporarily absent from the home as a result of placement in foster care are discussed in Section 3-I.L.

Upon the PHA's HOTMA 102/104 compliance date, the following will replace the above section on foster children and foster adults:

A *foster adult* is a member of the household who is 18 years of age or older and meets the definition of a *foster adult* under state law. In general, a foster adult is a person who is 18 years of age or older, is unable to live independently due to a debilitating physical or mental condition, and is placed with the family by an authorized placement agency or by judgment, decree, or other order of any court of competent jurisdiction.

A *foster child* is a member of the household who meets the definition of a *foster child* under state law. In general, a foster child is placed with the family by an authorized placement agency (e.g., public child welfare agency) or by judgment, decree, or other order of any court of competent jurisdiction.

Foster children and foster adults who are living with an applicant or who have been approved by the PHA to live with a participant family are considered household members but not family members. The income of foster children/adults is not counted in family annual income, and foster children/adults do not qualify for a dependent deduction [24 CFR 5.603; HUD-50058 IB, p. 13].

PHA Policy

A foster child or foster adult may be allowed to reside in the unit if their presence would not result in a violation of space standards as described in Section 8-I.F. of this policy.

Children that are temporarily absent from the home as a result of placement in foster care are discussed in Section 3-I.L.

3-I.L. ABSENT FAMILY MEMBERS

Individuals may be absent from the family, either temporarily or permanently, for a variety of reasons

including educational activities, placement in foster care, employment, illness, incarceration, and court order.

Definitions of Temporarily and Permanently Absent

PHA Policy

Generally, an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member.

Generally, an individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.

Absent Students

PHA Policy

When someone who has been considered a family member attends school away from home, the person will continue to be considered a family member unless information becomes available to the PHA indicating that the student has established a separate household or the family declares that the student has established a separate household.

Absences Due to Placement in Foster Care [24 CFR 5.403]

Children temporarily absent from the home as a result of placement in foster care are considered members of the family.

PHA Policy

If a child has been placed in foster care, OHA will verify with the appropriate agency whether and when the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted as a family member.

Absent Head, Spouse, or Cohead

PHA Policy

An employed head, spouse, or cohead absent from the unit more than 180 consecutive days due to employment will not continue to be considered a family member.

Family Members Permanently Confined for Medical Reasons [HCV GB, p. 5-22]

If a family member is confined to a nursing home or hospital on a permanent basis, that person is no longer considered a family member and the income of that person is not counted [HCV GB, p. 5-22].

PHA Policy

An individual confined to a nursing home or hospital on a permanent basis is not considered a family member.

The PHA will request verification of the family member's permanent absence from a responsible medical professional. If the responsible medical professional cannot provide a determination, the person will be considered temporarily absent. If the family certifies that the family member is confined on a permanent basis, they may present, and OHA will consider, any additional documentation or evidence.

Return of Permanently Absent Family Members

PHA Policy

The family must request PHA approval for the return of any adult family members that PHA previously determined to be permanently absent. The individual is subject to the eligibility and screening requirements discussed elsewhere in this chapter.

3-I.M. LIVE-IN AIDE

Live-in aide is a person who resides with one or more elderly persons, or near-elderly persons, or persons with disabilities, and who: (1) is determined to be essential to the care and well-being of the persons, (2) is not obligated for the support of the persons, and (3) would not be living in the unit except to provide the necessary supportive services [24 CFR 5.403].

OHA must approve a live-in aide if needed as a reasonable accommodation in accordance with 24 CFR 8, to make the program accessible to and usable by the family member with disabilities.

The income of live-in-aide is not counted in the calculation of annual income for the family [24 CFR 5.609(b)]. Relatives may be approved as live-in aides if they meet all of the criteria defining a live-in aide. Because live-in aides are not *family* members, a relative who serves as a live-in aide would not be considered a remaining member of a tenant family.

PHA Policy

~~A family's request for a live-in aide must be made in writing. Written verification will be required from a reliable, knowledgeable professional, such as a doctor, social worker, or case worker, that the live-in aide is essential for the care and well-being of the elderly, near-elderly, or disabled family member. For continued approval, the family must submit a new written request, subject to OHA verification, at each annual reexamination.~~

A family's request for a live-in aide may be made either orally or in writing. The PHA will verify the need for a live-in aide with a reliable, knowledgeable professional, such as a doctor, social worker, or case worker, unless the disability-related need is apparent or known to the PHA. For continued approval, the family may be required to submit a new, written request-subject to PHA verification at each annual reexamination.

In addition, the family and live-in aide will be required to submit a certification stating that the live-in aide is (1) not obligated for the support of the person(s) needing the care, and (2) would not be living in the unit except to provide the necessary supportive services.

The PHA will not approve a particular person as a live-in aide, and may withdraw such approval if [24 CFR 982.316(b)]:

- The person commits fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;

- The person commits drug-related criminal activity or violent criminal activity; or

- The person currently owes rent or other amounts to OHA or to another PHA in connection with Section 8 or public housing assistance under the 1937 Act.

The PHA will notify the family of its decision in writing within 10 business days of receiving a request for a live-in aide, including all required documentation related to the request.

PART II: BASIC ELIGIBILITY CRITERIA

3-II.A. INCOME ELIGIBILITY AND TARGETING

Income Limits

HUD establishes income limits for all areas of the country and publishes them annually in the *Federal Register*. They are based upon estimates of median family income with adjustments for family size. The income limits are used to determine eligibility for the program and for income targeting purposes as discussed in this section.

Definition of Income Limits [24 CFR 5.603(b)]

Low-income family. A family whose annual income does not exceed 80 percent of the median income for the area, adjusted for family size.

Very low-income family. A family whose annual income does not exceed 50 percent of the median income for the area, adjusted for family size.

Extremely low-income family. A family whose annual income does not exceed 30 percent of the median income for the area, adjusted for family size.

Area median income is determined by HUD, with adjustments for smaller and larger families. HUD may establish income ceilings higher or lower than 30, 50, or 80 percent of the median income for an area if HUD finds that such variations are necessary because of unusually high or low family incomes.

Using Income Limits for Eligibility [24 CFR 982.201 and Notice PIH 2023-27]

Income limits are used for eligibility only at admission. Income eligibility is determined by comparing the annual income of an applicant to the applicable income limit for their family size. Income and net family assets of household members are excluded when determining income eligibility; however, household members are considered for purposes of unit size and subsidy standards. In order to be income eligible, an applicant family must be one of the following:

- A very low- income family
- A low-income family that has been "continuously assisted" under the 1937 Housing Act. A family is considered to be continuously assisted if the family is already receiving assistance under any 1937 Housing Act program at the time the family is admitted to the HCV program [24 CFR 982.4; 24 CFR 982.201(b)]

PHA Policy

The PHA will consider a family to be continuously assisted if the family was leasing a unit under any 1937 Housing Act program at the time they were selected from the PHA's waiting list.

- A low-income family that qualifies for voucher assistance as a non-purchasing household living in HOPE 1 (public housing homeownership), HOPE 2 (multifamily housing homeownership) developments, or other HUD-assisted multifamily homeownership programs covered by 24 CFR 248.173

- A low-income or moderate-income family that is displaced as a result of the prepayment of a mortgage or voluntary termination of a mortgage insurance contract on eligible low-income housing as defined in 24 CFR 248.101.
- A low-income family is eligible for assistance under VASH [FR Notice 8/13/24]. See Chapter 19 of this policy for more information.

HUD permits the PHA to establish additional categories of low-income families that may be determined eligible. The additional categories must be consistent with the PHA plan and the consolidated plans for local governments within the PHA's jurisdiction.

PHA Policy

The PHA has not established any additional categories of eligible low-income families.

Using Income Limits for Targeting [24 CFR 982.201]

At least 75 percent of the families admitted to OHA's program during a OHA fiscal year must be extremely low-income families. HUD may approve exceptions to this requirement if OHA demonstrates that it has made all required efforts but has been unable to attract an adequate number of qualified extremely low-income families.

Families continuously assisted under the 1937 Housing Act and families living in eligible low-income housing that are displaced as a result of prepayment of a mortgage or voluntary termination of a mortgage insurance contract are not counted for income targeting purposes.

3-II.B. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5, Subpart E]

Housing assistance is available only to individuals who are U.S. citizens, U.S. nationals (herein referred to as citizens and nationals), or noncitizens that have eligible immigration status. At least one family member must be a citizen, national, or noncitizen with eligible immigration status in order for the family to qualify for any level of assistance.

All applicant families must be notified of the requirement to submit evidence of their citizenship status when they apply. Where feasible, and in accordance with the PHA's Limited English Proficiency Plan, the notice must be in a language that is understood by the individual if the individual is not proficient in English.

Declaration [24 CFR 5.508]

HUD requires each family member to declare whether the individual is a citizen, a national, or an eligible noncitizen, except those members who elect not to contend that they have eligible immigration status. Those who elect not to contend their status are considered to be ineligible noncitizens. For citizens, nationals and eligible noncitizens the declaration must be signed personally by the head, spouse, cohead, and any other family member 18 or older, and by a parent or guardian for minors. The family must identify in writing any family members who elect not to contend their immigration status (see Ineligible Noncitizens below). No declaration is required for live-in aides, foster children, or foster adults.

U.S. Citizens and Nationals

In general, citizens and nationals are required to submit only a signed declaration that claims their status. However, HUD regulations permit the PHA to request additional documentation of their status, such as a passport.

PHA Policy

Family members who declare 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 Noncitizens

In addition to providing a signed declaration, those declaring eligible noncitizen status must sign a verification consent form and cooperate with PHA efforts to verify their immigration status as described in Chapter 7. The documentation required for establishing eligible noncitizen status varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, the person's age, and the date on which the family began receiving HUD-funded assistance.

Lawful residents of the Marshall Islands, the Federated States of Micronesia, and Palau, together known as the Freely Associated States, or FAS, are eligible for housing assistance under section 141 of the Compacts of Free Association between the U.S. Government and the Governments of the FAS [Public Law 106-504].

Ineligible Noncitizens

Those noncitizens who do not wish to contend their immigration status are required to have their names listed on a noncontending family members listing, signed by the head, spouse, or cohead (regardless of citizenship status), indicating their ineligible immigration status. OHA is not required to verify a family member's ineligible status and is not required to report an individual's unlawful presence in the U.S. to the United States Citizenship and Immigration Services (USCIS).

Providing housing assistance to noncitizen students is prohibited [24 CFR 5.522]. This prohibition extends to the noncitizen spouse of a noncitizen student as well as to minor children who accompany or follow to join the noncitizen student. Such prohibition does not extend to the citizen spouse of a noncitizen student or to the children of the citizen spouse and noncitizen student. Such a family is eligible for prorated assistance as a mixed family.

Mixed Families

A family is eligible for assistance as long as at least one member is a citizen, national, or eligible noncitizen. Families that include eligible and ineligible individuals are considered *mixed families*. Such families will be given notice that their assistance will be prorated, and that they may request a hearing if they contest this determination. See Chapter 6 for a discussion of how rents are prorated, and Chapter 16 for a discussion of informal hearing procedures.

Ineligible Families [24 CFR 5.514(d), (e), and (f)]

A PHA may elect to provide assistance to a family before the verification of the eligibility of the individual or one family member [24 CFR 5.512(b)]. Otherwise, no individual or family may be assisted prior to the affirmative establishment by OHA that the individual or at least one family member is eligible. Verification of eligibility for this purpose occurs when the individual or family members have submitted documentation to OHA in accordance with program requirements [24 CFR 5.512(a)].

PHA Policy

The PHA will not provide assistance to a family before the verification of at least one family member.

When a PHA determines that an applicant family does not include any citizens, nationals, or eligible noncitizens, following the verification process, the family will be sent a written notice within 10 business days of the determination.

The notice will explain the reasons for the denial of assistance, that the family may be eligible for proration of assistance, and will advise the family of its right to request an appeal to the United States Citizenship and Immigration Services (USCIS) or to request an informal hearing with the PHA. The informal hearing with the PHA may be requested in lieu of the USCIS appeal, or at the conclusion of the USCIS appeal process. The notice must also inform the applicant family that assistance may not be delayed until the conclusion of the USCIS appeal process, but that it may be delayed pending the completion of the informal hearing process.

Informal hearing procedures are contained in Chapter 16.

Timeframe for Determination of Citizenship Status [24 CFR 5.508(g)]

For new occupants joining the assisted family OHA must verify status at the first interim or regular reexamination following the person's occupancy, whichever comes first.

If an individual qualifies for a time extension for the submission of required documents, OHA must grant such an extension for no more than 30 days [24 CFR 5.508(h)].

Each family member is required to submit evidence of eligible status only one time during continuous occupancy.

PHA Policy

The PHA will verify the citizenship status of applicants at the time other eligibility factors are determined.

3-II.C. SOCIAL SECURITY NUMBERS [24 CFR 5.216 and 5.218, Notice PIH 2018-24]

The applicant and all members of the applicant's household must disclose the complete and accurate social security number (SSN) assigned to each household member, and the documentation necessary to verify each SSN. If a child under age 6 has been added to an applicant family within 6 months prior to voucher issuance, an otherwise eligible family may be admitted to the program and must disclose and document the child's SSN within 90 days of the effective date of the initial HAP contract. A detailed discussion of acceptable documentation is provided in Chapter 7.

Note: These requirements do not apply to noncitizens who do not contend eligible immigration status

~~In addition, each participant who has not previously disclosed an SSN has previously disclosed an SSN that HUD or the SSA determined was invalid or has been issued a new SSN must submit their complete and accurate SSN and documentation required to verify the SSN at the time of the next interim or annual reexamination or recertification. Participants aged 62 or older as of January 31, 2010, whose determination of eligibility was begun before January 31, 2010, are exempt from this requirement and remain exempt even if they move to a new assisted unit.~~

The PHA must deny assistance to an applicant family if they do not meet the SSN disclosure, and documentation and requirements contained in 24 CFR 5.216.

3-II.D. 3-II.D. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 5.230, 24 CFR 5.232, and HCV GB, p. 5-13]

HUD requires each adult family member, and the head of household, spouse, or cohead, regardless of age, to sign form HUD-9886, Authorization for the Release of Information/Privacy Act Notice, the form HUD-52675 Debts Owed to Public Housing Agencies and Terminations, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. Chapter 7 provides detailed information concerning the consent forms and verification requirements. **The consent form remains effective until the family is denied assistance, assistance is terminated, or the family provides written notification to revoke consent.**

The PHA must deny admission to the program if any member of the applicant family fails to sign and submit the consent forms for obtaining information in accordance with 24 CFR 5, Subparts B and F [24 CFR 982.552(b)(3) and 24 CFR 5.232(a)].

Upon the PHA's HOTMA 102/104 compliance date, the following on revocation of consent is added:

However, this does not apply if the applicant or participant, or any member of their family, revokes their consent with respect to the ability of the PHA to access financial records from financial institutions, unless the PHA establishes a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance [24 CFR 5.232(c)].

PHA Policy

The PHA has established a policy that revocation of consent to access financial records will result in denial of admission.

3-II.E. STUDENTS ENROLLED IN INSTITUTIONS OF HIGHER EDUCATION [24 CFR 5.612 and FR Notice 4/10/06, FR Notice 9/21/16]

Section 327 of Public Law 109-115 and the implementing regulation at 24 CFR 5.612 established new restrictions on the eligibility of certain students (both part- and full-time) who are enrolled in institutions of higher education.

If a student enrolled at an institution of higher education is under the age of 24, is not a veteran, is not married, and does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the student's eligibility must be examined along with the income eligibility of the student's parents. In these cases, both the student and the student's parents must be income eligible for the student to receive HCV assistance. If, however, a student in these circumstances is determined independent from his/her parents in accordance with OHA policy, the income of the student's parents will not be considered in determining the student's eligibility.

The new law does not apply to students who reside with parents who are applying to receive HCV assistance. It is limited to students who are seeking assistance on their own, separately from their parents.

Definitions

In determining whether and how the new eligibility restrictions apply to a student, the PHA will rely on the following definitions [FR Notice 4/10/06, FR Notice 9/21/16]

Dependent Child

In the context of the student eligibility restrictions, *dependent child* means a dependent child of a student enrolled in an institution of higher education. The dependent child must also meet the definition of *dependent* in 24 CFR 5.603, which states that the dependent must be a member of the assisted family, other than the head of household or spouse, who is under 18 years of age, or is a person with a disability, or is a full-time student. Foster children and foster adults are not considered dependents.

Independent Student

PHA Policy

OHA will consider a student “independent” from his or her parents and the parents’ income will not be considered when determining the student’s eligibility if the following four criteria are all met:

- The individual is of legal contract age under state law.
- The individual has established a household separate from his/her parents for at least one year prior to application for occupancy or the individual meets the U.S. Department of Education’s definition of independent student.

To be considered an *independent student* according to the Department of Education, a student must meet one or more of the following criteria:

- The individual is at least 24 years old by December 31 of the award year for which aid is sought
- The individual is an orphan, in foster care or a ward of the court or was an orphan, in foster care or a ward of the court at any time when the individual was 13 years of age or older.
- The individual is, or was immediately prior to attaining the age of majority, an emancipated minor, or legal guardianship as determined by a court of competent jurisdiction in the individual state of legal residence.
- The individual is a veteran of the U.S. Armed Forces or is currently serving on active duty in the Armed Forces for than training purposes.
- The individual a graduate or professional student
- The individual is married
- The individual has one or more legal dependents other than a spouse (for example, dependent children or an elderly dependent parent

- The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as an unaccompanied, at risk of homelessness and self-supporting by:
 - A local educational agency homeless liaison
 - The director of a program funded under subtitle B of title VI of the McKinney-Bento Homeless Assistance Act or a designee of the director.
 - A financial aid administrator
- The individual is a student for whom a financial aid administrator makes a documented determination of independence by reason of unusual circumstances.
- The individual was not claimed as a dependent by his/her parents pursuant to IRS regulations, as demonstrated on the parents' most recent tax forms.
- The individual provides a certification of the amount of financial assistance that will be provided by his/her parents. This certification must be signed by the individual providing the support and must be submitted even if no assistance is being provided.

If the PHA determines that an individual meets the definition of a *vulnerable youth*, such a determination is all that is necessary to determine that the person is an *independent student* for the purpose of using only the student's income for determining eligibility for assistance.

The PHA will verify that a student meets the above criteria in accordance with the policies in Section 7-II.E

Institution of Higher Education

The PHA will use the statutory definition under section 102 of the Higher Education Act of 1965 to determine whether a student is attending an *institution of higher education* (see Exhibit 3-2).

Parents

PHA Policy

For purposes of student eligibility restrictions, the definition of *parents* includes biological or adoptive parents, stepparents (as long as they are currently married to the biological or adoptive parent), and guardians (e.g., grandparents, aunt/uncle, godparents, etc).

Person with Disabilities

The PHA will use the statutory definition under section 3(b)(3)(E) of the 1937 Act to determine whether a student is a *person with disabilities* (see Exhibit 3-1)

Veteran

PHA Policy

A *veteran* is a person who served in the active military, naval, or air service and who was discharged or released from such service under conditions other than dishonorable.

Vulnerable Youth

PHA Policy

A *vulnerable youth* is individual who meets the U.S. Department of Education's definition of *independent student* in paragraphs (b), (c), or (h), as adopted in Section II of FR Notice 9/21/16:

- The individual is an orphan, in foster care, or a ward of the court, or was an orphan, in foster care, or ward of the court at any time when the individual was 13 years of age or older
- The individual is, or was immediately prior to attaining the age of majority, an emancipated minor or in legal guardianship as determined by a court of competent jurisdiction in the individual's state of legal residence
- The individual has been verified during the school year in which the application is submitted as either an unaccompanied youth who is a homeless child or youth, or as unaccompanied, at risk of homelessness, and self-supporting by:

A local educational agency homeless liaison

The director of a program funded under subtitle B of title IV of the McKinney-Vento Homeless Assistance Act or a designee of the director

A financial aid administrator

Determining Student Eligibility

If a student is applying for assistance on his/her own, apart from his/her parents, the PHA must determine whether the student is subject to the eligibility restrictions contained in 24 CFR 5.612. If the student is subject to those restrictions, the PHA must ensure that: (1) the student is individually eligible for the program, (2) either the student is independent from his/her parents or the student's parents are income eligible for the program, and (3) the "family" with which the student is applying is collectively eligible for the program.

PHA Policy

For any student who is subject to the 5.612 restrictions, the PHA will:

Follow its usual policies in determining whether the student individually and the student's "family" collectively are eligible for the program

Determine whether the student is independent from his/her parents in accordance with the definition of *independent student* in this section

Follow the policies below, if applicable, in determining whether the student's parents are income eligible for the program

If the PHA determines that the student, the student's parents (if applicable), or the student's "family" is not eligible, the PHA will send a notice of denial in accordance with the policies in Section 3-III.F, and the applicant family will have the right to request an informal review in accordance with the policies in Section 16-III.B.

Determining Parental Income Eligibility

PHA Policy

For any student who is subject to the 5.612 restrictions and who does not satisfy the definition of *independent student* in this section, the PHA will determine the income eligibility of the student's parents as follows:

If the student's parents are married and living together, the PHA will obtain a joint income declaration and certification of joint income from the parents.

If the student's parent is widowed or single, the PHA will obtain an income declaration and certification of income from that parent.

If the student's parents are divorced or separated, the PHA will obtain an income declaration and certification of income from each parent.

If the student has been living with one of his/her parents and has not had contact with or does not know where to contact his/her other parent, the PHA will require the student to submit a certification under penalty of perjury describing the circumstances and stating that the student does not receive financial assistance from the other parent. the PHA will then obtain an income declaration and certification of income from the parent with whom the student has been living or had contact.

In determining the income eligibility of the student's parents, the PHA will use the income limits for the jurisdiction in which the parents live.

3-II.F. EIV SYSTEM SEARCHES [EIV FAQs: EIV System Training 9/30/20; and Notice PIH 2023-27)]

Existing Tenant Search

Prior to admission to the program, the PHA must search for all household members using the EIV Existing Tenant Search module. The PHA must review the reports for any SSA matches involving another PHA or a multifamily entity and follow up on any issues identified. The PHA must provide the family with a copy of the Existing Tenant Search results if requested. At no time may any family member receive duplicative assistance.

If the tenant is a new admission to the PHA, and a match is identified at a multifamily property, the PHA must report the program admission date to the multifamily property and document the notification in the tenant file. The family must provide documentation of move-out from the assisted unit, as applicable.

PHA Policy

The PHA will contact the other PHA or owner identified in the report to confirm that the family has moved out of the unit and obtain documentation of current tenancy status, including a form HUD-50058 or 50059, as applicable, showing an end of participation. The PHA will only approve assistance contingent upon the move-out from the currently occupied assisted unit.

Debts Owed to PHAs and Terminations

All adult household members must sign the form HUD-52675 Debts Owed to Public Housing and Terminations. Prior to admission to the program, OHA must search for each adult family member in the Debts Owed to PHAs and Terminations module.

If a current or former tenant disputes the information in the module, the tenant should contact OHA or other PHA directly in writing to dispute the information and provide any documentation that supports the dispute. If OHA determines that the disputed information is incorrect, OHA will update or delete the record from EIV. Former tenants may dispute debt and termination information for a period of up to three years from the end of participation date in the program.

PHA Policy

The PHA will require each adult household member to sign the form HUD-52675 once at the eligibility determination. Any new members added to the household after admission will be required to sign the form HUD-52675 prior to being added to the household.

The PHA will search the Debts Owed to PHAs and Terminations module as part of the eligibility determination for new households and as part of the screening process for any household members added after the household is admitted to the program. If any information on debts or terminations is returned by the search, the PHA will determine if this information warrants a denial in accordance with the policies in Part III of this chapter.

~~Income and Income Validation Tool (IVT) Reports~~

~~For each new admission, OHA is required to review the EIV Income and IVT Reports to confirm and validate family reported income within 120 days of the IMS/PIC submission date of the new admission. OHA must print and maintain copies of the EIV Income and IVT reports in the tenant file~~

~~and resolve any discrepancies with the family within 60 days of the EIV Income or IVT report dates.~~

EIV Income Report

For each new admission, the PHA is required to review income information in EIV to confirm and validate family reported income within 120 days after the admission information is transmitted to HUD. The PHA must print and maintain copies of the reports in the tenant file and resolve any discrepancies with the family.

PART III: DENIAL OF ASSISTANCE

3-III.A. OVERVIEW

A family that does not meet the eligibility criteria discussed in Parts I and II, must be denied assistance. OHA may deny assistance for an applicant because of the family's action or failure to act as described in 24 CFR 982.552 or 982.553. In this section we will discuss other situations and circumstances in which denial of assistance is mandatory for the PHA, and those in which denial of assistance is optional for the PHA.

~~In addition, HUD authorizes OHA to deny assistance based on certain types of current or past behaviors of family members. OHA is authorized to obtain criminal conviction records from law enforcement agencies to screen applicants for admission to the HCV program. This authority assists OHA in complying with HUD requirements and OHA policies to deny assistance to applicants who are engaging in or have engaged in certain criminal activities. In order to obtain access to the records, OHA must require every applicant family to submit a consent form signed by each adult household member [24 CFR 5.903]. All household members age 18 or older will be subject to a criminal background check. OHA may deny assistance based on its review of the criminal background check.~~

~~In this section we will discuss other situations and circumstances in which denial of assistance is mandatory for OHA, and those in which denial of assistance is optional for OHA.~~

~~While the regulations state that the PHA must prohibit admission for certain types of criminal activity and give the PHA the option to deny for other types of previous criminal history, more recent HUD rules and OGC guidance must also be taken into consideration when determining whether a particular individual's criminal history merits denial of admission.~~

When considering any denial of admission, PHAs may not use arrest records as the basis for the denial. Further, HUD does not require the adoption of "One Strike" policies and reminds PHAs of their obligation to safeguard the due process rights of applicants and tenants [Notice PIH 2015-19].

HUD's Office of General Counsel issued a memo on April 4, 2016, regarding the application of Fair Housing Act standards to the use of criminal records. This memo states that OHA violates the Fair Housing Act when their policy or practice has an unjustified discriminatory effect, even when OHA had no intention to discriminate. Where a policy or practice that restricts admission based on criminal history has a disparate impact on a particular race, national origin, or other protected class, that policy or practice is in violation of the Fair Housing Act if it is not necessary to serve a substantial, legitimate, nondiscriminatory interest of the PHA, or if that interest could be served by another practice that has a less discriminatory effect [OGC Memo 4/4/16]. HUD codified this stance on disparate impact and discriminatory effects in a final rule dated March 31, 2023. In doing so, HUD also standardized its long-practiced three-step approach to assessing burdens of proof.

PHAs who impose blanket prohibitions on any person with any conviction record, no matter when the conviction occurred, what the underlying conduct entailed, or what the convicted person has done since then will be unable to show that such policy or practice is necessary to achieve a substantial, legitimate, nondiscriminatory interest. Even a PHA with a more tailored policy or practice that excludes individuals with only certain types of convictions must still prove that its policy is necessary. To do this, OHA must show that its policy accurately distinguishes between criminal conduct that indicates a demonstrable risk to resident safety and property and criminal conduct that does not.

Forms of Denial [24 CFR 982.552(a)(2); HCV GB, p. 5-35]

Denial of assistance includes any of the following:

- Not placing the family's name on the waiting list
- Denying or withdrawing a voucher
- Not approving a request for tenancy or refusing to enter into a HAP contract
- Refusing to process a request for or to provide assistance under portability procedures.

**Prohibited Reasons for Denial of Program Assistance
[24 CFR 982.202(b), 24 CFR 5.2005 (B)]**

HUD rules prohibit denial of assistance to the program based on any of the following criteria:

- Age, disability, race, color, religion, sex, national origin familial status, sexual orientation, gender identity, or marital status. (See Chapter 2 for additional information about fair housing and equal opportunity policies.)
- Where a family lives prior to admission to the program
- Where the family will live with assistance under the program. Although eligibility is not affected by where the family will live, there may be restrictions on the family's ability to move outside PHA's jurisdiction under portability (See Chapter 10)
- Whether members of the family are unwed parents, recipients of public assistance, or children born out of wedlock
- Whether the family includes children
- Whether a family decides to participate in a family self-sufficiency program
- Whether or not a qualified applicant is or has been a victim of domestic violence, dating violence sexual assault, stalking, or human trafficking if the applicant is otherwise qualified for assistance (See section 3-III.G.)

3-III.B. MANDATORY DENIAL OF ASSISTANCE [24 CFR 982.553(a) and 24 CFR 982.552(b)(6)]

HUD requires the PHA to deny assistance in the following cases:

- Any member of the household has been evicted from federally assisted housing in the last three years for drug-related criminal activity. HUD permits, but does not require, the PHA to admit an otherwise-eligible family if the household member has completed a PHA-approved drug rehabilitation program or the circumstances which led to eviction no longer exist (e.g., the person involved in the criminal activity no longer lives in the household).

PHA Policy

The PHA will admit an otherwise-eligible family who was evicted from federally assisted housing within the past three years for drug-related criminal activity if the PHA is able to verify that the household member who engaged in the criminal activity has completed a supervised drug rehabilitation program approved by the PHA, or the person who committed the crime is no longer living in the household.

- The PHA determines that any household member is currently engaged in the use of illegal drugs.

PHA Policy

Currently engaged in is defined as any use of illegal drugs during the previous three months.

- The PHA has reasonable cause to believe that any household member's current use or pattern of use of illegal drugs, or current abuse or pattern of abuse of alcohol, may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents.

PHA Policy

In determining reasonable cause, the PHA will consider all credible evidence, including but not limited to, any record of convictions, arrests, or evictions of household members related to the use of illegal drugs or the abuse of alcohol. A record or records of arrest will not be used as the sole basis of determining reasonable cause. The PHA will also consider evidence from treatment providers or community-based organizations providing services to household members.

PHA Policy

~~If any household member has even been convicted of drug-related criminal activity for the production or manufacturing of methamphetamine in any location, not just federally assisted housing, the family will be denied.~~

~~Any household member has ever been convicted of drug-related criminal activity for the production or manufacture of methamphetamine on the premises of federally assisted housing.~~

- Any household member is subject to a lifetime registration requirement under a state sex offender registration program.
- Any member of the family fails to sign and submit consent forms for obtaining information.
- The family does not meet the restrictions on net assets and real property ownership as required by 24 CFR 5.618.

Upon the PHA's HOTMA 102/104 compliance date, the following section on the asset limitation is added. The asset limitation does not apply until the PHA's HOTMA compliance date.

3-III.C. RESTRICTION ON ASSISTANCE BASED ON ASSETS [24 CFR 5.618]

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
- \$100,000 for 2024, \$103,200 for 2025

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, or stalking.
 - When a family asks for an exception because a family member is a victim of domestic violence, dating violence, sexual assault, or stalking, the PHA must comply with all the confidentiality requirements under VAWA. The PHA must accept a self-certification from the family member, and the restrictions on requesting documentation under VAWA apply.

A property is considered suitable for occupancy unless the family demonstrates that it:

- 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;

PHA Policy

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);

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 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.D. OTHER PERMITTED REASONS FOR DENIAL OF ASSISTANCE

HUD permits, but does not require the PHA to deny assistance for the reasons discussed in this section.

Criminal Activity [24 CFR 982.553]

HUD permits, but does not require, the PHA to deny assistance if the PHA determines that any household member is currently engaged in or has engaged in during a reasonable time before the family would receive assistance, certain types of criminal activity.

PHA Policy

~~OHA may deny assistance to an applicant if OHA determines that any member of the applicant's household has engaged in the following criminal activity:~~

The PHA will not deny assistance if the PHA determines that any household member is currently engaged in or has engaged in the following types of criminal activity:

- *Drug-related criminal activity*, defined by HUD as the illegal manufacture, sale, distribution, or use of a drug, or the possession of a drug with intent to manufacture, sell, distribute or use the drug [24 CFR 5.100].
- *Violent criminal activity*, defined by HUD as any criminal activity that has as one of its elements the use, attempted use, or threatened use of physical force substantial enough to cause, or be reasonably likely to cause, serious bodily injury or property damage [24 CFR 5.100].
- Criminal activity that may threaten the health, safety, or right to peaceful enjoyment of the premises by other residents or persons residing in the immediate vicinity.

Immediate vicinity means within a three-block radius of the premises.

If any household member is currently engaged in or has engaged in any of the following criminal activities, within the past three years, the family will be denied assistance.

- Criminal sexual conduct, including but not limited to sexual assault, incest, open and gross lewdness, or child abuse; or
- Criminal activity that may threaten the health or safety of property owners and management staff, and persons performing contract administration functions or other responsibilities on behalf of the PHA (including a PHA employee or an OHA contractor, subcontractor, or agent).

Evidence of such criminal activity includes, but is not limited to:

- Any conviction for drug-related or violent criminal activity within the past three years.
- Records of arrests for drug-related or violent criminal activity within the past three years, although a record or records of arrest will not be used as the sole basis for the denial or proof that the applicant engaged in disqualifying criminal activity.

In making its decision to deny assistance, the PHA will consider the factors discussed in Section 3-III.F and 3-III.G. Upon consideration of such factors, OHA may, on a case-by-case basis, decide not to deny assistance.

OHA's review of criminal background will consider crimes within the past five years but will take into account the age and severity of crimes. More serious crimes will have a longer look-back period and will be given greater weight. Less serious crimes will have a shorter look-back period and will be given less weight. OHA has established written Criminal Background Check Procedures that specify the look-back periods and weights accorded to specific crimes.

OHA's Criminal Background Check Procedures are provided to every applicant at the time they receive an application. OHA's Criminal Background Check Procedures are attached see Exhibit 3-3 at the end of this chapter.

Previous Behavior in Assisted Housing [24 CFR 982.552(c)]

HUD authorizes the PHA to deny assistance based on the family's previous behavior in assisted housing:

The PHA **will not** deny assistance to an otherwise eligible family because the family previously failed to meet its obligations under the Family Self-Sufficiency (FSS) program [24 CFR 982.552(c)]

PHA Policy

The PHA **will** deny assistance to an applicant family if:

- Any member of the family is withdrawn from the Section 8 wait list within the last 6 months.
- Any member of the family was terminated from the Section 8 program within the last 6 months.
- The family does not provide information that the PHA or HUD determines is necessary in the administration of the program.
- The family does not provide complete and true information to the PHA.
- Any family member has been evicted from federally assisted housing in the last three years.
- Any family member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program.
- The family owes rent or other amounts to any PHA in connection with Section 8 or other public housing assistance under the 1937 Act, unless the family repays the full amount of the debt prior to being selected from the waiting list.
- If the family has not reimbursed the PHA for any amounts the PHA paid to an owner under a HAP contract for rent, damages to the unit, or other amounts owed by the family under the lease, unless the family repays the full amount of the debt prior to being selected from the waiting list.

The family has breached the terms of a repayment agreement entered into with the PHA, unless the family repays the full amount of the debt covered in the repayment agreement prior to being selected from the waiting list.

When denying admission due to family debts as shown in HUD's EIV system, the PHA will provide the family with a copy of the EIV Debt Owed to PHA and Termination report.

If the family wishes to dispute the information in the report, the family must contact the PHA that entered the information in EIV in writing, explaining why EIV information is disputed. The family must also provide a copy of the letter and all applicable verification to the PHA to support the family's claim. The PHA will consider the information provided by the family prior to issuing a notice of denial.

- A family member has engaged in or threatened violent or abusive behavior toward PHA personnel.

Abusive or violent behavior includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

Threatening refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

In making its decision to deny assistance, the PHA will consider the factors discussed in Section 3-III.F and 3-III.G. Upon consideration of such factors, the PHA may, on a case-by-case basis, decide not to deny assistance.

3-III.E. SCREENING

Screening for Eligibility

The PHA is authorized to obtain criminal conviction records from law enforcement agencies to screen applicants for admission to the HCV program. This authority assists PHA in complying with HUD requirements and PHA policies to deny assistance to applicants who are engaging in or have engaged in certain criminal activities. In order to obtain access to the records, the PHA must require every applicant family to submit a consent form signed by each adult household member [24 CFR 5.903].

PHA Policy

The PHA will perform a criminal background check through local law enforcement for all household members aged 18 or older.

If the results of the criminal background check indicate that there may be past criminal activity, but the results are inconclusive, The PHA may deny assistance based on its review of the criminal background check. The PHA may also request a fingerprint card and information from the National Crime Information center (NCIC).

While a PHA has regulatory authority to use criminal conviction records for the purpose of applicant screening for admission, there is no corresponding authority to use these records to check for criminal and illegal drug activity by participants, and therefore, PHA's may not use records for this purpose.

PHAs are required to perform criminal background checks necessary to determine whether any household member is subject to a lifetime registration requirement under a state sex offender program in the state where the housing is located, as well as in any other state where a household member is known to have resided [24 CFR 982.553(a)(2)(i)].

PHA Policy

The PHA will use the Dru Sjodin National Sex Offender database to screen applicants for admission.

Additionally, PHAs must ask whether the applicant, or any member of the applicant's household, is subject to a lifetime registered sex offender registration requirement in any state [Notice PIH 2012-28].

If the PHA proposes to deny assistance based on a criminal record or on lifetime sex offender registration information, the PHA must notify the household of the proposed action and must provide the subject of the record and the applicant a copy of the record and an opportunity to dispute the accuracy and relevance of the information prior to a denial of admission. [24 CFR 5.903(f) and 5.905(d)].

Screening for Suitability as a Tenant [24 CFR 982.307]

The PHA has no liability or responsibility to the owner for the family's behavior or suitability for tenancy. The PHA has the authority to conduct additional screening to determine whether an applicant is likely to be a suitable tenant.

PHA Policy

The PHA will not conduct additional screening to determine an applicant family's suitability for tenancy.

The owner is responsible for screening and selection of the family to occupy the owner's unit. The PHA must inform the owner that screening and selection for tenancy is the responsibility of the owner. An owner may consider a family's history with respect to factors such as: payment of rent and utilities, caring for a unit and premises, respecting the rights of other residents to the peaceful enjoyment of their housing, criminal activity that is a threat to the health, safety or property of others, and compliance with other essential conditions of tenancy.

HUD requires the PHA to provide prospective owners with the family's current and prior address (as shown in PHA records) and the name and address (if known) of the owner at the family's current and prior addresses. HUD permits the PHA to provide owners with additional information, as long as families are notified that the information will be provided, and the same type of information is provided to all owners.

The PHA may not disclose to the owner any confidential information provided to the PHA by the family in response to a PHA request for documentation of domestic violence, dating violence, sexual assault, stalking, or human trafficking, except at the written request or with the written consent of the individual providing the documentation [see 24 CFR 5.2007(a)(4)].

PHA Policy

The PHA will inform owners of their responsibility to screen prospective tenants and will provide owners with the required known name and address information, at the time of the initial inspection or before. The PHA will not provide any additional information to the owner, such as tenancy history or criminal history, etc.

3-III.F. CRITERIA FOR DECIDING TO DENY ASSISTANCE

Evidence [24 CFR 982.553(c)]

PHA Policy

The PHA will use the concept of the preponderance of the evidence as the standard for making all admission decisions.

Preponderance of the evidence is defined as evidence which is of greater weight or more convincing than the evidence which is offered in opposition to it; that is, evidence which as a whole shows that the fact sought to be proved is more probable than not. Preponderance of the evidence is not determined by the number of witnesses or documents, but by the greater weight of all evidence.

Consideration of Circumstances [24 CFR 982.552(c)(2)]

HUD authorizes OHA to consider all relevant circumstances when deciding whether to deny assistance based on a family's past history except in the situations for which denial of assistance is mandatory (see Section 3-III.B).

PHA Policy

~~In determining whether to deny or terminate assistance, OHA will consider all relevant circumstances such as:~~

The PHA will consider the following facts and circumstances prior to making its decision.

- The seriousness of the case, especially with respect to how it would affect other residents' safety or property
- The effects that denial of assistance may have on other members of the family who were not involved in the action or failure to act
- The extent of participation or culpability of individual family members, including whether the culpable family member is a minor or a person with disabilities, or (as discussed further in section 3-III.H) a victim of domestic violence, dating violence, sexual assault, stalking or human trafficking.
- The length of time since the violation occurred, including the age of the individual at the time of the conduct, as well as the family's recent history and the likelihood of favorable conduct in the future.
- In the case of drug or alcohol abuse, whether the culpable household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program or has otherwise been rehabilitated successfully. OHA will require the applicant to submit evidence of the household member's current participation in or successful completion of a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.

While a record or records of arrest will not be used as the sole basis for denial, an arrest may trigger an investigation to determine whether the applicant 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. The PHA may also consider:

- 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

Evidence of criminal conduct will be considered if it indicates a demonstrable risk to safety and/or property

In the case of drug or alcohol abuse, whether the culpable household member is participating in or has successfully completed a supervised drug or alcohol rehabilitation program or has otherwise been rehabilitated successfully

The PHA will require the applicant to submit evidence of the household member's current participation in or successful completion of a supervised drug or alcohol rehabilitation program, or evidence of otherwise having been rehabilitated successfully.

Removal of a Family Member's Name from the Application [24 CFR 982.552(c)(2)(ii)]

Should the PHA's screening process reveal that an applicant's household includes an individual subject to state lifetime registered sex offender registration; the PHA must offer the family the opportunity to remove the ineligible family member from the household. If the family is unwilling to remove that individual from the household, the PHA must deny admission to the family [Notice PIH 2012-28].

For other criminal activity, the PHA may, at its discretion, permit the family to exclude the culpable family members as a condition of eligibility. [24 CFR 982.552(c)(2)(ii)].

PHA Policy

As a condition of receiving assistance, a family may agree to remove the culpable family member from the applications. In such instances, the head of household must certify that the family member will not be permitted to visit, stay as a guest, or reside in the assisted unit.

After admission to the program, the family must present evidence of the former family member's current address upon PHA request.

The application will be denied if the person to be removed is the spouse of the head of household.

The family must provide documentation satisfactory to the PHA demonstrating that the family member does not reside with the assisted family.

Reasonable Accommodation [24 CFR 982.552(c)(2)(iv) & 24 CFR Part 8]

If the family includes a person with disabilities, the PHA's decision concerning denial of admission is subject to consideration of reasonable accommodation in accordance with 24 CFR Part 8.

PHA Policy

~~OHA will determine whether alternative measures are appropriate as a reasonable accommodation.~~

If a family indicates that the behavior of a family member with a disability is the reason for the proposed denial of assistance, upon the family's request, the PHA will determine whether the behavior is related to the stated disability. If so, upon the family's request, the PHA will determine whether admitting the family as a reasonable accommodation is appropriate. The PHA will only consider accommodations that can reasonably be expected to address the behavior that is the basis of the proposed denial of assistance. See Chapter 2 for a discussion of reasonable accommodation.

3-III.F. NOTICE OF ELIGIBILITY OR DENIAL [24 CFR 982.554(a)]

If the family is eligible for assistance, the PHA will notify the family in writing and schedule an applicant ~~a tenant~~ briefing, as discussed in Chapter 5.

If the PHA determines that a family is not eligible for the program for any reason, the family must be notified promptly. The notice must describe: (1) the reasons for which assistance has been denied, (2) the family's right to an informal review, and (3) the process for obtaining the informal review [24 CFR 982.554 (a)]. See Chapter 16, for informal policies and procedures.

PHA Policy

The family will be notified of a decision to deny assistance in writing within 10 business days of the determination.

~~OHA will provide written notice within 10 business days of the determination that includes:~~

- ~~• The reasons for which assistance has been denied.~~
- ~~• The family's right to an informal review, and the process for obtaining the informal review [24 CFR 982.554 (a)]. See Chapter 16, for informal review policies and procedures.~~
- ~~• HUD's VAWA forms: Notice of Occupancy Rights (HUD form 5380) and the VAWA self-certification form (HUD form 5382).~~

~~If the PHA uses a criminal record or sex offender registration information obtained under 24CFR 5, Subpart J, as the basis of a denial, a copy of the record must precede the notice to deny, with an opportunity for the applicant to dispute the accuracy and relevance of the information before the PHA can move to deny the application. In addition, a copy of the record must be provided to the subject of the record [24 CFR 5.903(f) and 5.905(d)]. The PHA must give the family an opportunity to dispute the accuracy and relevance of that record, in the informal review process in accordance with program requirements. [24 CFR 982.553(d).~~

PHA Policy

~~If based on a criminal record or sex offender registration information, an applicant family appears to be ineligible, the PHA will notify the family in writing of the proposed denial and provide a copy of the record to the applicant and to the subject of the record. The family will be given 10 business days to dispute the accuracy and relevance of the information. If the family does not contact the PHA to dispute the information within the 10-day period, the PHA will proceed with issuing the notice of denial of admission. A family that does not exercise their right to dispute the accuracy of the information prior to issuance of the official denial letter will still be given the opportunity to do so as a part of the informal review process.~~

Notice requirements related to denying assistance to noncitizens are contained in Section 3-II.B.

Notice policies related to denying admission to applicants who may be victims of domestic violence, dating violence, sexual assault, stalking or human trafficking are contained in Section 3-III.H.

3-III.G. PROHIBITION AGAINST DENIAL OF ASSISTANCE TO VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, STALKING AND HUMAN TRAFFICKING

The Violence against Women Act ~~of 2013~~ (VAWA) and the HUD regulation at 24 CFR 5.2005(b) prohibit denial of admission to the HCV program “on the basis that the applicant is or has been a victim of domestic violence, dating violence, sexual assault or stalking, if the applicant otherwise qualifies for assistance or admission.”

~~Section 16-IX of this plan contains OHA’s VAWA requirements and policies.~~

- Although the VAWA 2022 statute does not specifically include human trafficking in the list of victims protected under VAWA, in 2022, HUD began including human trafficking as part of the list of victims protected under VAWA (as seen in Notices PIH 2022-06, PIH 2022-22, and PIH 2022-24). In the absence of a final rule implementing VAWA 2022 and to mirror HUD’s recent usage, this policy includes human trafficking in addition to domestic violence, dating violence, sexual assault and stalking anywhere such a list appears.

Definitions of key terms used in VAWA are provided in section 16-IX of this plan, where general VAWA requirements and policies pertaining to notification, documentation, and confidentiality are also located.

Notification

VAWA ~~2013~~ expanded notification requirements to include the obligation for PHAs provide applicants who are denied assistance with a VAWA Notice of Occupancy Rights (HUD form 5380) and the domestic violence certification form (HUD 5382) at the time the applicant is denied.

PHA Policy

The PHA acknowledges that a victim of domestic violence, dating violence, sexual assault, stalking or human trafficking may have an unfavorable history (e.g., a poor credit history, poor rental history, a record of previous damage to an apartment, a prior arrest record) due to adverse factors that would warrant denial under the PHA policies.

While the PHA is not required to identify whether adverse factors that resulted in the applicant’s denial are a result of domestic violence, dating violence, sexual assault, stalking, or human trafficking, the applicant may inform the PHA that their status as a victim is directly related to the grounds for the denial. The PHA will request that the applicant provide enough information to allow the PHA to make an objectively reasonable determination, based on all circumstances, whether the adverse factor is a direct result of their status as a victim.

The PHA will include in its notice of denial the VAWA information described in section 16-IX.C of this plan as well as including a copy of the form HUD-5382. The PHA will request in writing that an applicant wishing to claim protection under VAWA notify the OHA within 14 business days.

Documentation

Victim Documentation [24 CFR 5.2007]

PHA Policy

If an applicant claims the protection against denial of assistance that VAWA provides to victims of domestic violence, dating violence, sexual assault, stalking or human trafficking, OHA will request in writing that the applicant provide documentation supporting the claim in accordance with section 16-IX.D of this plan.

Perpetrator Documentation

PHA Policy

If the perpetrator of the abuse is a member of the applicant family, the applicant must provide additional documentation consisting of one of the following:

A signed statement (1) requesting that the perpetrator be removed from the application and (2) certifying that the perpetrator will not be permitted to visit or to stay as a guest in the assisted unit

Documentation that the perpetrator has successfully completed, or is successfully undergoing, rehabilitation or treatment. The documentation must be signed by an employee or agent of a domestic violence service provider or by a medical or other knowledgeable professional from whom the perpetrator has sought or is receiving assistance in addressing the abuse. The signer must attest under penalty of perjury to his or her belief that the rehabilitation was successfully completed or is progressing successfully. The victim and perpetrator must also sign or attest to the documentation.

Time Frame for Submitting Documentation

The applicant must submit the required documentation with her or his request for an informal review (see section 16-III.D) or must request an extension in writing at that time.

PHA Confidentiality Requirements [24 CFR 5.2007(a)(1)(v)]

All information provided to the PHA regarding domestic violence, dating violence, sexual assault or stalking, including the fact that an individual is a victim of such violence or stalking, must be retained in confidence and may neither be entered into any shared database nor provided to any related entity, except to the extent that the disclosure (a) is requested or consented to by the individual in writing, (b) is required for use in an eviction proceeding, or (c) is otherwise required by applicable law.

If disclosure is required for use in an eviction proceeding or is otherwise required by applicable law, the PHA will inform the victim before disclosure occurs so that safety risks can be identified and addressed.

EXHIBIT 3-1: DETAILED DEFINITIONS RELATED TO DISABILITIES

Person with Disabilities [24 CFR 5.403]

The term *person with disabilities* means a person who has any of the following types of conditions:

- Has a disability, as defined in 42 U.S.C. Section 423(d)(1)(A), which reads:
Inability to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or which has lasted or can be expected to last for a continuous period of not less than 12 months; *or*
In the case of an individual who has attained the age of 55 and is blind (within the meaning of “blindness” as defined in section 416(i)(1) of this title), inability by reason of such blindness to engage in substantial gainful activity, requiring skills or ability comparable to those of any gainful activity in which he has previously engaged with some regularity and over a substantial period of time.
- Has a developmental disability as defined in the Developmental Disabilities Assistance and Bill of Rights Act of 2000 [42 U.S.C.15002(8)], which defines developmental disability in functional terms as follows:

(A) In General

The term “developmental disability” means a severe, chronic disability of an individual that:

- (i) is attributable to a mental or physical impairment or combination of mental and physical impairments;
- (ii) is manifested before the individual attains age 22;
- (iii) is likely to continue indefinitely;
- (iv) results in substantial functional limitations in 3 or more of the following areas of major life activity: (I) Self-care, (II) Receptive and expressive language, (III) Learning, (IV) Mobility, (V) Self-direction, (VI) Capacity for independent living, (VII) Economic self-sufficiency; and
- (v) reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

(B) Infants and Young Children

An individual from birth to age 9, inclusive, who has a substantial developmental delay or specific congenital or acquired condition, may be considered to have a developmental disability without meeting 3 or more of the criteria described in clauses (i) through (v) of subparagraph (A) if the individual, without services and supports, has a high probability of meeting those criteria later in life.

Has a physical, mental, or emotional impairment that is expected to be of long-continued and indefinite duration; substantially impedes his or her ability to live independently, and is of such a nature that the ability to live independently could be improved by more suitable housing conditions.

- People with the acquired immunodeficiency syndrome (AIDS) or any conditions arising from the etiologic agent for AIDS are not excluded from this definition.
- A person whose disability is based solely on any drug or alcohol dependence does not qualify as a person with disabilities for the purposes of this program.
- For purposes of reasonable accommodation and program accessibility for persons with disabilities, the term person with disabilities refers to an individual with handicaps.

Individual with Handicaps [24 CFR 8.3]

Individual with handicaps means any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such an impairment; or is regarded as having such an impairment. The term does not include any individual who is an alcoholic or drug abuser whose current use of alcohol or drugs prevents the individual from participating in the program or activity in question, or whose participation, by reason of such current alcohol or drug abuse, would constitute a direct threat to property or the safety of others. As used in this definition, the phrase:

(1) Physical or mental impairment includes:

- (a) Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive; digestive; genito-urinary; hemic and lymphatic; skin; and endocrine; or
- (b) Any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. The term physical or mental impairment includes, but is not limited to, such diseases and conditions as orthopedic, visual, speech and hearing impairments, cerebral palsy, autism, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, drug addiction and alcoholism.

(2) *Major life activities* means functions such as caring for one's self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working.

(3) Has a record of such an impairment means has a history of, or has been misclassified as having, a mental or physical impairment that substantially limits one or more major life activities.

(4) *Is regarded as having an impairment* means:

- (a) Has a physical or mental impairment that does not substantially limit one or more major life activities but that is treated by a recipient as constituting such a limitation;
- (b) Has a physical or mental impairment that substantially limits one or more major life activities only as a result of the attitudes of others toward such impairment; or
- (c) Has none of the impairments defined in paragraph (1) of this section but is treated by a recipient as having such an impairment.

EXHIBIT 3-2: DEFINITION OF INSTITUTION OF HIGHER EDUCATION [20 U.S.C. 1001 and 1002]

Eligibility of Students for Assisted Housing Under Section 8 of the U.S. Housing Act of 1937; Supplementary Guidance; Notice [Federal Register, April 10, 2006]

Institution of Higher Education shall have the meaning given this term in the Higher Education Act of 1965 in 20 U.S.C. 1001 and 1002.

Definition of “Institution of Higher Education” From 20 U.S.C. 1001

- (a) Institution of higher education. For purposes of this chapter, other than subchapter IV and part C of subchapter I of chapter 34 of Title 42, the term “institution of higher education” means an educational institution in any State that
 - (1) Admits as regular students only persons having a certificate of graduation from a school providing secondary education, or the recognized equivalent of such a certificate;
 - (2) Is legally authorized within such State to provide a program of education beyond secondary education;
 - (3) Provides an educational program for which the institution awards a bachelor’s degree or provides not less than a 2-year program that is acceptable for full credit toward such a degree;
 - (4) Is a public or other nonprofit institution; and
 - (5) Is accredited by a nationally recognized accrediting agency or association, or if not so accredited, is an institution that has been granted pre-accreditation status by such an agency or association that has been recognized by the Secretary for the granting of pre-accreditation status, and the Secretary has determined that there is satisfactory assurance that the institution will meet the accreditation standards of such an agency or association within a reasonable time.
- (b) Additional institutions included. For purposes of this chapter, other than subchapter IV and part C of subchapter I of chapter 34 of Title 42, the term “institution of higher education” also includes—
 - (1) Any school that provides not less than a 1-year program of training to prepare students for gainful employment in a recognized occupation and that meets the provision of paragraphs (1), (2), (4), and (5) of subsection (a) of this section; and
 - (2) A public or nonprofit private educational institution in any State that, in lieu of the requirement in subsection (a)(1) of this section, admits as regular students persons who are beyond the age of compulsory school attendance in the State in which the institution is located.
- (c) List of accrediting agencies. For purposes of this section and section 1002 of this title, the Secretary shall publish a list of nationally recognized accrediting agencies or associations that the Secretary determines, pursuant to subpart 2 of part G of subchapter IV of this chapter, to be reliable authority as to the quality of the education or training offered.

Definition of “Institution of Higher Education” From 20 U.S.C. 1002

- (a) Definition of institution of higher education for purposes of student assistance programs
 - (1) Inclusion of additional institutions. Subject to paragraphs (2) through (4) of this subsection, the term “institution of higher education” for purposes of subchapter IV of

this chapter and part C of subchapter I of chapter 34 of title 42 includes, in addition to the institutions covered by the definition in section 1001 of this title—

- (A) A proprietary institution of higher education (as defined in subsection (b) of this section);
- (B) A postsecondary vocational institution (as defined in subsection (c) of this section); and
- (C) Only for the purposes of part B of subchapter IV of this chapter, an institution outside the United States that is comparable to an institution of higher education as defined in section 1001 of this title and that has been approved by the Secretary for the purpose of part B of subchapter IV of this chapter.

(2) Institutions outside the United States

(A) In general. For the purpose of qualifying as an institution under paragraph (1)(C), the Secretary shall establish criteria by regulation for the approval of institutions outside the United States and for the determination that such institutions are comparable to an institution of higher education as defined in section 1001 of this title (except that a graduate medical school, or a veterinary school, located outside the United States shall not be required to meet the requirements of section 1001 (a)(4) of this title). Such criteria shall include a requirement that a student attending such school outside the United States is ineligible for loans made, insured, or guaranteed under part B of subchapter IV of this chapter unless—

(i) In the case of a graduate medical school located outside the United States—

(I)(aa) At least 60 percent of those enrolled in, and at least 60 percent of the graduates of, the graduate medical school outside the United States were not persons described in section 1091(a)(5) of this title in the year preceding the year for which a student is seeking a loan under part B of subchapter IV of this chapter; and

(bb) At least 60 percent of the individuals who were students or graduates of the graduate medical school outside the United States or Canada (both nationals of the United States and others) taking the examinations administered by the Educational Commission for Foreign Medical Graduates received a passing score in the year preceding the year for which a student is seeking a loan under part B of subchapter IV of this chapter; or

(II) The institution has a clinical training program that was approved by a State as of January 1, 1992; or

(ii) In the case of a veterinary school located outside the United States that does not meet the requirements of section 1001(a)(4) of this title, the institution's students complete their clinical training at an approved veterinary school located in the United States.

(B) Advisory panel

(i) In general. For the purpose of qualifying as an institution under paragraph (1)(C) of this subsection, the Secretary shall establish an advisory panel of medical experts that shall—

(I) Evaluate the standards of accreditation applied to applicant foreign medical schools; and

- (II) Determine the comparability of those standards to standards for accreditation applied to United States medical schools.
 - (ii) Special rule if the accreditation standards described in clause (i) are determined not to be comparable, the foreign medical school shall be required to meet the requirements of section 1001 of this title.
 - (C) Failure to release information. The failure of an institution outside the United States to provide, release, or authorize release to the Secretary of such information as may be required by subparagraph (A) shall render such institution ineligible for the purpose of part B of subchapter IV of this chapter.
 - (D) Special rule. If, pursuant to this paragraph, an institution loses eligibility to participate in the programs under subchapter IV of this chapter and part C of subchapter I of chapter 34 of title 42, then a student enrolled at such institution may, notwithstanding such loss of eligibility, continue to be eligible to receive a loan under part B while attending such institution for the academic year succeeding the academic year in which such loss of eligibility occurred.
- (3) Limitations based on course of study or enrollment. An institution shall not be considered to meet the definition of an institution of higher education in paragraph (1) if such institution—
- (A) Offers more than 50 percent of such institution's courses by correspondence, unless the institution is an institution that meets the definition in section 2471 (4)(C) of this title;
 - (B) Enrolls 50 percent or more of the institution's students in correspondence courses, unless the institution is an institution that meets the definition in such section, except that the Secretary, at the request of such institution, may waive the applicability of this subparagraph to such institution for good cause, as determined by the Secretary in the case of an institution of higher education that provides a 2-or 4-year program of instruction (or both) for which the institution awards an associate or baccalaureate degree, respectively;
 - (C) Has a student enrollment in which more than 25 percent of the students are incarcerated, except that the Secretary may waive the limitation contained in this subparagraph for a nonprofit institution that provides a 2-or 4-year program of instruction (or both) for which the institution awards a bachelor's degree, or an associate's degree or a postsecondary diploma, respectively; or
 - (D) Has a student enrollment in which more than 50 percent of the students do not have a secondary school diploma or its recognized equivalent, and does not provide a 2-or 4-year program of instruction (or both) for which the institution awards a bachelor's degree or an associate's degree, respectively, except that the Secretary may waive the limitation contained in this subparagraph if a nonprofit institution demonstrates to the satisfaction of the Secretary that the institution exceeds such limitation because the institution serves, through contracts with Federal, State, or local government agencies, significant numbers of students who do not have a secondary school diploma or its recognized equivalent.
- (4) Limitations based on management. An institution shall not be considered to meet the definition of an institution of higher education in paragraph (1) if—
- (A) The institution, or an affiliate of the institution that has the power, by contract or ownership interest, to direct or cause the direction of the management or policies of

- the institution, has filed for bankruptcy, except that this paragraph shall not apply to a nonprofit institution, the primary function of which is to provide health care educational services (or an affiliate of such an institution that has the power, by contract or ownership interest, to direct or cause the direction of the institution's management or policies) that files for bankruptcy under chapter 11 of title 11 between July 1, 1998, and December 1, 1998; or
- (B) The institution, the institution's owner, or the institution's chief executive officer has been convicted of, or has pled nolo contendere or guilty to, a crime involving the acquisition, use, or expenditure of funds under subchapter IV of this chapter and part C of subchapter I of chapter 34 of title 42, or has been judicially determined to have committed fraud involving funds under subchapter IV of this chapter and part C of subchapter I of chapter 34 of title 42.
- (5) Certification. The Secretary shall certify an institution's qualification as an institution of higher education in accordance with the requirements of subpart 3 of part G of subchapter IV of this chapter.
- (6) Loss of eligibility. An institution of higher education shall not be considered to meet the definition of an institution of higher education in paragraph (1) if such institution is removed from eligibility for funds under subchapter IV of this chapter and part C of subchapter I of chapter 34 of title 42 as a result of an action pursuant to part G of subchapter IV of this chapter.
- (b) Proprietary institution of higher education
- (1) Principal criteria. For the purpose of this section, the term "proprietary institution of higher education" means a school that—
- (A) Provides an eligible program of training to prepare students for gainful employment in a recognized occupation;
- (B) Meets the requirements of paragraphs (1) and (2) of section 1001 (a) of this title;
- (C) Does not meet the requirement of paragraph (4) of section 1001 (a) of this title;
- (D) Is accredited by a nationally recognized accrediting agency or association recognized by the Secretary pursuant to part G of subchapter IV of this chapter;
- (E) Has been in existence for at least 2 years; and
- (F) Has at least 10 percent of the school's revenues from sources that are not derived from funds provided under subchapter IV of this chapter and part C of subchapter I of chapter 34 of title 42, as determined in accordance with regulations prescribed by the Secretary.
- (2) Additional institutions. The term "proprietary institution of higher education" also includes a proprietary educational institution in any State that, in lieu of the requirement in paragraph (1) of section 1001 (a) of this title, admits as regular students persons who are beyond the age of compulsory school attendance in the State in which the institution is located.
- (c) Postsecondary vocational institution.
- (1) Principal criteria. For the purpose of this section, the term "postsecondary vocational institution" means a school that—
- (A) Provides an eligible program of training to prepare students for gainful employment in a recognized occupation;

- (B) Meets the requirements of paragraphs (1), (2), (4), and (5) of section 1001 (a) of this title; and
 - (C) Has been in existence for at least 2 years.
- (2) Additional institutions. The term “postsecondary vocational institution” also includes an educational institution in any State that, in lieu of the requirement in paragraph (1) of section 1001 (a) of this title, admits as regular student’s, persons who are beyond the age of compulsory school attendance in the State in which the institution is located.

Chapter 4

APPLICATIONS, WAITING LIST AND TENANT SELECTION

INTRODUCTION

When a family wishes to receive assistance under the HCV program, the family must submit an application that provides the PHA with the information needed to determine the family's eligibility. HUD requires the PHA to place all families that apply for assistance on a waiting list. When HCV assistance becomes available, the PHA must select families from the waiting list in accordance with HUD requirements and PHA policies as stated in the administrative plan and the annual plan.

The PHA is required to adopt clear policies and procedures for accepting applications, placing families on the waiting list, and selecting families from the waiting list, and must follow these policies and procedures consistently. The actual order in which families are selected from the waiting list can be affected if a family has certain characteristics designated by HUD or the PHA that justify their selection. Examples of this are the selection of families for income targeting and the selection of families that qualify for targeted funding.

HUD regulations require that all families have an equal opportunity to apply for and receive housing assistance, and that the PHA affirmatively further fair housing goals in the administration of the program [24 CFR 982.53, HCV GB p. 4-1]. Adherence to the selection policies described in this chapter ensures that the PHA will be in compliance with all relevant fair housing requirements, as described in Chapter 2.

This chapter describes HUD and PHA policies for taking applications, managing the waiting list and selecting families for HCV assistance. The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan. The policies outlined in this chapter are organized into three sections, as follows:

Part I: The Application Process. This part provides an overview of the application process, and discusses how applicants can obtain and submit applications. It also specifies how the PHA will handle the applications it receives.

Part II: Managing the Waiting List. This part presents the policies that govern how the PHA's waiting list is structured, when it is opened and closed, and how the public is notified of the opportunity to apply for assistance. It also discusses the process OHA will use to keep the waiting list current.

Part III: Selection for HCV Assistance. This part describes the policies that guide the PHA in selecting families for HCV assistance as such assistance becomes available. It also specifies how in-person interviews will be used to ensure that OHA has the information needed to make a final eligibility determination.

PART I: THE APPLICATION PROCESS

4-I.A. OVERVIEW

This part describes the PHA policies for making applications available, accepting applications making preliminary determinations of eligibility, and the placement of applicants on the waiting list. This part also describes the PHA's obligation to ensure the accessibility of the application process to elderly persons, people with disabilities, and people with limited English proficiency (LEP).

4-I.B. APPLYING FOR ASSISTANCE [HCV GB, pp. 4-11 – 4-16, Notice PIH 2009-36]

Any family that wishes to receive HCV assistance must apply for admission to the program. HUD permits the PHA to determine the format and content of HCV applications, as well how such applications will be made available to interested families and how applications will be accepted by the PHA. The PHA must include Form HUD-92006, Supplement to Application for Federally Assisted Housing, as part of the PHA's application.

PHA Policy

Depending upon the length of time that applicants may need to wait to receive assistance, the PHA may use a one-or two-step application process.

A one-step process will be used when it is expected that a family will be selected from the waiting within 60 days of the date of application. At application, the family must provide all of the information necessary to establish family eligibility and level of assistance.

A two-step process will be used when it is expected that a family will not be selected from the waiting list for at least 90 days from the date of application. Under the two-step application process, the PHA initially will require families to provide only the information needed to make an initial assessment of the family's eligibility and to determine the family's placement on the waiting list. The family will be required to provide all of the information necessary to establish family eligibility and level of assistance when the family is selected from the waiting list.

- ~~1. — The application will be a permanent file.~~
- ~~2. — All applicants in the pool will be maintained in order by preference and then by date and time. For short term wait list openings, OHA may instead use random selection to select applications and to assign wait list positions.~~
- ~~3. — All applicants must meet "Very Low Income" eligibility requirements as established by HUD. Any exceptions to these requirements, other than those outlined in Chapter 2, "Eligibility for Admission," must have been approved previously by the HUD Field Office.~~

Completed applications must be returned to the PHA by mail, email, by fax, or submitted in person during normal business hours. Applications must be complete in order to be accepted by the PHA for processing. If an application is incomplete, the PHA will notify the family of the additional information required.

4-I.C. ACCESSIBILITY OF THE APPLICATION PROCESS

Elderly and Disabled Populations [24 CFR 8 and HCV GB, pp. 4-11 – 4-13]

The PHA must take steps to ensure that the application process is accessible to those people who might have difficulty complying with the normal, standard PHA application process. This could include people with disabilities, certain elderly individuals, as well as persons with limited English proficiency (LEP). The PHA must provide reasonable accommodation to the needs of individuals with disabilities. The application-taking facility and the application process must be fully accessible, or the PHA must provide an alternate approach that provides full access to the application process. Chapter 2 provides a full discussion of the PHA's policies related to providing reasonable accommodations for people with disabilities.

Limited English Proficiency

PHAs are required to take reasonable steps to ensure equal access to their programs and activities by persons with limited English proficiency [24 CFR 1]. Chapter 2 provides a full discussion on the PHA's policies related to ensuring access to people with limited English proficiency (LEP).

4-I.D. PLACEMENT ON THE WAITING LIST

The PHA must review each complete application received and make a preliminary assessment of the family's eligibility. The PHA must accept applications from families for whom the list is open unless there is good cause for not accepting the application (such as denial of assistance) for the grounds stated in the regulations [24 CFR 982.206(b)(2)]. Where the family is determined to be ineligible, the PHA must notify the family in writing [24 CFR 982.201(f)]. Where the family is not determined to be ineligible, the family will be placed on a waiting list of applicants.

No applicant has a right or entitlement to be listed on the waiting list, or to any particular position on the waiting list [24 CFR 982.202(c)].

Ineligible for Placement on the Waiting List

PHA Policy

If the PHA can determine from the information provided that a family is ineligible, the family will not be placed on the waiting list. Where a family is determined to be ineligible, the PHA will send written notification of the ineligibility determination within 10 business days of receiving a complete application. The notice will specify the reasons for ineligibility and will inform the family of its right to request an informal review and explain the process for doing so (see Chapter 16).

Eligible for Placement on the Waiting List

PHA Policy

The PHA will send written and email notification of the preliminary eligibility determination within 10 business days of receiving a complete application.

Placement on the waiting list does not indicate that the family is, in fact, eligible for assistance. A final determination of eligibility will be made when the family is selected from the waiting list.

~~Applicants will be placed on the waiting list according to the preferences for which the family is qualified and then by the date and time of their complete application. For short term wait list openings, OHA may instead use random selection to select applications and to assign wait list position.~~

Applicants will be placed on the waiting list using a lottery system. Once each application has been randomly assigned a number, the applications will be placed on the waiting list in order of the assigned numbers and according to the PHA preference(s).

PART II: MANAGING THE WAITING LIST

4-II.A. OVERVIEW

The PHA must have policies regarding various aspects of organizing and managing the waiting list of applicant families. This includes opening the list to new applicants, closing the list to new applicants, notifying the public of waiting list openings and closings, updating waiting list information, purging the list of families that are no longer interested in or eligible for assistance, as well as conducting outreach to ensure a sufficient number of applicants.

In addition, HUD imposes requirements on how a PHA may structure its waiting list and how families must be treated if they apply for assistance from a PHA that administers more than one assisted housing program.

4-II.B. ORGANIZATION OF THE WAITING LIST [24 CFR 982.204 and 205]

The PHA's HCV waiting list must be organized in such a manner to allow the PHA to accurately identify and select families for assistance in the proper order, according to the admissions policies described in this plan.

The waiting list must contain the following information for each applicant listed:

- Applicant name;
- Family unit size;
- Date and time of application;
- Qualification for any local preference;
- Racial or ethnic designation of the head of household.

HUD requires the PHA to maintain a single waiting list for the HCV program unless it serves more than one county or municipality. Such PHAs are permitted, but not required, to maintain a separate waiting list for each county or municipality served.

PHA Policy

The PHA will maintain a single waiting list for the HCV program.

HUD directs that a family that applies for assistance from the HCV program must be offered the opportunity to be placed on the waiting list for any public housing, project-based voucher or moderate rehabilitation program the PHA operates if 1) the other programs' waiting lists are open, and 2) the family is qualified for the other programs.

HUD permits, but does not require, that PHAs maintain a single merged waiting list for their public housing, Section 8, and other subsidized housing programs.

A family's decision to apply for, receive, or refuse other housing assistance must not affect the family's placement on the HCV waiting list, or any preferences for which the family may qualify.

PHA Policy

The PHA will not merge the HCV waiting list with the waiting list for any other program the PHA operates.

4-II.C. OPENING AND CLOSING THE WAITING LIST [24 CFR 982.206]

Closing the Waiting List

A PHA is permitted to close the waiting list if it has an adequate pool of families to use its available HCV assistance. Alternatively, the PHA may elect to continue to accept applications only from certain categories of families that meet particular preferences or funding criteria.

PHA Policy

The PHA will provide public notice at least 10 days before closing any waiting list. The waiting list will be closed once the total number of applications to be accepted, as outlined in the public notice for the opening, is reached.

Reopening the Waiting List

If the waiting list has been closed, it will not be reopened until the PHA publishes notice in local newspapers of general circulation, minority media, and other suitable media outlets. The notice must comply with HUD fair housing requirements and must specify who may apply, and where and when applications will be received.

PHA Policy

The PHA will announce the reopening of the waiting list at least ~~7~~10 business days prior to the date applications will first be accepted. If the list is only being reopened for certain categories of families, this information will be contained in the notice.

OHA will give public notice by publishing the relevant information in suitable media outlets including, but not limited to:

Omaha World-Herald

Omaha Star

El Perico

OHA's website

American Classified

4-II.D. FAMILY OUTREACH [HCV GB, pp. 4-2 to 4-4]

The PHA must conduct outreach as necessary to ensure that the PHA has a sufficient number of applicants on the waiting list to use the HCV resources it has been allotted.

Because HUD requires the PHA to admit a specified percentage of extremely low-income families to the program (see Chapter 4, Part III), the PHA may need to conduct special outreach to ensure that an adequate number of such families apply for assistance [HCV GB, p. 4-20 to 4-21].

PHA outreach efforts must comply with fair housing requirements. This includes:

- Analyzing the housing market area and the populations currently being served to identify underserved populations
- Ensuring that outreach efforts are targeted to media outlets that reach eligible populations that are underrepresented in the program
- Avoiding outreach efforts that prefer or exclude people who are members of a protected class

PHA outreach efforts must be designed to inform qualified families about the availability of assistance under the program. These efforts may include, as needed, any of the following activities:

- Submitting press releases to local newspapers, including minority newspapers
- Developing informational materials and flyers to distribute to other agencies
- Providing application forms to other public and private agencies that serve the low income population
- Developing partnerships with other organizations that serve similar populations, including agencies that provide services for persons with disabilities

PHA Policy

The PHA will monitor the characteristics of the population being served and the characteristics of the population as a whole in the PHA's jurisdiction. Targeted outreach efforts will be undertaken if a comparison suggests that certain populations are being underserved.

4-II.E. REPORTING CHANGES IN FAMILY CIRCUMSTANCES

PHA Policy

While the family is on the waiting list, the family must immediately inform the PHA of changes in contact information, including current residence, mailing address, and phone number. The changes must be submitted in the OHA web portal. ~~in writing.~~

4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204]

HUD requires the PHA to establish policies to use when removing applicant names from the waiting list.

Purging the Waiting List

The decision to withdraw an applicant family that includes a person with disabilities from the waiting list is subject to reasonable accommodation. If the applicant did not respond to a OHA request for information or updates, and OHA determines that the family did not respond because of the family member's disability, OHA must reinstate the applicant family to their former position on the waiting list [24 CFR 982.204(c)(2)].

PHA Policy

The waiting list will be updated as necessary to ensure that all applicant information remains current and timely.

To update the waiting list, the Public Housing Authority (PHA) will send a request via first-class mail or email to each family on the waiting list. This request will determine if the family continues to be interested in and qualifies for the program. The update request will be sent to the last address or email that the PHA has on record for the family. It will also provide a deadline for the family's response and notify them that failure to respond will result in their removal from the waiting list.

The family's response must be submitted through the online portal or in writing. Responses can be delivered in person, by mail, by email, or by fax. All responses should be postmarked or received by the PHA no later than 15 business days from the date of the PHA letter.

If the notice is returned by the post office without a forwarding address, the applicant will be removed from the waiting list without further notice. If the notice is returned with a forwarding address, it will be re-sent to that new address. The family will then have 15 business days from the date the letter is re-sent to respond.

If a family is removed from the waiting list for failure to respond, the PHA may reinstate the family if it is determined that the lack of response was due to an error by the PHA, circumstances beyond the family's control, a family member's disability, or as a direct result of being a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, including any adverse effects resulting from such abuse.

Removal from the Waiting List

PHA Policy

If at any time an applicant family is on the waiting list, the PHA determines that the family is not eligible for assistance (see Chapter 3), the family will be removed from the waiting list.

If a family is removed from the waiting list because the PHA has determined the family is not eligible for assistance, a notice will be sent to the family's address of record as well as to any alternate address provided on the initial application. The notice will state the reasons the family was removed from the waiting list and will inform the family how to request an informal review regarding the PHA's decision (see Chapter 16) [24 CFR 982.201(f)].

PART III: SELECTION FOR HCV ASSISTANCE

4-III.A. OVERVIEW

As vouchers become available, families on the waiting list must be selected for assistance in accordance with the policies described in this part.

The order in which families receive assistance from the waiting list depends on the selection method chosen by the PHA. The source of HCV funding also may affect the order in which families are selected from the waiting list.

The PHA must maintain a clear record of all information required to verify that the family is selected from the waiting list according to the PHA's selection policies [24 CFR 982.204(b) and 982.207(e)].

4-III.B. SELECTION AND HCV FUNDING SOURCES

Special Admissions [24 CFR 982.203]

HUD may award funding for specifically named families living in specified types of units (e.g., a family that is displaced by demolition of public housing; a non-purchasing family residing in a HOPE 1 or 2 projects). In these cases, the PHA may admit families that are not on the waiting list, or without considering the family's position on the waiting list. The PHA must maintain records showing that such families were admitted with special program funding.

The PHA administers Tenant Protection Vouchers and Enhanced Vouchers. These vouchers are provided by HUD specifically for families residing in a HUD-assisted subsidized housing project who may be displaced by housing conversion actions (for example, if an owner of a HUD-subsidized housing project opts out of its contract). Tenant Protection Vouchers and Enhanced Vouchers are tenant-based assistance. In general, the PHA's tenant-based HCV policies apply to special admission vouchers made available for families as the result of housing conversion actions. Enhanced vouchers have unique requirements, including increased payment standards. Families may not apply directly to the PHA to receive this assistance, and The PHA maintains separate waiting lists for this assistance. This assistance is provided only to specific families identified by HUD.

Targeted Funding [24 CFR 982.204(e)]

HUD may award funding for a specified category of families on the waiting list. This is referred to as "targeted funding" because the voucher is targeted to a specific population and has specific selection criteria. The PHA must use this funding only to assist the families within the specified category. When a voucher becomes available that is funded by a specific targeted funding program, The PHA may skip families that do not qualify for the program. Within this category of families, the order in which such families are assisted is determined according to the policies provided in Section 4-III.C.

The following are targeted funding programs, each of which has specific selection criteria and program requirements.

Mainstream Voucher Program

The Mainstream Voucher Program provides housing assistance targeted to nonelderly persons with disabilities.

For purposes of eligibility for Mainstream voucher assistance, HUD uses the definition of “person with disabilities” at 24 CFR 5.403, which is the same definition of “person with disabilities” used for eligibility and deductions, and which is provided in Exhibit 3-1 at the end of Chapter 3.

- The PHA has an existing stock of Mainstream vouchers. Eligibility for these vouchers is limited to “disabled families” in which the head of household, spouse, or co-head is a nonelderly person with disabilities, as defined in Section 3-I.I.

The PHA may pursue application for additional Mainstream vouchers. Under new HUD program rules, eligibility for these vouchers is expanded to include any family that includes a non-elderly person with disabilities. The non-elderly person with disabilities does not have to be the head of household, spouse, or co-head.

Persons may submit applications at any time the PHA’s HCV waiting list is open and accepting new applications. All applicants will be placed on the PHA’s HCV tenant-based waiting list in accord with the PHA’s routine procedures, including local preferences. When a Mainstream voucher becomes available, the PHA will select the next applicant on its waiting list that meets the eligibility criteria for Mainstream voucher assistance.

Family Unification Program, including youths aging out of foster care

HUD’s Family Unification Program (FUP) program is targeted to assist two populations:

- Families for whom the lack of adequate housing is a primary factor in (1) the imminent placement of the family’s child/children in out-of-home care, or (2) delay of discharge of the child/children to the family from out-of-home care;
- Youth aged 18 to 24 who left foster care or will leave foster care within the near future and are homeless or at risk of becoming homeless. In accord with HUD rules, FUP voucher assistance for youths aging out of foster care is limited to 36 months.

At present, the PHA does not receive HUD FUP funding. The PHA may pursue application for FUP voucher funding. FUP program requirements include the following:

Persons may receive FUP assistance only by referral from the DHHS public child welfare agency. Following referral, persons will be placed on the HCV tenant-based waiting list in accordance with routine procedures, including local preferences. When a FUP voucher becomes available, it will be offered to the next applicant on its waiting list that meets the eligibility criteria for FUP voucher assistance.

Veteran Assisted Supportive Housing (VASH)

This program for homeless veterans combines HUD voucher assistance with case management and clinical services provided by the Department of Veterans Affairs (VA). Eligibility is limited to homeless veterans and their families. Persons may receive VASH assistance only by referral from VA case managers. Persons may not apply for VASH assistance directly through the PHA. When a VASH voucher becomes available, the PHA will coordinate with VA case managers for referral to receive assistance.

The PHA will administer its VASH assistance in accord with HUD VASH rules and regulations, which significantly differ from other HCV program rules. Per HUD rules, the PHA's local preferences do not apply to VASH assistance. In addition, many of the PHA's policies for screening, criminal background checks, and denial of assistance are waived under HUD VASH rules.

HOME Tenant-Based Rental Assistance

The HOME Tenant-Based Rental Assistance provides up to 24 months in rental assistance to households that have completed a transitional housing program for the homeless or supportive services program. Persons may receive HOME assistance only by referral from approved transitional housing and supportive housing programs. Persons may not apply for HOME rental assistance directly through the PHA. The PHA administers its HOME rental assistance program in accord with program rules, which may differ from the PHA's HCV policies.

Upon completion of the 24-month period of assistance, HOME TBRA participants who have maintained housing and who are able to meet all eligibility criteria for the HCV program, including the criminal background check, are awarded an HCV voucher. At the PHA's discretion, the PHA may award an HCV voucher to a HOME TBRA participant at an alternate time. This includes cases when a household with HOME TBRA assistance wishes to move to a unit for which voucher assistance must be ported to a different housing authority that does not administer the HOME TBRA program. In every case, a HOME TBRA participant must meet all eligibility criteria for the HCV program, including the criminal background check.

HUD Continuum of Care Rental Assistance Program

~~The Continuum of Care Rental Assistance Program combines tenant-based rental assistance with case management and supportive services to provide permanent supportive housing for chronically homeless persons with disabilities. Persons may receive Continuum of Care rental assistance only by referral from Community Alliance. Persons may not apply for Continuum of Care rental assistance directly through OHA. OHA administers its Continuum of Care Rental Assistance Program in accord with program rules, which may differ from OHA's HCV policies.~~

HUD Moderate Rehabilitation Program

The PHA administers project-based voucher assistance for designated properties previously rehabilitated under HUD's moderate rehabilitation program. Applicants are referred to the PHA from the properties waiting list. Once the property determines the family meets the properties screening criteria the applicant is referred to the PHA determination of eligibility. The PHA will screen applicants for eligibility to mod rehab assisted housing units based on mod rehab program guidelines. The PHA administers its mod rehab assistance in accord with HUD program rules, which may differ from the PHA's HCV policies.

Relocation Admissions

Background: The PHA may undertake demolition, disposition, conversion, or redevelopment activities that may require relocation of current residents of public housing or tax credit units owned by the PHA or Housing in Omaha (HIO). Whenever possible, the PHA will apply for Tenant Protection Vouchers (TPVs)—either Relocation TPVs or Replacement TPVs, as appropriate—so that the PHA may provide HCV voucher assistance as a comparable housing option to families subject to relocation. TPVs are considered “special admissions,” and thereby voucher assistance may be provided without opening the wait list, according to “Special Admissions” policies at the beginning of this Section 4-III.B. However, there is no guarantee that HUD will fund 100% of the TPVs needed for the number of families who desire HCV assistance for relocation. In addition, the time required for HUD approval of TPV funding may delay relocation or may limit the relocation options the PHA can offer at the time relocation begins. This policy regarding Relocation Admissions is intended to clarify how the PHA may use its existing HCV voucher stock when needed to cover potential gaps in TPV funding.

HUD Regulations Relevant to OHA’s Relocation Admissions Policies:

- Special admissions permit admission to the HCV program outside the waiting list but are limited to cases when HUD awards voucher funding targeted to families living in specific units, such as TPVs. 24 CFR 982.203.
- Except for special admissions, participants must be selected from the PHA waiting list. The PHA must select participants from the waiting list in accordance with the admission policies in the PHA administrative plan. 24 CFR 982.204(a).
- When the PHA opens a waiting list, the PHA must give public notice that families may apply for tenant-based assistance. 24 CFR 982.206(a)(1).
- The PHA may adopt criteria defining what families may apply for assistance under a public notice. 24 CFR 982.206(b). The public notice must state any limitations on who may apply for available slots in the program. 24 CFR 982.206(a)(3).
- The PHA may establish a system of local preferences for selection of families admitted to the program. PHA selection preferences must be described in the PHA administrative plan. 24 CFR 982.207(a).

PHA Policies for Relocation Admissions:

The PHA at its discretion may open its HCV wait list to accept applications for Relocation Admissions, limited to families who are residents of specified units owned by the PHA or HIO and who are subject to relocation due to the PHA’s demolition, disposition, conversion, or redevelopment activities, as follows:

- Wait list openings for Relocation Admissions will occur only for specified units potentially affected by demolition, disposition, conversion, or redevelopment actions that have been approved by OHA’s Board of Commissioners.
- The PHA will provide public notice of such wait list opening, as provided in Section 4-II.C.
- The public notice will state limitations on who may submit applications.
- Families who apply for HCV assistance under the Relocation Admissions policies must meet the same eligibility, income limits, and the PHA’s screening requirements as regular admissions to the PHA’s HCV Program.

- Families who apply for HCV assistance under the PHA's Relocation Admissions receive an absolute preference above any other applicants on the HCV wait list, as provided in Section 4-III.C, "Local Preferences."
- When HUD TPV funding is granted, the PHA may determine to close its wait list for regular HCV vouchers. Remaining families subject to relocation who desire voucher assistance as a relocation option will be provided TPV vouchers administered in accord with HUD requirements and the PHA's procedures for TPVs, as provided in Section 4-III.B, "Special Admissions." However, if the TPV funding does not provide sufficient vouchers to serve all families who desire voucher assistance for relocation, the PHA may determine to continue to accept applications in order to provide HCV voucher assistance to the remaining families.
- When the TPV funding is Relocation TPVs, the PHA will carefully plan its wait list opening and use of existing HCV stock to minimize loss of housing subsidies available in the community.

The PHA may open its HCV wait list to accept applications for Relocation Admissions limited to families who formerly were residents of public housing scattered site units approved for disposition under OHA's Section 32 Homeownership Program in October 2018 and who received a 90-day notice dated on or about March 1, 2019. OHA had not applied for TPVs in this disposition application, and OHA had not yet implemented changes to this Administrative Plan facilitating use of the PHA's HCV voucher stock for relocation. The PHA wishes to provide equal housing opportunities to all families subject to relocation under its Section 32 Homeownership Program. The families specified in this paragraph, already relocated, will be offered a time- limited opportunity to apply for and lease-up with HCV voucher assistance, if they desire.

Regular HCV Funding

Regular HCV funding may be used to assist any eligible family on the waiting list. Families are selected from the waiting list according to the policies provided in Section 4-III.C.

4-III.C. SELECTION METHOD

This section describes the method for selecting applicant families from the waiting list, including the system of admission preferences that the PHA will use [24 CFR 982.202(d)].

Local Preferences [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. The PHA may change these preferences to respond to changes in local housing needs or emergency housing situations. In addition, the PHA may establish temporary preferences in accord with HUD and local priorities.

- a. In the event of a local, regional, or national disaster, OHA staff with the approval of OHA Board of Commissioners may determine criteria by which households who are victims of a disaster may qualify for a temporary preference.
- b. A preference will be provided for persons or households that reside in buildings that are owned or operated by OHA or a legal affiliate, as defined in state law, and which building have been approved for demolition or disposition by the Board of Commissioners and/or the Department of Housing and Urban Development.
- c. The PHA will offer a preference to any family that has been terminated from its HCV program due to insufficient program funding.

The PHA will verify all preference claims at the time they are made. Staff will re-verify a preference claim at the time of selection from the waiting list. Applicant families must still meet the preference eligibility criteria at time of selection from the waitlist in order to be offered a voucher at that time. If a family fails to qualify for any criteria that affected the order in which it was selected from the waiting list, the family will be returned to its original position on the waiting list. The PHA will notify the family in writing that it has been returned to the waiting list, and will specify the reasons for it.

An applicant may qualify for more than one preference. An applicant will be assigned the total sum of points for all preferences for which the applicant is qualified.

The PHA will first assist families that have been terminated from the HCV program due to insufficient funding.

OHA's preferences are summarized below:

Relocation Admissions (as described in Section 4-III.B)	Absolute
HOME TBRA participants at expiration of TBRA (as described in Section 4-II.B)	Absolute
Homeless individuals and families (with verification from a MACCH agency)	100 points
<u>Emergency Housing Voucher participants- who Meet Specific Criteria: Families that were over leased criteria:</u> <u>Families that are currently leased under the EHV program that OHA has</u>	<u>Absolute</u>

<u>determined are leased over the original allocation. Refer to the EHV addendum.</u> <u>This preference is limited to five (5) households.</u>	
Nonelderly Persons with Disabilities who Meet Specific Housing Criteria: Families that include one or more nonelderly adults with disabilities who meet one of the following housing criteria: • Transitioning out of institutional and other segregated settings • At serious risk of institutionalization • Currently experiencing homeless • At risk of experiencing homelessness • Previously experienced homelessness and is currently a client in a permanent supportive housing or rapid rehousing project These terms are defined below. This preference is limited to fifteen (15) households.	100 Points

Preferences for Nonelderly Persons with Disabilities who Meet Specific Housing Criteria

This preference is limited to fifteen (15) households.

This preference is developed in accord with requirements for the Mainstream Voucher Program, but is not limited to Mainstream vouchers.

The PHA will accept referrals from MACCH agencies, but the PHA cannot limit eligibility for this preference to persons referred by a MACCH agency. The PHA must permit applicants to apply directly to PHA without going through a MACCH agency.

The PHA will require verification that the applicant satisfies the criteria of this preference.

The following are definitions specific to this preference:

Eligible family: A family composed of one or more non-elderly person with disabilities, which may include additional members who are not non-elderly persons with disabilities. A family where the sole member is an emancipated minor is not an eligible family.

Non-elderly person with disabilities: A person 18 years of age or older and less than 62 years of age, and who:

- Has a disability, as defined in 42 U.S.C. 423;
- Is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that:
 - Is expected to be of long-continued and indefinite duration;
 - Substantially impedes his or her ability to live independently, and
 - Is of such a nature that the ability to live independently could be improved by more suitable housing conditions; or
- Has a developmental disability as defined in 42 U.S.C. 6001.

Institutional or other segregated settings include, but are not limited to: (1) congregate settings populated exclusively or primarily with individuals with disabilities; (2) congregate settings characterized by regimentation in daily activities, lack of privacy or autonomy, policies limiting visitors, or limits on individuals' ability to engage freely in community activities and to manage their own activities of daily living; or (3) settings that provide for daytime activities primarily with other individuals with disabilities.

At serious risk of institutionalization: Includes an individual with a disability who as a result of a public entity's failure to provide community services or its cut to such services will likely cause a decline in health, safety, or welfare that would lead to the individual's eventual placement in an institution. This includes individuals experiencing lack of access to supportive services for independent living, long waiting lists for or lack of access to housing combined with community-based services, individuals currently living under poor housing conditions or homeless with barriers to geographic mobility, and/or currently living alone but requiring supportive services for independent living. A person cannot be considered at serious risk of institutionalization unless the person has a disability. An individual may be designated as at serious risk of institutionalization either by a health and human services agency, by a community-based organization, or by self-identification.

Persons currently experiencing homelessness means:

(1) An individual or family who lacks a fixed, regular, adequate nighttime residence, meaning:

- An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals); or
- An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

- The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
- No subsequent residence has been identified; and
- The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney- Vento Homeless Assistance Act (42 U.S.C. 11434a);
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
- Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
- Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, **human trafficking**, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either

taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

- Has no other residence; and
- Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

At risk of experiencing homeless: An individual or family who:

(i) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and

(ii) Meets one of the following conditions:

- Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- Is living in the home of another because of economic hardship;
- Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days of the date of application for assistance;
- Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
- Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons, or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
- Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.

Permanent supportive housing means permanent housing in which voluntary supportive services are provided to assist homeless persons with a disability to live independently.

Rapid rehousing means time-limited housing assistance in which supportive services are provided to assist homeless persons rapidly connect to and maintain permanent housing.

Income Targeting Requirement [24 CFR 982.201(b)(2)]

HUD requires that extremely low-income (ELI) families make up at least 75% of the families admitted to the HCV program during the PHA's fiscal year. ELI families are those with annual incomes at or below 30% of the area median income. To ensure this requirement is met, a PHA may skip non-ELI families on the waiting list in order to select an ELI family.

Low income families admitted to the program that are "continuously assisted" under the 1937 Housing Act [24 CFR 982.4(b)], as well as low-income or moderate-income families admitted to the program that are displaced as a result of the prepayment of the mortgage or voluntary termination of an insurance contract on eligible low-income housing, are not counted for income targeting purposes [24 CFR 982.201(b)(2)(v)].

PHA Policy

The PHA will monitor progress in meeting the ELI requirement throughout the fiscal year. Extremely low-income families will be selected ahead of other eligible families on an as needed basis to ensure the income targeting requirement is met.

Order of Selection

The PHA system of preferences may select families based on local preferences according to the date and time of application or by a random selection process (lottery) [24 CFR 982.207(c)]. If a PHA does not have enough funding to assist the family at the top of the waiting list, it is not permitted to skip down the waiting list to a family that it can afford to subsidize when there are not sufficient funds to subsidize the family at the top of the waiting list [24 CFR 982.204(d) and (e)].

PHA Policy

Families will be selected from the waiting list based on the targeted funding or selection preference(s) for which they qualify, and in accordance with the PHA's hierarchy of preferences, if applicable. Within each targeted funding or preference category, families will be selected on a first-come, first-served basis according to the date and time their complete application is received by the PHA.

Documentation will be maintained by the PHA as to whether families on the list qualify for and are interested in targeted funding. If a higher placed family on the waiting list is not qualified or not interested in targeted funding, there will be a notation maintained so that the PHA does not have to ask higher placed families each time targeted selections are made.

Applicants will be placed on the waiting list according to their preference status. Among applicants with equal preference status, the waiting list will be organized by date and time.

Short-term: families will be selected from the waiting list on a first-come, first-served basis according to the date and time their complete application is received by OHA.

Families that qualify for a specified category of program funding (targeted funding) may be selected from the waiting list ahead of higher placed families that do not qualify for the targeted funding.

However, within any targeted funding category, applicants will be selected on a first-come, first-served basis according to the date and time their completed application is received

Random selection: families will be selected from the waiting list in numerical order based on the numbers that were assigned to each application, by lottery, at the time the applications were placed on the waiting list.

Families that qualify for a specified category of program funding (targeted funding) may be selected from the waiting list ahead of higher placed families that do not qualify for the targeted funding. However, within any targeted funding category, applicants will be selected in numerical order based on the numbers that were assigned to each application, by lottery, at the time the applications were placed on the waiting list.

OHA's method for organizing the waiting list will be announced in the public notice of the waiting list opening.

4-III.D. NOTIFICATION OF SELECTION

When a family has been selected from the waiting list, the PHA must notify the family. [24 CFR 982.554(a)]

PHA Policy

The PHA will notify the family by first class mail, **email or web portal** when it is selected from the waiting list. The notice will inform the family of the following:

- Date, time, and location of the scheduled application interview, including any procedures for rescheduling the interview
- Who is required to attend interview
- All documents that must be provided at the interview, including information about what constitutes acceptable documentation.

If a notification letter is returned to the PHA with no forwarding address, the family will be removed from the waiting list. A notice of denial (see Chapter 3) will be sent to the family's address of record, as well as to any known alternate address.

4-III.E. THE APPLICATION INTERVIEW

HUD recommends that the PHA obtain the information and documentation needed to make an eligibility determination through a private interview [HCV GB, pg. 4-16]. Being invited to attend an interview does not constitute admission to the program.

Assistance cannot be provided to the family until all SSN documentation requirements are met. However, if the PHA determines that an applicant family is otherwise eligible to participate in the program, the family may retain its place on the waiting list for a period of time determined by the PHA. (Notice PIH 2012-10).

Reasonable accommodation will be made for persons with disabilities who are unable to attend an interview due to their disability.

PHA Policy

Any applicant that arrives more than 15 minutes after their scheduled appointment time will not be seen.

Families selected from the waiting list are required to participate in an eligibility interview.

All family members 18 years of age or older are required to attend the interview.

The interview will be conducted only if the head of household or spouse/cohead provides acceptable documentation of legal identity. (Chapter 7 provides a discussion of proper documentation of legal identity). If the family representative does not provide the required documentation **at the time of the interview, they will be required to provide it within 10 business days.**

~~Appointment may be rescheduled when the proper documents have been obtained.~~

Pending disclosure and documentation of social security numbers, the PHA will allow the family to retain its place on the waiting list for 180 days. If not, all household members have disclosed their SSNs at the next time the PHA is issuing vouchers, the PHA will issue a voucher to the next eligible application family on the waiting list.

The family must provide the information necessary to establish the family's eligibility and determine the appropriate level of assistance, as well as completing required forms, providing required signatures, and submitting required documentation. If any materials are missing, the PHA will provide the family with a written list of items that must be submitted.

Any required documents or information that the family is unable to provide at the interview must be provided within 10 business days of the interview (Chapter 7 provides details about longer submission deadlines for particular items, including documentation of Social Security numbers and eligible noncitizen status). If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the required documents and information are not provided within the required time frame (plus any extensions), the family will be sent a notice of denial (See Chapter 3).

An advocate, interpreter, or other assistant may assist the family with the application and the interview process. **The family and the PHA must execute a certification attesting to the role and assistance of the third-party in the application interview process.**

Interviews will be conducted in English. For limited English proficient (LEP) applicants, the PHA will provide translation services in accordance with the PHA's LEP plan.

If the family is unable to attend a scheduled interview, the family should contact the PHA in advance of the interview to schedule a new appointment. In all circumstances, if a family does not attend a scheduled interview, the PHA will send another notification letter with a new interview appointment time. Applicants who fail to attend two scheduled interviews without PHA approval will be denied assistance based on the family's failure to supply information needed to determine eligibility. A notice of denial will be issued in accordance with policies contained in Chapter 3.

4-III.F. COMPLETING THE APPLICATION PROCESS

The PHA must verify all information provided by the family (see Chapter 7). Based on verified information, the PHA must make a final determination of eligibility (see Chapter 3) and must confirm that the family qualified for any special admission, targeted admission, or selection preference that affected the order in which the family was selected from the waiting list.

OHA Policy

If OHA determines that the family is ineligible, OHA will send written notification of the ineligibility determination within 10 business days of the determination. The notice will specify the reasons for ineligibility and will inform the family of its right to request an informal review (Chapter 16).

If a family fails to qualify for any criteria that affected the order in which it was selected from the waiting list (e.g. targeted funding, extremely low-income), the family will be returned to its original position on the waiting list. The PHA will notify the family in writing that it has been returned to the waiting list and will specify the reasons for it.

If OHA determines that the family is eligible to receive assistance, OHA will invite the family to attend a briefing in accordance with the policies in Chapter 5.

Chapter 5

BRIEFINGS AND VOUCHER ISSUANCE

This chapter explains the briefing and voucher issuance process. When a family is determined to be eligible for the Housing Choice Voucher (HCV) program, The PHA must ensure that the family fully understands the way the program operates and the family's obligations under the program. This is accomplished through both an oral briefing and provision of a briefing packet containing the HUD-required documents and other information the family needs to know in order to lease a unit under the program. Once the family is fully informed of the program's requirements, The PHA issues the family a voucher. The voucher includes the unit size for which the family qualifies based on The PHA's subsidy standards, as well as the issue and expiration date of the voucher. The voucher is the document that authorizes the family to begin its search for a unit and limits the amount of time the family has to successfully locate an acceptable unit.

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

This chapter describes HUD regulations and PHA policies related to these topics in two parts:

Part I: Briefings and Family Obligations. This part details the program's requirements for briefing families orally, and for providing written materials describing the program and its requirements. It includes a particular focus on the family's obligations under the program.

Part II: Subsidy Standards and Voucher Issuance. This part discusses OHA's standards for determining how many bedrooms a family of a given composition qualifies for, which in turn affects the amount of subsidy the family can receive. It also discusses the policies that dictate how vouchers are issued, and how long families have to locate a unit.

PART I: BRIEFINGS AND FAMILY OBLIGATIONS

5-I.A. OVERVIEW

HUD regulations require OHA to conduct mandatory briefings for applicant families who qualify for a voucher. The briefing provides a broad description of owner and family responsibilities, explains OHA's procedures, and includes instructions on how to lease a unit. This part describes how oral briefings will be conducted, specifies what written information will be provided to families, and lists the family's obligations under the program. The PHA must take reasonable steps to ensure meaningful access by persons with Limited English proficiency.

5-I.B. BRIEFING [24 CFR 982.301]

Notification of Briefing

Prior to issuance of a voucher, PHA must give the family an oral briefing and provide the family with a briefing packet containing written information about the program. Families may be briefed in individual face-to-face meetings, through group briefing sessions, or via remote briefing sessions.

PHA Policy

Families will be notified of their eligibility for assistance at the time they are invited to a briefing. The notice will be sent by first class mail and will also be sent by email if the family has provided a valid email address to PHA.

The notice will advise the family of the type of briefing, who is required to be present at the briefing, and the date and time of the briefing. The notice will also inform the family of any additional requirements for in-person or remote briefings as addressed in relevant policy elsewhere in this section.

If the notice is returned by the post office with no forwarding address, the applicant will be denied, and their name will not be placed back on the waiting list. If the notice is returned by the post office with a forwarding address, the notice will be sent to the address indicated.

In-Person Briefings

At the briefing, the PHA must ensure effective communication in accordance with Section 504 requirements (Section 504 of the Rehabilitation Act of 1973) and ensure that the briefing site is accessible to individuals with disabilities. For a more thorough discussion of accessibility requirements, refer to Chapter 2.

PHA Policy

In-person briefings will generally be conducted in group meetings. At the family's written request, OHA may provide an individual briefing.

Generally, all members 18 years of age and older the head of the household isare required to attend the briefing. If the head of household is unable to attend, the head of household must provide a written request to designate another adult to attend the briefing. The PHA must approve prior to the briefing.

In-Person Briefings

Families that attend group briefings and still need individual assistance will be referred to an appropriate PHA staff person.

Briefings will be conducted in English. For limited English proficient (LEP) applicants, OHA will provide interpretation services in accordance with OHA's LEP plan (See Chapter 2).

Attendance

PHA Policy

Applicants who fail to attend a scheduled in-person briefing will be scheduled for another briefing automatically. The PHA will notify the family of the date and time of the second scheduled briefing. Applicants who fail to attend two scheduled briefings, without prior PHA approval, will be denied assistance (see Chapter 3).

Remote Briefings [Notice PIH 2020-32]

Remote briefings may be conducted over the phone, via video conferencing, or through other virtual platforms.

PHA Policy

The PHA has the sole discretion to require that briefings be conducted remotely in case of local, state, or national physical distancing orders, and in cases of inclement weather or natural disaster. If the PHA schedules a remote briefing, the PHA will conduct a face-to-face briefing upon request of the applicant as a reasonable accommodation for a person with a disability if safety and health concerns can be reasonably addressed.

In addition, the PHA will conduct a briefing remotely upon request of the applicant as a reasonable accommodation for a person with a disability, if an applicant does not have childcare or transportation that would enable them to attend the briefing, or if the applicant believes an in-person briefing would create an undue health risk. The PHA will consider other reasonable requests for a remote briefing on a case-by-case basis.

Accessibility Requirements for Persons with Disabilities and LEP Individuals

As with in-person briefings, the platform for conducting remote briefings must be accessible and the briefing conducted in accordance with Section 504 and accessibility requirements. This includes ensuring any information, websites, emails, digital notifications, and other virtual platforms are accessible for persons with vision, hearing, and other disabilities. Further, providing effective communication in a digital context may require the use of individualized auxiliary aids or services, such as audio description, captioning, sign language and other types of interpreters, keyboard accessibility, accessible documents, screen reader support, and transcripts. Auxiliary aids or services must be provided in accessible formats, in a timely manner, and in such a way to protect the privacy and independence of the individual.

If no method of conducting a remote briefing is available that appropriately accommodates an individual's disability, the PHA may not hold against the individual his or her inability to participate in the remote briefing, and the PHA should consider whether postponing the remote briefing to a later date is appropriate or whether there is a suitable alternative.

Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation, will depend on the specific circumstances.

Limited English Proficiency (LEP) requirements also apply to remote briefings, including the use of interpretation services and document translation. See Chapter 2 for a more thorough discussion of accessibility and LEP requirements, all of which apply in the context of remote briefings.

Conducting Remote Briefings

The PHA must ensure that the lack of technology or inability to use technology for remote briefings does not pose a disadvantage to families that may not be apparent to the PHA. The PHA must ensure that the family has appropriate technological access in order to fully participate in the remote briefing.

PHA Policy

At least 10 business days prior to scheduling the remote briefing, the PHA will provide written notification via first class mail and/or email to families participating in the briefing to advise of technological requirements and to request the family notify the PHA of any known barriers. If any family does not respond within five business days, or if the written notification is returned by the post office or the email is rejected, the PHA will contact the family by telephone to identify potential technological barriers and to determine which technology resources are accessible to the family. The PHA will resolve any barriers using the guidance in Section 6 of Notice PIH 2020-32, including offering the family the opportunity to attend an in-person briefing or have a one-on-one briefing over the phone, as appropriate.

The PHA will conduct remote briefings via a video conferencing platform when available. If applicants are unable to adequately access the video conferencing platform, the briefing will be conducted by telephone conferencing call-in. If the family is unable to adequately access the telephone conferencing call-in, the remote briefing will be postponed, and an in-person alternative or one-on-one briefing over the phone will be provided.

The PHA will provide login information and/or conferencing call-in information and an electronic copy of the briefing packet via email at least five business days before the briefing. The PHA will provide a paper copy of the briefing packet upon family request, and may reschedule the briefing to allow adequate time for the family to receive the physical briefing packet.

The PHA will ensure that all electronic information stored or transmitted as part of the briefing meets the requirements for accessibility for persons with disabilities and persons with LEP, and is secure, including ensuring personally identifiable information (PII) is protected.

The PHA will ensure that families who participate in remote briefings have the opportunity to ask questions as part of the briefing.

If families lose connectivity during any remote briefing or otherwise feel they were unable to access information presented during the briefing, the family may request a one-on-one briefing over the phone or in person with the PHA.

Oral Briefing [24 CFR 982.301(a)]

Each briefing must provide information on the following subjects:

- How the Housing Choice Voucher program works;
- Family and owner responsibilities;
- Where the family can lease a unit, including renting a unit inside or outside the PHA's jurisdiction and any information on selecting a unit that HUD provides;
- An explanation of how portability works. ~~The PHA may not discourage the family from choosing to live anywhere in the PHA jurisdiction or outside the PHA jurisdiction under portability, unless otherwise expressly authorized by statute, regulation, PIH Notice, or court order;~~
- The PHA must inform the family of how portability may affect the family's assistance through screening, subsidy standards, payment standards, and any other elements of the portability process which may affect the family's assistance; and
- An explanation of the ~~The~~ advantages of areas that do not have a high concentration of low-income families. ~~;~~ ~~and~~
- ~~For families receiving welfare-to-work vouchers, a description of any local obligations of a welfare-to-work family and an explanation that failure to meet the obligations is grounds for denial of admission or termination of assistance.~~

The PHA may not discourage the family from choosing to live anywhere in the PHA's jurisdiction or outside the PHA's jurisdiction under portability, unless otherwise expressly authorized by statute, regulation, PIH Notice, or court order.

~~In briefing a family that includes a person with disabilities,~~ The PHA must ~~also~~ take appropriate steps to ensure effective communication in accordance with 24 CFR 8.6 and 28 CFR part 35, subpart E, and must provide information on the reasonable accommodation process.

Briefing Packet [24 CFR 982.301(b)]; *New HCV GB, Housing Search and Leasing*, p. 7]

Documents and information provided in the briefing packet must include the following:

- The term of the voucher, voucher suspensions, and the PHA's policies on any extensions of the term. If the PHA allows extensions, the packet must explain how the family can request an extension.
- A description of the method used to calculate the housing assistance payment for a family, including how the PHA determines the payment standard for a family and; how the PHA determines total tenant payment for a family, ~~and information on the payment standard and utility allowance schedule.~~
- An explanation of how the PHA determines the maximum allowable rent for an assisted unit.
- Where the family may lease a unit and an explanation of how portability works, including information on how portability may affect the family's assistance through screening, subsidy standards, payment standards, and any other elements of the portability process that may affect the family's assistance.
- The HUD-required tenancy addendum, which must be included in the lease.
- The form the family must use to request approval of tenancy, and an explanation ~~description of the procedure~~ for how to requesting approval for a tenancy.
- A statement of the PHA policy on providing information about families to prospective owners.
- The PHA subsidy standards ~~including when and how exceptions are made~~ and when the PHA will consider granting exceptions as allowed by 24 CFR 982.404(b)(8), and when exceptions are required as a reasonable accommodation for persons with disabilities under Section 504, the Fair Housing Act, or the Americans with Disabilities Act (ADA).
- Materials (e.g., brochures) on how to select a unit and any additional information on selecting a unit that HUD provides (e.g., HUD brochure entitled, "A Good Place to Live").
- Information on federal, state and local equal opportunity laws, the contact information for the Section 504 coordinator, ~~and a copy of the housing discrimination complaint form, including information on how to complete the form and file a fair housing complaint~~ and information on how to request a reasonable accommodation or modification (including information on requesting exception payment standards as a reasonable accommodation) under Section 504, the Fair Housing Act, or the Americans with Disabilities Act (ADA).
- A list of landlords known to the PHA who may be willing to lease a unit to the family or other resources (e.g., newspapers, organizations, online search tools) known to the PHA that may assist the family in locating a unit. PHAs must ensure that the list of landlords or other resources covers areas outside of poverty or minority concentration.
- Notice that if the family includes a person with disabilities, ~~the family may request a list of available accessible units known to the PHA~~ the PHA is subject to requirements under 24 CFR 8.28(a)(3) to provide a current listing of accessible units known to the PHA, and if necessary, other assistance in locating an available unit.

- The family obligations under the program, including any obligations of a welfare-to-work family, and any obligations of other special programs if the family is participating in one of those programs.
- The grounds on which the PHA may terminate assistance for a participant family because of family action or failure to act.
- PHA informal hearing procedures including when the PHA is required to offer a participant family the opportunity for an informal hearing, and how to request the hearing.
- An explanation of the advantages of moving to an area that does not have a high concentration of low-income families, which may include access to accessible and high-quality housing, transit, employment opportunities, educational opportunities, recreational facilities, public safety stations, retail services, and health services.
- The HUD pamphlet on lead-based paint entitled, "Protect Your Family from Lead in Your Home:" [24 CFR 35.88].

If the PHA is located in a metropolitan area, the following additional information must be included in the briefing packet in order to receive full points under SEMAP Indicator 7, Expanding Housing Opportunities [24 CFR 985.3(g)]:

- Maps showing areas with housing opportunities outside areas of poverty or minority concentration, both within its jurisdiction and its neighboring jurisdiction
- Information about the characteristics of these areas including job opportunities, schools, transportation, and other services
- An explanation of how portability works, including a list of portability contact persons for neighboring PHAs with names, addresses, and telephone numbers

Additional Items to Be Included in the Briefing Packet

In addition to items required by the regulations, PHAs may wish to include supplemental materials to help explain the program to both participants and owners [HCV GB p. 8-7, Notice PIH 2017-12].

PHA Policy

The PHA will provide the following additional materials in the briefing packet:

The grounds on which the PHA may terminate assistance for a participant family because of family action or failure to act

Requirements for notifying the PHA of any changes in income or family composition

The HUD pamphlet on lead-based paint entitled *Protect Your Family from Lead in Your Home*

Information on how to fill out and file a housing discrimination complaint form

The form HUD-5380 domestic violence certification form and the form HUD-5382 notice of occupancy rights, which contains information on VAWA protections for victims of domestic violence, dating violence, sexual assault, and stalking

“Is Fraud Worth It?” (form HUD-1141-OIG), which explains the types of actions a family must avoid and the penalties for program abuse

“What You Should Know about EIV,” a guide to the Enterprise Income Verification (EIV) system published by HUD as an attachment to Notice PIH 2017-12

5-I.C. FAMILY OBLIGATIONS

Obligations of the family are described in the housing choice voucher (HCV) regulations and on the voucher itself. These obligations include responsibilities the family is required to fulfill, as well as prohibited actions. OHA must inform families of these obligations during the oral briefing, and the same information must be included in the briefing packet. When the family's unit is approved and the HAP contract is executed, the family must meet those obligations in order to continue participating in the program. Violation of any family obligation may result in termination of assistance, as described in Chapter 12.

Time Frames for Reporting Changes Required by Family Obligations

OHA Policy

Unless otherwise noted below, when family obligations require the family to respond to a request or notify OHA of a change, notifying OHA of the request or change within 10 business days is considered prompt notice.

When a family is required to provide notice to OHA, the notice must be in writing.

Family Obligations [24 CFR 982.551]

The family obligations of the voucher are listed as follows:

- The family must supply any information that OHA or HUD determines to be necessary, including submission of required evidence of citizenship or eligible immigration status.
- The family must supply any information requested by OHA or HUD for use in a regularly scheduled reexamination or interim reexamination of family income and composition.
- The family must disclose and verify social security numbers and sign and submit consent forms for obtaining information.
- Any information supplied by the family must be true and complete.
- The family is responsible for any ~~is responsible for any deficiencies under the National Standards for the Physical Inspection of Real Estate (NSPIRE)~~ may be held responsible for a breach of housing quality standards caused by the family's failure to pay tenant-provided utilities or appliances, or damages to the dwelling unit or premises beyond **ordinary normal** wear and tear caused by any member of the household or guest.

PHA Policy

Damages beyond **ordinary normal**-wear and tear will be considered to be damages which could be assessed against the security deposit under state law or in court practice.

- The family must allow the PHA to inspect the unit at reasonable times and after reasonable notice, as described in Chapter 8 of this plan.

- The family must not commit any serious or repeated violation of the lease.

PHA Policy

The PHA will determine if a family has committed serious or repeated violations of the lease based on available evidence, including but not limited to, a court-ordered eviction or an owner's notice to evict, police reports, and affidavits from the owner, neighbors, or other credible parties with direct knowledge.

Serious and repeated lease violations will include, but not be limited to, nonpayment of rent, disturbance of neighbors, destruction of property, living or housekeeping habits that cause damage to the unit or premises, and criminal activity. Generally, the criterion to be used will be whether or not the reason for the eviction was the fault of the tenant or guests. Any incidents of, or criminal activity related to, domestic violence, dating violence, sexual assault, stalking or human trafficking will not be construed as serious or repeated lease violations by the victim [24 CFR 5.2005(c)(1)].

- The family must notify the PHA and the owner before moving out of the unit or terminating the lease.

PHA Policy

The family must comply with lease requirements regarding written notice to the owner. The family must provide written notice to the PHA's at the same time the owner is notified.

- The family must promptly give the PHA a copy of any owner eviction notice.
- The family must use the assisted unit for residence by the family. The unit must be the family's only residence.
- The composition of the assisted family residing in the unit must be approved by the PHA. The family must promptly notify the PHA in writing of the birth, adoption, or court-awarded custody of a child. The family must request PHA approval to add any other family member as an occupant of the unit.

PHA Policy

The request to add a family member must be submitted in writing and approved prior to the person moving into the unit. The PHA will determine eligibility of the new member in accordance with the policies in Chapter 3.

- The family must promptly notify the PHA in writing if any family member no longer lives in the unit.
- If OHA has given approval, a foster child or a live-in aide may reside in the unit. OHA has the discretion to adopt reasonable policies concerning residency by a foster child or a live-in aide, and to define when PHA consent may be given or denied. For policies related to the request and approval/disapproval of foster children, foster adults, and live-in aides, see Chapter 3 (sections I.K and I.M), and Chapter 11 (section II.B).

- The family must not sublease the unit, assign the lease, or transfer the unit.

PHA Policy

Subleasing includes receiving payment to cover rent and utility costs by a person living in the unit who is not listed as a family member.

- The family must supply any information requested by the PHA to verify that the family is living in the unit or information related to family absence from the unit.
- The family must promptly notify the PHA when the family is absent from the unit.

PHA Policy

Notice is required under this provision only when all family members will be absent from the unit for an extended period. An extended period is defined as any period greater than 30 calendar days. Written notice must be provided to OHA at the start of the extended absence.

- The family must pay utility bills and provide and maintain any appliances that the owner is not required to provide under the lease [Form HUD-52646, Voucher].
- The family must not own or have any interest in the unit, (other than in a cooperative and owners of a manufactured home leasing a manufactured home space).
- Family members must not commit fraud, bribery, or any other corrupt or criminal act in connection with the program. (See Chapter 14, Program Integrity for additional information).
- Family members must not engage in drug-related criminal activity or violent criminal activity or other criminal activity that threatens the health, safety or right to peaceful enjoyment of other residents and persons residing in the immediate vicinity of the premises. See Chapter 12 for HUD and PHA policies related to drug-related and violent criminal activity.
- Members of the household must not engage in abuse of alcohol in a way that threatens the health, safety or right to peaceful enjoyment of the other residents and persons residing in the immediate vicinity of the premises. See Chapter 12 for a discussion of HUD and PHA policies related to alcohol abuse.
- An assisted family or member of the family must not receive HCV program assistance while receiving another housing subsidy, for the same unit or a different unit under any other federal, state or local housing assistance program.
- A family must not receive HCV program assistance while residing in a unit owned by a parent, child, grandparent, grandchild, sister or brother of any member of the family, unless the PHA has determined (and has notified the owner and the family of such determination) that approving rental of the unit, notwithstanding such relationship, would provide reasonable accommodation for a family member who is a person with disabilities. [Form HUD-52646, Voucher]

PART II: SUBSIDY STANDARDS AND VOUCHER ISSUANCE

5-II.A. OVERVIEW

The PHA must establish subsidy standards that determine the number of bedrooms needed for families of different sizes and compositions. This part presents the policies that will be used to determine the family unit size (also known as the voucher size) a particular family should receive, and the policies that govern making exceptions to those standards. OHA must also establish policies related to the issuance of the voucher, to the voucher term, and to any extensions of the voucher term.

5-II.B. DETERMINING FAMILY UNIT (VOUCHER) SIZE [24 CFR 982.402]

For each family, The PHA determines the appropriate number of bedrooms under the PHA's subsidy standards and enters the family unit size on the voucher that is issued to the family. The family unit size does not dictate the size of unit the family must actually lease, nor does it determine who within a household will share a bedroom/sleeping room.

The following requirements apply when the PHA determines family unit size:

- The subsidy standards must provide for the smallest number of bedrooms needed to house a family without overcrowding.
- The subsidy standards must be consistent with space requirements under ~~the housing quality standards~~ 24 CFR 5.703.
- ~~The subsidy standards must be consistent with space requirements under the housing quality standards.~~
- The subsidy standards must be applied consistently for all families of like size and composition.
- A child who is temporarily away from the home because of placement in foster care is considered a member of the family in determining the family unit size.
- A family that consists of a pregnant woman (with no other persons) must be treated as a two-person family.
- Any live-in aide (approved by the PHA to reside in the unit to care for a family member who is disabled or is at least 50 years of age) must be counted in determining the family unit size;
- Unless a live-in-aide resides with a family, the family unit size for any family consisting of a single person must be either a zero- or one-bedroom unit, as determined under the PHA's subsidy standards.

PHA Policy

The PHA does not determine who shares a bedroom/sleeping room, but there must be at least one person per bedroom on the Voucher. The PHA's subsidy standards for determining voucher size shall be applied in a manner consistent with Fair Housing guidelines.

For Subsidy Standards, an adult is a person 18 years of age or older.

Generally, the PHA will assign one bedroom for each two persons within the household, except in the following circumstances:

- Persons of the opposite ~~sex~~ gender (other than spouses, and children under age 5) will be allocated separate bedrooms.
- Live-in aides will be allocated a separate bedroom.
- Single person families will be allocated one bedroom.
- Generally, OHA assigns one bedroom to two people within the following guidelines:
- Persons of different generations, persons of the opposite ~~sex~~ gender (other than spouses), and unrelated adults should be allocated a separate bedroom
- Foster children will be included in determining unit size.
- Live-in attendants will generally be provided a separate bedroom. No additional bedrooms are provided for the attendants' family.
- Space may be provided for a child who is away at school but who lives with the family during school recesses.
- Space will not be provided for a family member, other than a spouse, who will be absent most of the time, such as a member who is away in the military.
- Adults of different generations will have separate bedrooms.
- Children of the same ~~sex~~ gender will share a bedroom regardless of age difference.
- A newborn child will share a bedroom with a single head-of-household and/or parent of said child until that child is two (2) years of age.

The PHA will reference the following chart in determining the appropriate voucher size for a family:

Voucher Size	Persons in Household (Minimum – Maximum)
0 Bedroom	1-1
1 Bedroom	1-2
2 Bedrooms	2-4
3 Bedrooms	3-6
4 Bedrooms	4-8
5 Bedrooms	6-10
6 Bedrooms	8-12

5-II.C. EXCEPTIONS TO SUBSIDY STANDARDS

In determining family unit size for a particular family, the PHA may grant an exception to its established subsidy standards if OHA determines that the exception is justified by the age, sex, health, handicap, or relationship of family members or other personal circumstances [24 CFR 982.402(b)(8)]. Reasons may include, but are not limited to:

- A need for an additional bedroom for medical equipment
- A need for a separate bedroom for reasons related to a family member's disability, medical or health condition

For a single person who is not elderly, disabled, or a remaining family member, an exception cannot override the regulatory limit of a zero or one bedroom [24 CFR 982.402(b)(8)].

PHA Policy

The PHA will consider granting an exception for any of the reasons specified in the regulation: the age, sex, health, handicap, or relationship of family members or other personal circumstances.

The family must request any exception to the subsidy standards in writing which will include email. The request must explain the need or justification for a larger family unit size, and must include appropriate documentation. Requests based on health-related reasons must be verified by a knowledgeable professional source (e.g., doctor or health professional), unless the disability and the disability-related request for accommodation is readily apparent or otherwise known. The family's continued need for an additional bedroom due to special medical equipment must be re-verified at annual reexamination.

The PHA will notify the family of its determination within 10 business days of receiving the family's request. If a participant family's request is denied, the notice will inform the family of their right to request an informal hearing.

5-II.D. VOUCHER ISSUANCE [24 CFR 982.302]

When a family is selected from the waiting list (or as a special admission as described in Chapter 4), or when a participant family wants to move to another unit, OHA issues a Housing Choice Voucher, form HUD-52646. This chapter deals only with voucher issuance for applicants. For voucher issuance associated with moves of program participants, please refer to Chapter 10.

The voucher is the family's authorization to search for housing. It specifies the unit size for which the family qualifies and includes both the date of voucher issuance and date of expiration. It contains a brief description of how the program works and explains the family obligations under the program. The voucher is evidence that OHA has determined the family to be eligible for the program, and that OHA expects to have money available to subsidize the family if the family finds an approvable unit. However, OHA does not have any liability to any party by the issuance of the voucher, and the voucher does not give the family any right to participate in the PHA's housing choice voucher program [Voucher, form HUD-52646]

~~A voucher can be issued to an applicant family only after the PHA has determined that the family is eligible for the program based on verification of information received within the 60-120 days prior to issuance [24 CFR 982.201(e)] and after the family has attended an oral briefing [HCV 8-1].~~ The PHA must issue the family a voucher within 60 days of determining the family eligible [24 CFR 982.201(e)]. The income documentation must be dated within 120 days of when it was received by the PHA. However, for fixed-income sources, including Social Security benefits, the documentation must be dated within the appropriate benefit year.

PHA Policy

Vouchers will be issued to eligible applicants immediately following the mandatory briefing.

The PHA should have sufficient funds to house an applicant before issuing a voucher. If funds are insufficient to house the family at the top of the waiting list, the PHA must wait until it has adequate funds before it calls another family from the list [HCV GB p. 8-10].

PHA Policy

Prior to issuing any vouchers, the PHA will determine whether it has sufficient funding in accordance with the policies in Part VIII of Chapter 16.

If the PHA determines that there is insufficient funding after a voucher has been issued, the PHA may rescind the voucher and place the affected family back on the waiting list.

5-II.E. VOUCHER TERM AND EXTENSIONS

Voucher Term [24 CFR 982.303]

The initial term of a voucher must be at least 60 calendar days. The initial term must be stated on the voucher [24 CFR 982.303(a)].

PHA Policy

The initial voucher term will be ~~60~~ 120 calendar days.

The family must submit a Request for Tenancy Approval and proposed lease within the ~~60~~ 120-day period.

The PHA will only grant extensions based upon circumstances mentioned below.

Extension beyond 120 days is subject to PHA approval to accommodate a Reasonable Accommodation request.

Extensions of Voucher Term [24 CFR 982.303(b)]

The PHA has the authority to grant extensions of search time, to specify the length of an extension, and to determine the circumstances under which extensions will be granted. There is no limit on the number of extensions that OHA can approve. Discretionary policies related to extension and expiration of search time must be described in OHA's administrative plan [24 CFR 982.54].

PHAs must approve additional search time if needed as a reasonable accommodation to make the program accessible to and usable by a person with disabilities. The extension period must be reasonable for the purpose.

The family must be notified in writing of the PHA's decision to approve or deny an extension. The PHA's decision to deny a request for an extension of the voucher term is not subject to informal review [24 CFR 982.554(c)(4)].

PHA Policy

The PHA will approve additional extensions only in the following circumstances:

It is necessary as a reasonable accommodation for a person with disabilities.

It is necessary due to reasons beyond the family's control, as determined by OHA. Following is a list of extenuating circumstances that PHA may consider in making its decision. The presence of these circumstances does not guarantee that an extension will be granted:

Serious illness or death in the family

Other family emergency

Obstacles due to employment

Whether the family has already submitted requests for tenancy approval that were not approved by the PHA

Whether family size or other special circumstances make it difficult to find a suitable unit

Any request for an additional extension must include the reason(s) an additional extension is necessary. The PHA may require the family to provide documentation to support the request or obtain verification from a qualified third party.

All requests for extensions to the voucher term must be made in writing and submitted to the PHA prior to the expiration date of the voucher (or extended term of the voucher).

The PHA will decide whether to approve or deny an extension request within 10 business days of the date the request is received, and will immediately provide the family written notice of its decision.

Suspensions of Voucher Term [24 CFR 982.303(c)]

The PHA must provide for suspension of the initial or any extended term of the voucher from the date the family submits a request for PHA approval of the tenancy until the date PHA notifies the family in writing whether the request has been approved or denied.

Expiration of Voucher Term

Once a family's housing choice voucher term (including any extensions) expires, the family is no longer eligible to search for housing under the program. If the family still wishes to receive assistance, the PHA may require that the family reapply, or may place the family on the waiting list with a new application date but without requiring reapplication. Such a family does not become ineligible for the program on the grounds that it was unable to locate a unit before the voucher expired [HCV GB p. 8-13].

PHA Policy

If an applicant family's voucher term or extension expires before the PHA has approved a tenancy, OHA will require the family to reapply for assistance.

Within 10 business days after the expiration of the voucher term or any extension, the PHA will notify the family in writing that the voucher term has expired and that the family may reapply when the waiting list is open.

Chapter 6.A.

INCOME AND SUBSIDY DETERMINATIONS

[24 CFR Part 5, Subparts E and F; 24 CFR 982]

INTRODUCTION

This chapter is applicable prior to the PHA's HOTMA 102/104 compliance date. After this date, the PHA will follow policies as outlined in Chapter 6.B. of the model policy.

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

A family's income determines eligibility for assistance and is also used to calculate the family's payment and the PHA's subsidy. The PHA will use the policies and methods described in this chapter to ensure that only eligible families receive assistance and that no family pays more or less than its obligation under the regulations. This chapter describes HUD regulations and PHA policies related to these topics in three parts as follows:

- Part I: Annual Income. HUD regulations specify the sources of income to include and exclude to arrive at a family's annual income. These requirements and PHA policies for calculating annual income are found in Part I.
- Part II: Adjusted Income. Once annual income has been established HUD regulations require the PHA to subtract from annual income any of five mandatory deductions for which a family qualifies. These requirements and PHA policies for calculating adjusted income are found in Part II.
- Part III: Calculating Family Share and PHA Subsidy. This part describes the statutory formula for calculating total tenant payment (TTP), the use of utility allowances, and the methodology for determining PHA subsidy and required family payment.

PART I: ANNUAL INCOME

6-I.A. OVERVIEW

The general regulatory definition of *annual income* shown below is from 24 CFR 5.609.

5.609 Annual income.

(a) Annual income means all amounts, monetary or not, which:

- (1) Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
 - (2) Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
 - (3) Which are not specifically excluded in paragraph [5.609(c)].
- (4) Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

In addition to this general definition, HUD regulations establish policies for treating specific types of income and assets. The full texts of those portions of the regulations are provided in exhibits at the end of this chapter as follows:

- Annual Income Inclusions (Exhibit 6-1)
- Annual Income Exclusions (Exhibit 6-2)
- Treatment of Family Assets (Exhibit 6-3)
- The Effect of Welfare Benefit Reduction (Exhibit 6-4)

Sections 6-I. B and 6-I.C discuss general requirements and methods for calculating annual income. The rest of this section describes how each source of income is treated for the purposes of determining annual income. -HUD regulations present income inclusions and exclusions separately [24 CFR 5.609(b) and 24 CFR 5.609(c)]. In this plan, however, the discussions of income inclusions and exclusions are integrated by topic (e.g., all policies affecting earned income are discussed together in section 6-I. D). Verification requirements for annual income are discussed in Chapter 7.A.

6-I.B. HOUSEHOLD COMPOSITION AND INCOME

Income received by all family members must be counted unless specifically excluded by the regulations. It is the responsibility of the head of household to report changes in family composition. The rules on which sources of income are counted vary somewhat by family member. The chart below summarizes how family composition affects income determinations.

Summary of Income Included and Excluded by Person	
Live-in aides	Income from all sources is excluded [24 CFR 5.609(c)(5)].
Foster child or foster adult	Income from all sources is excluded [24 CFR 5.609(c)(2)].
Head, spouse, or cohead Other adult family members	All sources of income not specifically excluded by the regulations are included.
Children under 18 years of age	Employment income is excluded [24 CFR 5.609(c)(1)]. All other sources of income, except those specifically excluded by the regulations, are included.
Full-time students 18 years of age or older (not head, spouse, or cohead)	Employment income above \$480/year is excluded [24 CFR 5.609(c)(11)]. All other sources of income, except those specifically excluded by the regulations, are included.

Temporarily Absent Family Members

The income of family members approved to live in the unit will be counted, even if the family member is temporarily absent from the unit [HCV GB, p. 5-18].

PHA Policy

Generally, an individual who is or is expected to be absent from the assisted unit for 180 consecutive days or less is considered temporarily absent and continues to be considered a family member.

Generally, an individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.

Absent Students

PHA Policy

When someone who has been considered a family member attends school away from home, the person will continue to be considered a family member unless information becomes available to the PHA indicating that the student has established a separate household, or the family declares that the student has established a separate household.

Absences Due to Placement in Foster Care

Children temporarily absent from the home as a result of placement in foster care are considered members of the family [24 CFR 5.403].

PHA Policy

If a child has been placed in foster care, the PHA will verify with the appropriate agency whether and when the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will be counted as a family member.

Absent Head, Spouse, or Cohead

PHA Policy

An employed head, spouse, or cohead absent from the unit more than 180 consecutive days due to employment will continue to be considered a family member.

Family Members Permanently Confined for Medical Reasons

If a family member is confined to a nursing home or hospital on a permanent basis, that person is no longer considered a family member and the income of that person is not counted [HCV GB, p. 5-22].

PHA Policy

The PHA will request verification from a responsible medical professional and will use this determination. If the responsible medical professional cannot provide a determination, the person generally will be considered temporarily absent. The family may present evidence that the family member is confined on a permanent basis and request that the person not be considered a family member.

When an individual who has been counted as a family member is determined permanently absent, the family is eligible for the medical expense deduction only if the remaining head, spouse, or cohead qualifies as an elderly person or a person with disabilities.

Joint Custody of Dependents

PHA Policy

Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 50 percent or more of the time.

When more than one applicant or participant family is claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, school records, or an IRS return showing which family has claimed the child for income tax purposes.

Caretakers for a Child

PHA Policy

The approval of a caretaker is at the owner and PHA's discretion and subject to the owner and PHA's screening criteria. If neither a parent nor a designated guardian remains in a household receiving HCV assistance, the PHA will take the following actions.

- (1) If a responsible agency has determined that another adult is to be brought into the assisted unit to care for a child for an indefinite period, the designated caretaker will not be considered a family member until a determination of custody or legal guardianship is made.
- (2) If a caretaker has assumed responsibility for a child without the involvement of a responsible agency or formal assignment of custody or legal guardianship, the caretaker will be treated as a visitor for 90 days. After the 90 days has elapsed, the caretaker will be considered a family member unless information is provided that would confirm that the caretaker's role is temporary. In such cases the PHA will extend the caretaker's status as an eligible visitor.
- (3) At any time that custody or guardianship legally has been awarded to a caretaker, the housing choice voucher will be transferred to the caretaker.
- (4) During any period that a caretaker is considered a visitor, the income of the caretaker is not counted in annual income and the caretaker does not qualify the family for any deductions from income.

6-I.C. ANTICIPATING ANNUAL INCOME

The PHA is required to count all income “anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date” [24 CFR 5.609(a)(2)].

Policies related to anticipating annual income are provided below.

Basis of Annual Income Projection

The PHA generally will use current circumstances to determine anticipated income for the coming 12-month period. HUD authorizes the PHA to use other than current circumstances to anticipate income when:

- An imminent change in circumstances is expected [HCV GB, p. 5-17]
- It is not feasible to anticipate a level of income over a 12-month period (e.g., seasonal or cyclic income) [24 CFR 5.609(d)]
- The PHA believes that past income is the best available indicator of expected future income [24 CFR 5.609(d)]

PHAs are required to use HUD’s Enterprise Income Verification (EIV) system in its entirety as a third-party source to verify employment and income information, and to reduce administrative subsidy payment errors in accordance with HUD administrative guidance [24 CFR 5.233(a)(2)].

HUD allows PHAs to use tenant-provided documents (pay stubs) dated within 120 days of the date received by the PHA to project income once EIV data has been received in such cases where the family does not dispute the EIV employer data and where the PHA does not determine it is necessary to obtain additional third-party data.

PHA Policy

When EIV is obtained and the family does not dispute the EIV employer data, the PHA will use current tenant-provided documents to project annual income. When the tenant-provided documents are pay stubs, the PHA will make every effort to obtain current and consecutive pay stubs dated within the last ~~120~~60 days.

The PHA will obtain written and/or oral third-party verification in accordance with the verification requirements and policy in Chapter 7 in the following cases:

If EIV or other EIV data is not available,

If the family disputes the accuracy of the EIV employer data, and/or

If the PHA determines additional information is needed.

In such cases, the PHA will review and analyze current data to anticipate annual 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.

The PHA may also accept a statement dated within the appropriate benefit year for fixed income sources.

When the PHA cannot readily anticipate income based upon current circumstances (e.g., in the case of 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.

Known Changes in Income

If the PHA verifies an upcoming increase or decrease in income, annual income will be calculated 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 reexamination. In such a case the PHA would calculate annual income as follows: $(\$8/\text{hour} \times 40 \text{ hours} \times 7 \text{ weeks}) + (\$8.25 \times 40 \text{ hours} \times 45 \text{ weeks})$.

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 require an interim reexamination when the change actually occurs. This requirement will be imposed even if the PHA's policy on reexaminations does not require interim reexaminations for other types of changes.

When tenant-provided third-party documents are used to anticipate annual income, they will be dated **within 120 days of the date received by the PHA. Statements dated within the appropriate benefit year will be accepted for fixed income sources.** ~~the last 60 days of the reexamination interview date.~~

Projecting Income

In HUD's EIV webcast of January 2008, HUD made clear that PHAs are not to use EIV quarterly wages to project annual income.

6-I.D. EARNED INCOME

Types of Earned Income Included in Annual Income

Wages and Related Compensation

The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services is included in annual income [24 CFR 5.609(b)(1)].

PHA Policy

For persons who regularly receive bonuses or commissions, the PHA will verify and then average amounts received for the two years preceding admission or reexamination. If only a one-year history is available, the PHA will use the prior year amounts. In either case the family may provide, and the PHA will consider, a credible justification for not using this history to anticipate future bonuses or commissions. If a new employee has not yet received any bonuses or commissions, the PHA will count only the amount estimated by the employer. The file will be documented appropriately.

Some Types of Military Pay

All regular pay, special pay and allowances of a member of the Armed Forces are counted [24 CFR 5.609(b)(8)] except for the special pay to a family member serving in the Armed Forces who is exposed to hostile fire [24 CFR 5.609(c)(7)].

Types of Earned Income Not Counted in Annual Income

Temporary, Nonrecurring, or Sporadic Income [24 CFR 5.609(c)(9)]

This type of income (including gifts) is not included in annual income. Sporadic income includes temporary payments from the U.S. Census Bureau for employment lasting no longer than 180 -days [Notice PIH 2009-19].

PHA Policy

Sporadic income is income that is not received periodically and cannot be reliably predicted. For example, the income of an individual who works occasionally as a handyman would be considered sporadic if future work could not be anticipated and no historic, stable pattern of income existed.

Children's Earnings

Employment income earned by children (including foster children) under the age of 18 years is not included in annual income [24 CFR 5.609(c)(1)]. (See Eligibility chapter for a definition of *foster children*.)

Certain Earned Income of Full-Time Students

Earnings in excess of \$480 for each full-time student 18 years old or older (except for the head, spouse, or cohead) are not counted [24 CFR 5.609(c)(11)]. To be considered "full-time," a student must be considered "full-time" by an educational institution with a degree or certificate program [HCV GB, p. 5-29].

Income of a Live-in Aide

Income earned by a live-in aide, as defined in [24 CFR 5.403], is not included in annual income [24 CFR 5.609(c)(5)]. (See Eligibility chapter for a full discussion of live-in aides.)

Income Earned under Certain Federal Programs

Income from some federal programs is specifically excluded from consideration as income [24 CFR 5.609(c)(17)], including:

- Payments to volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058)
- Awards under the federal work-study program (20 U.S.C. 1087 uu)
- Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056(f))
- Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d))
- Allowances, earnings, and payments to participants in programs funded under the Workforce Investment Act of 1998 (29 U.S.C. 2931)

Resident Service Stipend

Amounts received under a resident service stipend are not included in annual income. A resident service stipend is a modest amount (not to exceed \$200 per individual per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time [24 CFR 5.600(c)(8)(iv)].

State and Local Employment Training Programs

Incremental earnings and benefits to any family member resulting from participation in qualifying state or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff are excluded from annual income. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the training program [24 CFR 5.609(c)(8)(v)].

PHA Policy

The PHA defines *training program* as “a learning process with goals and objectives, generally having a variety of components, and taking place in a series of sessions over a period of time. It is designed to lead to a higher level of proficiency, and it enhances the individual’s ability to obtain employment. It may have performance standards to measure proficiency. Training may include but is not limited to: (1) classroom training in a specific occupational skill, (2) on-the-job training with wages subsidized by the program, or (3) basic education” [expired Notice PIH 98-2, p. 3].

The PHA defines *incremental earnings and benefits* as the difference between: (1) the total amount of welfare assistance and earnings of a family member prior to enrollment in a training program, and (2) the total amount of welfare assistance and earnings of the family member after enrollment in the program [expired Notice PIH 98-2, pp. 3–4].

In calculating the incremental difference, the PHA will use as the pre-enrollment income the total annualized amount of the family member’s welfare assistance and earnings reported on the family’s most recently completed HUD-50058.

End of participation in a training program must be reported in accordance with the PHA's interim reporting requirements.

HUD-Funded Training Programs

Amounts received under training programs funded in whole or in part by HUD [24 CFR 5.609(c)(8)(i)] are excluded from annual income. Eligible sources of funding for the training include operating subsidy, Section 8 administrative fees, and modernization, Community Development Block Grant (CDBG), HOME program, and other grant funds received from HUD.

PHA Policy

To qualify as a training program, the program must meet the definition of *training program* provided above for state and local employment training programs.

Earned Income Tax Credit

Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26 U.S.C. 32(j)), are excluded from annual income [24 CFR 5.609(c)(17)]. Although many families receive the EITC annually when they file taxes, an EITC can also be received throughout the year. The prorated share of the annual EITC is included in the employee's payroll check.

6-I.E. EARNED INCOME DISALLOWANCE FOR PERSONS WITH DISABILITIES [24 CFR 5.617; Streamlining Final Rule (SFR) Federal Register 3/8/16; Notice -PIH-2023--27]

HOTMA removed the statutory authority for the EID. -The EID is available only to families that are eligible for and participating in the program as of December 31, 2023, or before; no new families may be added on or after January 1, 2024. -If a family is receiving the EID prior to or on the effective date of December 31, 2023, they are entitled to the full amount of the benefit for a full 24-month period. -The policies below are applicable only to such families. No family will still be receiving the EID after December 31, 2025. The EID will be sunset on January 1, 2026, and the PHA policies below will no longer be applicable as of that date or when the last qualifying family exhausts their exclusion period, whichever is sooner.

~~The earned income disallowance (EID) encourages people with disabilities to enter the work force by not including the full value of increases in earned income for a period. The full text of 24 CFR 5.617 is included as Exhibit 6-4 at the end of this chapter. Eligibility criteria and limitations on the disallowance are summarized below.~~

Eligibility

~~This disallowance applies only to individuals in families already participating in the HCV program (not at initial examination). To qualify, the family must experience an increase in annual income that is the result of one of the following events:~~

- ~~• Employment of a family member who is a person with disabilities and who was previously unemployed for one or more years prior to employment. *Previously unemployed* includes a person who annually has earned not more than the minimum wage applicable to the community multiplied by 500 hours. The applicable minimum wage is the federal minimum wage unless there is a higher state or local minimum wage.~~
- ~~• Increased earnings by a family member who is a person with disabilities and whose earnings increase during participation in an economic self-sufficiency or job-training program. A self-sufficiency program includes a program designed to encourage, assist, train, or facilitate the economic independence of HUD-assisted families or to provide work to such families [24 CFR 5.603(b)].~~
- ~~• New employment or increased earnings by a family member who is a person with disabilities and who has received benefits or services under Temporary Assistance for Needy Families (TANF) or any other state program funded under Part A of Title IV of the Social Security Act within the past six months. If the benefits are received in the form of monthly maintenance, there is no minimum amount. If the benefits or services are received in a form other than monthly maintenance, such as one-time payments, wage subsidies, or transportation assistance, the total amount received over the six-month period must be at least \$500.~~

Calculation of the Disallowance

Calculation of the earned income disallowance for an eligible member of a qualified family begins with a comparison of the member's current income with their "baseline income." The family member's baseline income is their income immediately prior to qualifying for the EID. The family member's baseline income remains constant throughout the period that they are participating in the EID.

Calculation Method

Initial 12-Month Exclusion

During the initial exclusion period of 12 consecutive months, the full amount (100 percent) of any increase in income attributable to new employment or increased earnings is excluded.

PHA Policy

The initial EID exclusion period will begin on the first of the month following the date an eligible member of a qualified family is first employed or first experiences an increase in earnings.

Second 12-Month Exclusion

During the second exclusion period of 12 consecutive months, the PHA must exclude at least 50 percent of any increase in income attributable to employment or increased earnings.

PHA Policy

During the second 12-month exclusion period, the PHA will exclude 100 percent of any increase in income attributable to new employment or increased earnings.

Lifetime Limitation

The EID has a two-year (24-month) lifetime maximum. The two-year eligibility period begins at the same time that the initial exclusion period begins and ends 24 months later. During the 24-month period, an individual remains eligible for EID even if they begin to receive assistance from a different housing agency, move between public housing and Section 8 assistance, or have breaks in assistance. —The EID will be sunset on January 1, 2026. -In no circumstances will a family member's exclusion period continue past January 1, 2026.

6-I.F. BUSINESS INCOME [24 CFR 5.609(b)(2)]

Annual income includes “the net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family” [24 CFR 5.609(b)(2)].

Business Expenses

Net income is “gross income less business expense” [HCV GB, p. 5-19].

PHA Policy

To determine business expenses that may be deducted from gross income, the PHA will use current applicable Internal Revenue Service (IRS) rules for determining allowable business expenses [see IRS Publication 535], unless a topic is addressed by HUD regulations or guidance as described below.

Business Expansion

HUD regulations do not permit the PHA to deduct from gross income expenses for business expansion.

PHA Policy

Business expansion is defined as any capital expenditures made to add new business activities, to expand current facilities, or to operate the business in additional locations. For example, purchase of a street sweeper by a construction business for the purpose of adding street cleaning to the services offered by the business would be considered a business expansion. Similarly, the purchase of a property by a hair care business to open at a second location would be considered a business expansion.

Capital Indebtedness

HUD regulations do not permit the PHA to deduct from gross income the amortization of capital indebtedness.

PHA Policy

Capital indebtedness is defined as the principal portion of the payment on a capital asset such as land, buildings, and machinery. This means the PHA will allow as a business expense interest, but not principal, paid on capital indebtedness.

Negative Business Income

If the net income from a business is negative, no business income will be included in annual income; a negative amount will not be used to offset other family income.

Withdrawal of Cash or Assets from a Business

HUD regulations require the PHA to include in annual income the withdrawal of cash or assets from the operation of a business or profession unless the withdrawal reimburses a family member for cash or assets invested in the business by the family.

PHA Policy

Acceptable investments in a business include cash loans and contributions of assets or equipment. For example, if a member of an assisted family provided an up-front loan of \$2,000 to help a business get started, the PHA will not count as income any withdrawals from the business up to the amount of this loan until the loan has been repaid.

Investments do not include the value of labor contributed to the business without compensation.

Co-owned Businesses

PHA Policy

If a business is co-owned with someone outside the family, the family must document the share of the business it owns. If the family's share of the income is lower than its share of ownership, the family must document the reasons for the difference.

6-I.G. ASSETS [24 CFR 5.609(b)(3); 24 CFR 5.603(b)]

Overview

There is no asset limitation for participation in the HCV program. However, HUD requires that the PHA include in annual income the anticipated “interest, dividends, and other net income of any kind from real or personal property” [24 CFR 5.609(b)(3)]. This section discusses how the income from various types of assets is determined. For most types of assets, the PHA must determine the value of the asset in order to compute income from the asset. Therefore, for each asset type, this section discusses:

- How the value of the asset will be determined
- How income from the asset will be calculated

Exhibit 6-1 provides the regulatory requirements for calculating income from assets [24 CFR 5.609(b)(3)] and Exhibit 6-3 provides the regulatory definition of *net family assets*. This section begins with a discussion of general policies related to assets and then provides HUD rules and PHA policies related to each type of asset.

Optional policies for family self-certification of assets are found in Chapter 7.

General Policies

Income from Assets

The PHA generally will use current circumstances to determine both the value of an asset and the anticipated income from the asset. As is true for all sources of income, HUD authorizes the PHA to 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.

PHA Policy

Anytime 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.

Valuing Assets

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.

PHA Policy

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 [HCV GB, p. 5-28].

Lump-Sum Receipts

Payments that are received in a single lump sum, such as inheritances, capital gains, lottery winnings, insurance settlements, and proceeds from the sale of property, are generally considered assets, not income. However, such lump-sum receipts are counted as assets only if they are retained by a family in a form recognizable as an asset (e.g., deposited in a savings or checking account) [RHIIP FAQs]. (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.)

Imputing Income from Assets [24 CFR 5.609(b)(3), Notice PIH 2012-29]

When net family assets are \$5,000 or less, the PHA will include in annual income the actual income anticipated to be derived from the assets. When the family has net family assets in excess of \$5,000, the PHA will include in annual income the greater of (1) the actual income derived from the assets or (2) the imputed income. Imputed income from assets is calculated by multiplying the total cash value of all family assets by an average passbook savings rate as determined by the PHA.

- Note: The HUD field office no longer provides an interest rate for imputed asset income. The “safe harbor” is now for the PHA to establish a passbook rate within 0.75 percent of a national average.
- The PHA must review its passbook rate annually to ensure that it remains within 0.75 percent of the national average.

PHA Policy

The PHA initially set the imputed asset passbook rate at the national rate established by the Federal Deposit Insurance Corporation (FDIC).

The PHA will review the passbook rate annually. The rate will not be adjusted unless the current PHA rate is no longer within 0.75 percent of the national rate. If it is no longer within 0.75 percent of the national rate, the passbook rate will be set at the current national rate.

The effective date of changes to the passbook rate will be determined at the time of the review.

Determining Actual Anticipated Income from Assets

It may or may not be necessary for the PHA to use the value of an asset to compute the actual anticipated income from the asset. When the value is required to compute the anticipated income from an asset, the market value of the asset is used. For example, if the asset is a property for which a family receives rental income, the anticipated income is determined by annualizing the actual monthly rental amount received for the property; it is not based on the property's market value. However, if the asset is a savings account, the anticipated income is determined by multiplying the market value of the account by the interest rate on the account.

Withdrawal of Cash or Liquidation of Investments

Any withdrawal of cash or assets from an investment will be included in income except to the extent that the withdrawal reimburses amounts invested by the family. For example, when a family member retires, the amount received by the family from a retirement investment plan is not counted as income until the family has received payments equal to the amount the family member deposited into the retirement investment plan.

Jointly Owned Assets

The regulation at 24 CFR 5.609(a)(4) specifies that annual income includes "amounts derived (during the 12-month period) from assets to which any member of the family has access."

PHA Policy

If an asset is owned by more than one person and any family member has unrestricted access to the asset, the PHA will count the full value of the asset. A family member has unrestricted access to an asset when they can legally dispose of the asset without the consent of any of the other owners.

If an asset is owned by more than one person, including a family member, but the family member does not have unrestricted access to the asset, the PHA will prorate the asset according to the percentage of ownership. If no percentage is specified or provided for by state or local law, the PHA will prorate the asset evenly among all owners.

Assets Disposed of for Less than Fair Market Value [24 CFR 5.603(b)]

HUD regulations require the PHA to count as a current asset any business or family asset that was disposed of for less than fair market value during the two years prior to the effective date of the examination/reexamination, except as noted below.

Minimum Threshold

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].

PHA Policy

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.

When the two-year period expires, the income assigned to the disposed asset(s) also expires. If the two-year period ends between annual recertifications, the family may request an interim recertification to eliminate consideration of the asset(s).

Assets placed by the family in nonrevocable trusts are considered assets disposed of for less than fair market value except when the assets placed in trust were received through settlements or judgments.

Separation or Divorce

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

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

Assets are not considered disposed of for less than fair market value when the disposition is the result of a foreclosure or bankruptcy sale.

Family Declaration

PHA Policy

Families must sign a declaration form at initial certification and each annual recertification identifying all assets that have been disposed of 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.

Types of Assets

Checking and Savings Accounts

For regular checking accounts and savings accounts, *cash value* has the same meaning as *market value*. If a checking account does not bear interest, the anticipated income from the account is zero.

PHA Policy

In determining the value of checking account and savings accounts, the PHA will use the current balance.

In determining the anticipated income from an interest-bearing checking or savings account, the PHA will multiply the value of the account by the current rate of interest paid on the account.

Investment Accounts Such as Stocks, Bonds, Saving Certificates, and Money Market Funds

Interest or dividends earned by investment accounts are counted 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.

PHA Policy

In determining the market value of an investment account, the PHA will use the value of the account on the most recent investment report.

How anticipated income from an investment account will be calculated depends on whether the rate of return is known.

For assets that are held in an investment account with a known rate of return (e.g., savings certificates), asset income will be calculated based on that known rate (market value multiplied by rate of earnings).

When the anticipated rate of return is not known (e.g., stocks), the PHA will calculate asset income based on the earnings for the most recent reporting period.

Equity in Real Property or Other Capital Investments

Equity (cash value) in a property or other capital asset is the estimated current market value of the asset less the unpaid balance on all loans secured by the asset and reasonable costs (such as broker fees) that would be incurred in selling the asset [HCV GB, p. 5-25].

PHA Policy

In determining the equity, the PHA will determine market value by examining recent sales of at least three properties in the surrounding or similar neighborhood that possess comparable factors that affect market value.

The PHA will first use the payoff amount for the loan (mortgage) as the unpaid balance to calculate equity. If the payoff amount is not available, the PHA will use the basic loan balance information to deduct from the market value in the equity calculation.

Equity in real property and other capital investments is considered in the calculation of asset income **except** for the following types of assets:

- Equity accounts in HUD homeownership programs [24 CFR 5.603(b)]
- The value of a home currently being purchased with assistance under the HCV program Homeownership Option for the first 10 years after the purchase date of the home [24 CFR 5.603(b), Notice PIH 2012-3]
- Equity in owner-occupied cooperatives and manufactured homes in which the family lives [HCV GB, p. 5-25]
- Equity in real property when a family member's main occupation is real estate [HCV GB, p. 5-25]. This real estate is considered a business asset, and income related to this asset will be calculated as described in section 6-I.F.
- Interests in Indian Trust lands [24 CFR 5.603(b)]
- Real property and capital assets that are part of an active business or farming operation [HCV GB, p. 5-25]

The PHA must also deduct from the equity the reasonable costs for converting the asset to cash. Using the formula for calculating equity specified above, the net cash value of real property is the market value minus the balance of the loan (mortgage) minus the expenses to convert to cash [Notice PIH 2012-3].

PHA Policy

For the purposes of calculating expenses to convert to cash for real property, the PHA will use ten percent of the market value of the home.

A family may have real property as an asset in two ways: (1) owning the property itself and (2) holding a mortgage or deed of trust on the property. In the case of a property owned by a family member, the anticipated asset income generally will be in the form of rent or other payment for the use of the property. If the property generates no income, actual anticipated income from the asset will be zero.

In the case of a mortgage or deed of trust held by a family member, the outstanding balance (unpaid principal) is the cash value of the asset. The interest portion only of payments made to the family in accordance with the terms of the mortgage or deed of trust is counted as anticipated asset income.

PHA Policy

In the case of capital investments owned jointly with others not living in a family's unit, a prorated share of the property's cash value will be counted as an asset unless the PHA determines that the family receives no income from the property and is unable to sell or otherwise convert the asset to cash.

Trusts

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).

Revocable Trusts

If any member of a family has the right to withdraw the funds in a trust, the value of the trust is considered an asset [HCV GB, p. 5-25]. Any income earned as a result of investment of trust funds is counted as actual asset income, whether the income is paid to the family or deposited in the trust.

Nonrevocable Trusts

In cases where a trust is not revocable by, or under the control of, any member of a family, the value of the trust fund is not considered an asset. However, any income distributed to the family from such a trust is counted as a periodic payment or a lump-sum receipt, as appropriate [24 CFR 5.603(b)]. (Periodic payments are covered in section 6-I.H. Lump-sum receipts are discussed earlier in this section.)

Retirement Accounts

Company Retirement/Pension Accounts

In order to correctly include or exclude as an asset any amount held in a company retirement or pension account by an employed person, the PHA must know whether the money is accessible before retirement [HCV GB, p. 5-26].

While a family member is employed, only the amount the family member can withdraw without retiring or terminating employment is counted as an asset [HCV GB, p. 5-26].

After a family member retires or terminates employment, any amount distributed to the family member is counted as a periodic payment or a lump-sum receipt, as appropriate [HCV GB, p. 5-26], except to the extent that it represents funds invested in the account by the family member. (For more on periodic payments, see section 6-I.H.) The balance in the account is counted as an asset only if it remains accessible to the family member.

IRA, Keogh, and Similar Retirement Savings Accounts

IRA, Keogh, and similar retirement savings accounts are counted as assets even though early withdrawal would result in a penalty [HCV GB, p. 5-25].

Personal Property

Personal property held as an investment, such as gems, jewelry, coin collections, antique cars, etc., is considered an asset [HCV GB, p. 5-25].

PHA Policy

In determining the value of personal property held as an investment, the PHA will use the family's estimate of the value. The PHA may obtain an appraisal to confirm the value of the asset 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.

Generally, personal property held as an investment generates no income until it is disposed of. If regular income is generated (e.g., income from renting the personal property), the amount that is expected to be earned in the coming year is counted as actual income from the asset.

Necessary items of personal property are not considered assets [24 CFR 5.603(b)].

PHA Policy

Necessary personal property consists of only those items not held as an investment, and may include clothing, furniture, household furnishings, jewelry, and vehicles, including those specially equipped for persons with disabilities.

Life Insurance

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 [HCV GB 5-25]. The cash value is the surrender value. If such a policy earns dividends or interest that the family could elect to receive, the anticipated 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]

All amounts received by a family in the form of federal tax returns or refundable tax credits are excluded from a family's net family assets for 12 months after receipt by the family.

Asset Exclusions [24 CFR 5.603(b)]

24 CFR 5.603(b) lists asset exclusions.

6-I.H. PERIODIC PAYMENTS

Periodic payments are forms of income received on a regular basis. HUD regulations specify periodic payments that are and are not included in annual income.

Periodic Payments Included in Annual Income

- Periodic payments from sources such as social security, unemployment and welfare assistance, annuities, insurance policies, retirement funds, and pensions. However, periodic payments from retirement accounts, annuities, and similar forms of investments are counted only after they exceed the amount contributed by the family [24 CFR 5.609(b)(4) and (b)(3)].
- Disability or death benefits and lottery receipts paid periodically, rather than in a single lump sum [24 CFR 5.609(b)(4) and HCV, p. 5-14].

Lump-Sum Payments for the Delayed Start of a Periodic Payment

Most lump-sums received as a result of delays in processing periodic payments, such as unemployment or welfare assistance, are counted as income. However, lump-sum receipts for the delayed start of periodic social security or supplemental security income (SSI) payments are not counted as income. Additionally, any deferred disability benefits that are received in a lump-sum or in prospective monthly amounts from the Department of Veterans Affairs are to be excluded from annual income [24 CFR 5.609(c)(14)].

PHA Policy

When a delayed-start payment is received and reported during the period in which the PHA is processing an annual reexamination, the PHA will adjust the family share and PHA subsidy retroactively for the period the payment was intended to cover. The family may pay in full any amount due or request to enter into a repayment agreement with the PHA.

Treatment of Overpayment Deductions from Social Security Benefits

The PHA must make a special calculation of annual income when the Social Security Administration (SSA) overpays an individual, resulting in a withholding or deduction from their benefit amount until the overpayment is paid in full. The amount and duration of the withholding will vary depending on the amount of the overpayment and the percent of the benefit rate withheld. Regardless of the amount withheld or the length of the withholding period, the PHA must use the reduced benefit amount after deducting only the amount of the overpayment withholding from the gross benefit amount [Notice PIH 2018-24].

Periodic Payments Excluded from Annual Income

- Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the assisted family, who are unable to live alone) [24 CFR 5.609(c)(2)]. Kinship guardianship assistance payments (Kin-GAP) and other similar guardianship payments are treated the same as foster care payments and are likewise excluded from annual income [Notice PIH 2012-1].

PHA Policy

The PHA will exclude payments for the care of foster children and foster adults only if the care is provided through an official arrangement with a local welfare agency [HCV GB, p. 5-18].

- Amounts paid by a state agency to a family with a member who has a developmental -disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home [24 CFR 5.609(c)(16)].
- Amounts received under the Low-Income Home Energy Assistance Program (42 U.S.C. 1626(c)) [24 CFR 5.609(c)(17)].
- Amounts received under the Childcare and Development Block Grant Act of 1990 (42 U.S.C. 9858q) [24 CFR 5.609(c)(17)].
- Earned Income Tax Credit (EITC) refund payments (26 U.S.C. 32(j)) [24 CFR 5.609(c)(17)]. *Note:* EITC may be paid periodically if the family elects to receive the amount due as part of payroll payments from an employer.
- Lump-sums received as a result of delays in processing Social Security and SSI payments (see section 6-I.H.) [24 CFR 5.609(c)(14)].
- Lump-sums or prospective monthly amounts received as deferred disability benefits from the Department of Veterans Affairs (VA) [24 CFR 5.609(c)(14)].

6-I.I. PAYMENTS IN LIEU OF EARNINGS

Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay, are counted as income [24 CFR 5.609(b)(5)] if they are received either in the form of periodic payments or in the form of a lump-sum amount or prospective monthly amounts for the delayed start of a periodic payment. If they are received in a one-time lump sum (as a settlement, for instance), they are treated as lump-sum receipts [24 CFR 5.609(c)(3)]. (See also the discussion of periodic payments in section 6-I.H and the discussion of lump-sum receipts in section 6-I.G.)

6-I.J. WELFARE ASSISTANCE

Overview

Welfare assistance is counted in annual income. Welfare assistance includes Temporary Assistance for Needy Families (TANF) and any payments to individuals or families based on need that are made under programs funded separately or jointly by federal, state, or local governments [24 CFR 5.603(b)].

Sanctions Resulting in the Reduction of Welfare Benefits [24 CFR 5.615]

The PHA must make a special calculation of annual income when the welfare agency imposes certain sanctions on certain families. The full text of the regulation at 24 CFR 5.615 is provided as Exhibit 6-5. The requirements are summarized below. This rule applies only if a family was receiving HCV assistance at the time the sanction was imposed.

Covered Families

The families covered by 24 CFR 5.615 are those “who receive welfare assistance or other public assistance benefits (‘welfare benefits’) from a State or other public agency (‘welfare agency’) under a program for which Federal, State or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for such assistance” [24 CFR 5.615(b)]

Imputed Income

When a welfare agency imposes a sanction that reduces a family’s welfare income because the family commits fraud or fails to comply with the agency’s economic self-sufficiency program or work activities requirement, the PHA must include in annual income “imputed” welfare income. The PHA must request that the welfare agency provide the reason for the reduction of benefits and the amount of the reduction of benefits. The imputed welfare income is the amount that the benefits were reduced as a result of the sanction.

This requirement does not apply to reductions in welfare benefits: (1) at the expiration of the lifetime or other time limit on the payment of welfare benefits, (2) if a family member is unable to find employment even though the family member has complied with the welfare agency economic self-sufficiency or work activities requirements, or (3) because a family member has not complied with other welfare agency requirements [24 CFR 5.615(b)(2)].

Offsets

The amount of the imputed welfare income is offset by the amount of additional income the family begins to receive after the sanction is imposed. When the additional income equals or exceeds the imputed welfare income, the imputed income is reduced to zero [24 CFR 5.615(c)(4)].

6-I.K. PERIODIC AND DETERMINABLE ALLOWANCES [24 CFR 5.609(b)(7)]

Annual income includes periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing with an assisted family.

Alimony and Child Support

The PHA must count alimony or child support amounts awarded as part of a divorce or separation agreement.

PHA Policy

The PHA will count court-awarded amounts for alimony and child support unless the PHA verifies that: (1) the payments are not being made, and (2) the family has made reasonable efforts to collect amounts due, including filing with courts or agencies responsible for enforcing payments [HCV GB, pp. 5-23 and 5-47].

Families who do not have court-awarded alimony and child support awards are not required to seek a court award and are not required to take independent legal action to obtain collection.

Regular Contributions or Gifts

The PHA must count as income regular monetary and nonmonetary contributions or gifts from persons not residing with an assisted family [24 CFR 5.609(b)(7)]. Temporary, nonrecurring, or sporadic income and gifts are not counted [24 CFR 5.609(c)(9)].

PHA Policy

Examples of regular contributions include: (1) regular payment of a family's bills (e.g., utilities, telephone, rent, credit cards, and car payments), (2) cash or other liquid assets provided to any family member on a regular basis, and (3) "in-kind" contributions such as groceries and clothing provided to a family on a regular basis.

Nonmonetary contributions will be valued at the cost of purchasing the items, as determined by the PHA. For contributions that may vary from month to month (e.g., utility payments), the PHA will include an average amount based upon history.

6-I.L. STUDENT FINANCIAL ASSISTANCE [24 CFR 5.609(b)(9); Notice PIH 2015-21]

In 2005, Congress passed a law (for Section 8 programs only) requiring that certain student financial assistance be included in annual income. Prior to that, the full amount of student financial assistance was excluded. For some students, the full exclusion still applies.

Student Financial Assistance Included in Annual Income [24 CFR 5.609(b)(9); FR 4/10/06; Notice PIH 2015-21]

The regulation requiring the inclusion of certain student financial assistance applies only to students who satisfy all of the following conditions:

- They are enrolled in an institution of higher education, as defined under the Higher Education Act (HEA) of 1965.
- They are seeking or receiving Section 8 assistance on their own—that is, apart from their parents—through the HCV program, the project-based voucher program, or the moderate rehabilitation program.
- They are under 24 years of age **OR** they have no dependent children.

For students who satisfy these three conditions, any financial assistance in excess of tuition and any other required fees and charges received: (1) under the 1965 HEA, (2) from a private source, or (3) from an institution of higher education, as defined under the 1965 HEA, must be included in annual income.

To determine annual income in accordance with the above requirements, the PHA will use the definitions of *dependent child*, *institution of higher education*, and *parents* in section 3-II.E, along with the following definitions [FR 4/10/06, pp. 18148-18150]:

- *Assistance under the Higher Education Act of 1965* includes Pell Grants, Federal Supplement Educational Opportunity Grants, Academic Achievement Incentive Scholarships, State Assistance under the Leveraging Educational Assistance Partnership Program, the Robert G. Byrd Honors Scholarship Program, and Federal Work Study programs.
- *Assistance from private sources* means assistance from nongovernmental sources, including parents, guardians, and other persons not residing with the student in an HCV assisted unit.
- *Tuition and fees* are defined in the same manner in which the Department of Education defines *tuition and fees* [Notice PIH 2015-21].
 - This is the amount of tuition and required fees covering a full academic year most frequently charged to students.
 - The amount represents what a typical student would be charged and may not be the same for all students at an institution.
 - If tuition is charged on a per-credit-hour basis, the average full-time credit hour load for an academic year is used to estimate average tuition.
 - Required fees include all fixed-sum charges that are required of a large proportion of all students. Examples include, but are not limited to, writing and science lab fees and fees specific to the student's major or program (i.e., nursing program).
 - Expenses related to attending an institution of higher education must **not** be included as tuition. Examples include, but are not limited to, room and board, books, supplies, meal plans, transportation and parking, student health insurance plans, and other non-fixed-sum charges.

Student Financial Assistance Excluded from Annual Income [24 CFR 5.609(c)(6)]

Any student financial assistance not subject to inclusion under 24 CFR 5.609(b)(9) is fully excluded from annual income under 24 CFR 5.609(c)(6), whether it is paid directly to the student or to the educational institution the student is attending. This includes any financial assistance received by:

- Students residing with parents who are seeking or receiving Section 8 assistance.
- Students who are enrolled in an educational institution that does **not** meet the 1965 HEA definition of *institution of higher education*.
- Students who are over 23 **AND** have at least one dependent child, as defined in section 3-II.E
- Students who are receiving financial assistance through a governmental program not authorized under the 1965 HEA.

6-I.M. ADDITIONAL EXCLUSIONS FROM ANNUAL INCOME

Other exclusions contained in 24 CFR 5.609(c) that have not been discussed earlier in this chapter include the following:

- Reimbursement of medical expenses [24 CFR 5.609(c)(4)]
- Amounts received by participants in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred and which are made solely to allow participation in a specific program [24 CFR 5.609(c)(8)(iii)]
- Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS) [(24 CFR 5.609(c)(8)(ii)]
- Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era [24 CFR 5.609(c)(10)]
- Adoption assistance payments in excess of \$480 per adopted child [24 CFR 5.609(c)(12)]
- Refunds or rebates on property taxes paid on the dwelling unit [24 CFR 5.609(c)(15)]
- Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home [24 CFR 5.609(c)(16)]
- Amounts specifically excluded by any other federal statute [24 CFR 5.609(c)(17), FR Notice 5/20/14]. HUD publishes an updated list of these exclusions periodically. It includes:
 - (a) The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 2017 (b))
 - ~~(a)~~(b) Benefits under Section 1780 of the School Lunch Act and Child Nutrition Act of 1966, including WIC
 - ~~(b)~~(c) Payments to volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058)
 - (d) Payments received under the Alaska Native Claims Settlement Act (43 U.S.C. 1626(c))
 - (e) Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes (25 U.S.C. 459e)
 - (f) Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program (42 U.S.C. 8624(f))
 - (g) Payments received under programs funded in whole or in part under the Workforce Investment Act of 1998 (29 U.S.C. 2931)
 - (h) Deferred disability benefits from the Department of Veterans Affairs, whether received as a lump sum or in monthly prospective amounts.
 - (i) Income derived from the disposition of funds to the Grand River Band of Ottawa Indians (Pub. L. 94-540, 90 Stat. 2503-04)

- (j) Payments, funds, or distributions authorized, established, or directed by the Seneca Nation Settlement Act of 1990 (25 U.S.C. 1774f(b))
- (k) A lump sum or periodic payment received by an individual Indian pursuant to the Class Action Settlement Agreement in the United States District Court case entitled *Elouise Cobell et al. v. Ken Salazar et al.*, for a period of one year from the time of receipt of that payment as provided in the Claims Resolution Act of 2010
- (l) The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U. S. Claims Court, the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands (25 U.S.C. 1407-1408)
- (m) Benefits under the Indian Veterans Housing Opportunity Act of 2010 (only applies to Native American housing programs)
- (n) Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056(f))
- (o) Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in *In Re Agent Orange* product liability litigation, M.D.L. No. 381 (E.D.N.Y.)
- (p) Payments received under 38 U.S.C. 1833(c) to children of Vietnam veterans born with spinal bifida, children of women Vietnam veterans born with certain birth defects, and children of certain Korean service veterans born with spinal bifida
- (q) Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721)
- (r) The value of any childcare provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Childcare and Development Block Grant Act of 1990 (42 U.S.C. 9858q)
- (s) Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26 U.S.C. 32(j))
- (t) Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation (Pub. L. 95-433)
- (u) Amounts of scholarships funded under Title IV of the Higher Education Act of 1965j, including awards under federal work-study programs or under the Bureau of Indian Affairs student assistance programs (20 U.S.C. 1087uu). For Section 8 programs, the exception found in § 237 of Public Law 109–249 applies and requires that the amount of financial assistance in excess of tuition and mandatory fees shall be considered income in accordance with the provisions codified at 24 CFR 5.609(b)(9), except for those persons with disabilities as defined by 42 U.S.C. 1437a(b)(3)(E) (Pub. L. 109–249) (See Section 6-I.L. for exceptions.)
- (v) Allowances, earnings and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d))

- (b) (w) Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act (42 U.S.C. 10602)
- (c) (x) Any amounts in an "individual development account" as provided by the Assets for Independence Act, as amended in 2002
- (d) (y) Payments made from the proceeds of Indian tribal trust cases as described in Notice PIH 2013-30, "Exclusion from Income of Payments under Recent Tribal Trust Settlements" (25 U.S.C. 117b(a))
- (e) (z) Major disaster and emergency assistance received under the Robert T. Stafford Disaster Relief and Emergency Assistance Act and comparable disaster assistance provided by states, local governments, and disaster assistance organizations
- (aa) Distributions from an ABLE account, and actual or imputed interest on the ABLE account balance

PART II: ADJUSTED INCOME

6-II.A. INTRODUCTION

Overview

HUD regulations require PHAs to deduct from annual income any of five mandatory deductions for which a family qualifies. The resulting amount is the family's adjusted income. Mandatory deductions are found in 24 CFR 5.611.

5.611(a) Mandatory deductions. In determining adjusted income, the responsible entity [PHA] must deduct the following amounts from annual income:

- (1) \$480 for each dependent;
- (2) \$400 for any elderly family or disabled family;
- (3) The sum of the following, to the extent the sum exceeds three percent of annual income:
 - (i) Unreimbursed medical 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. This deduction may not exceed the earned income received by family members who are 18 years of age or older and who are able to work because of such attendant care or auxiliary apparatus; 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

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 nonschool periods and cyclical medical expenses), the PHA will estimate costs based on historic data and known future costs.

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.

6-II.B. DEPENDENT DEDUCTION

An allowance of \$480 is deducted from annual income for each dependent [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-II.C. ELDERLY OR DISABLED FAMILY DEDUCTION

A single deduction of \$400 is taken for any elderly or disabled family [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-II.D. MEDICAL EXPENSES DEDUCTION [24 CFR 5.611(a)(3)(i)]

Unreimbursed medical expenses may be deducted to the extent that, in combination with any disability assistance expenses, they exceed three percent of annual income.

The medical expense 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 medical expense deduction, the medical expenses of all family members are counted [VG, p. 28].

Definition of Medical Expenses

HUD regulations define *medical expenses* at 24 CFR 5.603(b) to mean “medical expenses, including medical insurance premiums, that are anticipated during the period for which annual income is computed, and that are not covered by insurance.”

PHA Policy

The most current IRS Publication 502, *Medical and Dental Expenses*, will be used as a reference to determine the costs that qualify as medical expenses.

Summary of Allowable Medical Expenses from IRS Publication 502	
Services of medical professionals	Psychiatric treatment
Surgery and medical procedures that are necessary, legal, not cosmetic.	Ambulance services and some costs of transportation related to medical expenses.
Services of medical facilities	The cost and care of necessary equipment related to a medical condition (e.g., eyeglasses/lenses, hearing aids, crutches, and artificial teeth)
Hospitalization, long-term care, and in-home nursing services	Cost and continuing care of necessary service animals
Prescription medicines and insulin, but <u>not</u> nonprescription medicines even if recommended by a doctor.	Medical insurance premiums or the cost of a health maintenance organization (HMO)
Improvements to housing directly related to medical needs (e.g., ramps for a wheelchair, handrails)	
Substance abuse treatment programs	
Note: This chart provides a summary of eligible medical expenses only. Detailed information is provided in IRS Publication 502. Medical expenses are considered only to the extent they are not reimbursed by insurance or some other source.	

Families That Qualify for Both Medical and Disability Assistance Expenses

PHA Policy

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 medical or disability assistance expenses, the PHA will consider them medical expenses unless it is clear that the expenses are incurred exclusively to enable a person with disabilities to work.

6-II.E. DISABILITY ASSISTANCE EXPENSES DEDUCTION [24 CFR 5.603(b) and 24 CFR 5.611(a)(3)(ii)]

Reasonable expenses for attendant care and auxiliary apparatus for a disabled family member may be deducted if they: (1) are necessary to enable a family member 18 years or older to work, (2) are not paid to a family member or reimbursed by an outside source, (3) in combination with any medical expenses, exceed three percent of annual income, and (4) do not exceed the earned income received by the family member who is enabled to work.

Earned Income Limit on the Disability Assistance Expense Deduction

A family can qualify for the disability assistance expense deduction only if at least one family member (who may be the person with disabilities) is enabled to work [24 CFR 5.603(b)].

The disability expense deduction is capped by the amount of “earned income received by family members who are 18 years of age or older and who are able to work” because of the expense [24 CFR 5.611(a)(3)(ii)]. The earned income used for this purpose is the amount verified before any ~~earned income disallowances or~~ income exclusions are applied.

PHA Policy

The family must identify the family members enabled to work as a result of the disability assistance expenses. In evaluating the family’s request, the PHA will consider factors such as how the work schedule of the relevant family members relates to the hours of care provided, the time required for transportation, the relationship of the family members to the person with disabilities, and any special needs of the person with disabilities that might determine which family members are enabled to work.

When the PHA determines that the disability assistance expenses enable more than one family member to work, the expenses will be capped by the sum of the family members’ incomes.

Eligible Disability Expenses

Examples of auxiliary apparatus are provided in the *HCV Guidebook* as follows: “Auxiliary apparatus are items such as wheelchairs, ramps, adaptations to vehicles, or special equipment to enable a blind person to read or type, but only if these items are directly related to permitting the disabled person or other family member to work” [HCV GB, p. 5-30].

HUD advises PHAs to further define and describe auxiliary apparatus [VG, p. 30].

Eligible Auxiliary Apparatus

PHA Policy

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.

Eligible Attendant Care

The family determines the type of attendant care that is appropriate for the person with disabilities.

PHA Policy

Attendant care includes, but is not limited to, reasonable costs for home medical care, nursing services, in-home or center-based care services, interpreters for persons with hearing impairments, and readers for persons with visual disabilities.

Attendant care expenses will be included for the period that the person enabled to work is employed plus reasonable transportation time. The cost of general housekeeping and personal services is not an eligible attendant care expense. However, if the person enabled to work is the person with disabilities, personal services necessary to enable the person with disabilities to work are eligible.

If the care attendant also provides other services to the family, the PHA will prorate the cost and allow only that portion of the expenses attributable to attendant care that enables a family member to work. For example, if the care provider also cares for a child who is not the person with disabilities, the cost of care must be prorated. Unless otherwise specified by the care provider, the calculation will be based upon the number of hours spent in each activity and/or the number of persons under care.

Payments to Family Members

No disability assistance expenses may be deducted for payments to a member of an assisted family [24 CFR 5.603(b)]. However, expenses paid to a relative who is not a member of the assisted family may be deducted if they are not reimbursed by an outside source.

Necessary and Reasonable Expenses

The family determines the type of care or auxiliary apparatus to be provided and must describe how the expenses enable a family member to work. The family must certify that the disability assistance expenses are necessary and are not paid or reimbursed by any other source.

PHA Policy

The PHA determines the reasonableness of the expenses based on typical costs of care or apparatus in the locality. To establish typical costs, the PHA will collect information from organizations that provide services and support to persons with disabilities. A family may present, and the PHA will consider, the family's justification for costs that exceed typical costs in the area.

Families That Qualify for Both Medical and Disability Assistance Expenses

PHA Policy

This policy applies only to families in which the head or spouse is 62 or older or is a person with disabilities.

When expenses anticipated by a family could be defined as either medical or disability assistance expenses, the PHA will consider them medical expenses unless it is clear that the expenses are incurred exclusively to enable a person with disabilities to work.

6-II.F. CHILDCARE EXPENSE DEDUCTION

HUD defines *childcare expenses* at 24 CFR 5.603(b) as “amounts anticipated to be paid by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further his or her education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for childcare. In the case of childcare necessary to permit employment, the amount deducted shall not exceed the amount of employment income that is included in annual income.”

Clarifying the Meaning of *Child* for This Deduction

Childcare expenses do not include child support payments made to another on behalf of a minor who is not living in an assisted family’s household [VG, p. 26]. However, childcare expenses for foster children that are living in the assisted family’s household are included when determining the family’s childcare expenses [HCV GB, p. 5-29].

Qualifying for the Deduction

Determining Who Is Enabled to Pursue an Eligible Activity

PHA Policy

The family must identify the family member(s) enabled to pursue an eligible activity. The term *eligible activity* in this section means any of the activities that may make the family eligible for a childcare deduction (seeking work, pursuing an education, or being gainfully employed).

In evaluating the family’s request, the PHA will consider factors such as how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.

Seeking Work

PHA Policy

If the childcare expense being claimed is to enable a family member to seek employment, the family must provide evidence of the family member’s efforts to obtain employment at each reexamination. The deduction may be reduced or denied if the family member’s job search efforts are not commensurate with the childcare expense being allowed by the PHA.

Furthering Education

PHA Policy

If the childcare expense being claimed is to enable a family member to further their education, the member must be enrolled in school (academic or vocational) or participating in a formal training program. The family member is not required to be a full-time student, but the time spent in educational activities must be commensurate with the childcare claimed.

Being Gainfully Employed

PHA Policy

If the childcare expense being claimed is to enable a family member to be gainfully employed, the family must provide evidence of the family member's employment during the time that childcare is being provided. Gainful employment is any legal work activity (full- or part-time) for which a family member is compensated.

Earned Income Limit on Childcare Expense Deduction

When a family member looks for work or furthers their education, there is no cap on the amount that may be deducted for childcare – although the care must still be necessary and reasonable. However, when childcare enables a family member to work, the deduction is capped by “the amount of employment income that is included in annual income” [24 CFR 5.603(b)].

The earned income used for this purpose is the amount of earned income verified after any ~~earned income disallowances or~~ income exclusions are applied.

When the person who is enabled to work is a ~~person with disabilities who receives the earned income disallowance (EID) or~~ a full-time student whose earned income above \$480 is excluded, childcare costs related to enabling a family member to work may not exceed the portion of the person's earned income that actually is included in annual income. ~~For example, if a family member who qualifies for the EID makes \$15,000 but because of the EID only \$5,000 is included in annual income, child care expenses are limited to \$5,000.~~

The PHA must not limit the deduction to the least expensive type of childcare. If the care allows the family to pursue more than one eligible activity, including work, the cap is calculated in proportion to the amount of time spent working [HCV GB, p. 5-30].

PHA Policy

When the childcare expense being claimed is to enable a family member to work, only one family member's income will be considered for a given period of time. When more than one family member works during a given period, the PHA generally will limit allowable childcare expenses to the earned income of the lowest-paid member. The family may provide information that supports a request to designate another family member as the person enabled to work.

Eligible Childcare Expenses

The type of care to be provided is determined by the assisted family. The PHA may not refuse to give a family the childcare expense deduction because there is an adult family member in the household that may be available to provide childcare [VG, p. 26].

Allowable Childcare Activities

PHA Policy

For school-age children, costs attributable to public or private school activities during standard school hours are not considered. Expenses incurred for supervised activities after school or during school holidays (e.g., summer day camp, after-school sports league) are allowable forms of childcare.

The costs of general housekeeping and personal services are not eligible. Likewise, childcare expenses paid to a family member who lives in the family's unit are not eligible; however, payments for childcare to relatives who do not live in the unit are eligible.

If a childcare provider also renders other services to a family or childcare is used to enable a family member to conduct activities that are not eligible for consideration, the PHA will prorate the costs and allow only that portion of the expenses that is attributable to childcare for eligible activities. For example, if the care provider also cares for a child with disabilities who is 13 or older, the cost of care will be prorated. Unless otherwise specified by the childcare provider, the calculation will be based upon the number of hours spent in each activity and/or the number of persons under care.

Necessary and Reasonable Costs

Childcare expenses will be considered necessary if: (1) a family adequately explains how the care enables a family member to work, actively seek employment, or further their education, and (2) the family certifies, and the childcare provider verifies, that the expenses are not paid or reimbursed by any other source.

PHA Policy

Childcare expenses will be considered for the time required for the eligible activity plus reasonable transportation time. For childcare that enables a family member to go to school, the time allowed may include not more than one study hour for each hour spent in class.

To establish the reasonableness of childcare costs, the PHA will use the schedule of childcare costs from a qualified local entity that either subsidizes childcare costs or licenses childcare providers. Families may present, and the PHA will consider, justification for costs that exceed typical costs in the area.

PART III: CALCULATING FAMILY SHARE AND PHA SUBSIDY

6-III.A. OVERVIEW OF RENT AND SUBSIDY CALCULATIONS

-TTP Formula [24 CFR 5.628]

HUD regulations specify the formula for calculating the total tenant payment (TTP) for an assisted family. TTP is the highest of the following amounts, rounded to the nearest dollar:

- 30 percent of the family's monthly adjusted income (adjusted income is defined in Part II)
- 10 percent of the family's monthly gross income (annual income, as defined in Part I, divided by 12)
- The welfare rent (in as-paid states only)
- A minimum rent between \$0 and \$50 that is established by the PHA.

The PHA has authority to suspend and exempt families from minimum rent when a financial hardship exists, as defined in section 6-III.B.

The amount that a family pays for rent and utilities (the family share) will never be less than the family's TTP but may be greater than the TTP depending on the rent charged for the unit the family selects.

Welfare Rent [24 CFR 5.628]

PHA Policy

Welfare rent does not apply in this locality.

Minimum Rent [24 CFR 5.630]

PHA Policy

The minimum rent for this locality is \$0.

Family Share [24 CFR 982.305(a)(5)]

If a family chooses a unit with a gross rent (rent to owner plus an allowance for tenant-paid utilities) that exceeds the PHA's applicable payment standard: (1) the family will pay more than the TTP, and (2) at initial occupancy the PHA may not approve the tenancy if it would require the family share to exceed 40 percent of the family's monthly adjusted income. ~~The income used for this determination must have been verified no earlier than 60 days before the family's voucher was issued.~~ (For a discussion of the application of payment standards, see section 6-III.C.)

PHA Subsidy [24 CFR 982.505(b)]

The PHA will pay a monthly housing assistance payment (HAP) for a family that is equal to the lower of (1) the applicable payment standard for the family minus the family's TTP or (2) the gross rent for the family's unit minus the TTP. (For a discussion of the application of payment standards, see section 6-III.C.)

Utility Reimbursement [24 CFR 982.514(b); 982.514(c)]

When the PHA subsidy for a family exceeds the rent to owner, the family is due a utility reimbursement. HUD permits the PHA to pay the reimbursement to the family or directly to the utility provider.

PHA Policy

The PHA will make utility reimbursements to the family.

The PHA may make all utility reimbursement payments to qualifying families on a monthly basis or may make quarterly payments when the monthly reimbursement amount is \$15.00 or less. Reimbursements must be made once per calendar-year quarter and must be prorated if the family leaves the program in advance of its next quarterly reimbursement. The PHA must also adopt hardship policies for families for whom receiving quarterly reimbursement would create a financial hardship.

PHA Policy

The PHA will issue all utility reimbursements monthly.

6-III.B. FINANCIAL HARDSHIPS AFFECTING MINIMUM RENT [24 CFR 5.630]

PHA Policy

The financial hardship rules described below do not apply in this jurisdiction because the PHA has established a minimum rent of \$0.

Overview

If the PHA establishes a minimum rent greater than zero, the PHA must grant an exemption from the minimum rent if a family is unable to pay the minimum rent because of financial hardship.

The financial hardship exemption applies only to families required to pay the minimum rent. If a family's TTP is higher than the minimum rent, the family is not eligible for a hardship exemption. If the PHA determines that a hardship exists, the family share is the highest of the remaining components of the family's calculated TTP.

HUD-Defined Financial Hardship

Financial hardship includes the following situations:

- (1) The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program. This includes a family member who is a noncitizen lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996.

PHA Policy

A hardship will be considered to exist only if the loss of eligibility has an impact on the family's ability to pay the minimum rent.

For a family waiting for a determination of eligibility, the hardship period will end as of the first of the month following: (1) implementation of assistance, if approved, or (2) the decision to deny assistance. A family whose request for assistance is denied may request a hardship exemption based upon one of the other allowable hardship circumstances.

- (2) The family would be evicted because it is unable to pay the minimum rent.

PHA Policy

For a family to qualify under this provision, the cause of the potential eviction must be the family's failure to pay rent to the owner or tenant-paid utilities.

- (3) Family income has decreased because of changed family circumstances, including the loss of employment.

(4) A death has occurred in the family.

~~(4)~~ -PHA Policy

In order to qualify under this provision, a family must describe how the death has created a financial hardship (e.g., because of funeral-related expenses or the loss of the family member's income).

(5) The family has experienced other circumstances determined by the PHA.

~~(5)~~ -PHA Policy

The PHA has not established any additional hardship criteria.

Implementation of Hardship Exemption

Determination of Hardship

When a family requests a financial hardship exemption, the PHA must suspend the minimum rent requirement beginning the first of the month following the family's request.

The PHA then determines whether the financial hardship exists and whether the hardship is temporary or long-term.

PHA Policy

The PHA defines temporary hardship as a hardship expected to last 90 days or less. Long-term hardship is defined as a hardship expected to last more than 90 days.

When the minimum rent is suspended, the family share reverts to the highest of the remaining components of the calculated TTP. The example below demonstrates the effect of the minimum rent exemption.

Example: Impact of Minimum Rent Exemption	
Assume the PHA has established a minimum rent of \$50.	
Family Share – No Hardship	Family Share – With Hardship
\$030% of monthly adjusted income	\$030% of monthly adjusted income
\$1510% of monthly gross income	\$1510% of monthly gross income
N/A Welfare rent	N/A Welfare rent
\$50 Minimum rent	\$50 Minimum rent
Minimum rent applies. TTP = \$50	Hardship exemption granted. TTP = \$15

PHA Policy

To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the hardship has affected the family's ability to pay the minimum rent.

The PHA will make the determination of hardship within 30 calendar days.

No Financial Hardship

If the PHA determines there is no financial hardship, the PHA will reinstate the minimum rent and require the family to repay the amounts suspended.

PHA Policy

The PHA will require the family to repay the suspended amount within 30 calendar days of the PHA's notice that a hardship exemption has not been granted.

Temporary Hardship

If the PHA determines that a qualifying financial hardship is temporary, the PHA must suspend the minimum rent for the 90-day period beginning the first of the month following the date of the family's request for a hardship exemption.

At the end of the 90-day suspension period, the family must resume payment of the minimum rent and must repay the PHA the amounts suspended. HUD requires the PHA to offer a reasonable repayment agreement, on terms and conditions established by the PHA. The PHA also may determine that circumstances have changed and the hardship is now a long-term hardship.

PHA Policy

The PHA will enter into a repayment agreement in accordance with the procedures found in Chapter 16 of this plan.

Long-Term Hardship

If the PHA determines that the financial hardship is long-term, the PHA must exempt the family from the minimum rent requirement for so long as the hardship continues. The exemption will apply from the first of the month following the family's request until the end of the qualifying hardship. When the financial hardship has been determined to be long-term, the family is not required to repay the minimum rent.

PHA Policy

The hardship period ends when any of the following circumstances apply:

- (+) (1) At an interim or annual reexamination, the family's calculated TTP is greater than the minimum rent.
- (-) (2) For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost. For example, if a hardship is approved because a family no longer receives a \$60/month child support payment, the hardship will continue to exist until the family receives at least \$60/month in income from another source or once again begins to receive the child support.
- (-) (3) For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.

6-III.C. APPLYING PAYMENT STANDARDS [24 CFR 982.505(c) and Notice PIH 2024-34]

Overview

The PHA's schedule of payment standards is used to calculate housing assistance payments for HCV families. This section covers the application of the PHA's payment standards. The establishment and revision of the PHA's payment standard schedule are covered in Chapter 16.

Payment standard is defined as "the maximum monthly assistance payment for a family assisted in the voucher program (before deducting the total tenant payment by the family)" [24 CFR 982.4(b)].

The payment standard for a family is the lower of (1) the payment standard for the family unit size, which is defined as the appropriate number of bedrooms for the family under the PHA's subsidy standards [24 CFR 982.4(b)], or (2) the payment standard for the size of the dwelling unit rented by the family [24 CFR 982.505(c)(1)].

If the PHA has established an exception payment standard for a designated part of ~~an a-zip-code area or~~ FMR area in accordance with 24 CFR 982.503 and a family's unit is located in the designated exception area, the PHA must use the appropriate payment standard for the exception area [24 CFR ~~24CFR~~ 982.505(c)(2)].

The PHA is required to pay a monthly housing assistance payment (HAP) for a family that is the lower of (1) the payment standard for the family minus the family's TTP or (2) the gross rent for the family's unit minus the TTP.

If during the term of the HAP contract for a family's unit, the owner lowers the rent, the PHA will recalculate the HAP using the lower of the initial payment standard or the gross rent for the unit [HCV GB, p. 7-8].

Changes in Payment Standards

When the PHA revises its payment standards during the term of the HAP contract for a family's unit, it will apply the new payment standards in accordance with HUD regulations. ~~Regulations governing increases and decreases in the payment standard have changed, with a required compliance date of December 3, 2024.~~

Decreases [24 CFR 982.505(c)(3) and Notice PIH 2024-34]

~~For new HAP contracts, the PHA applies the payment standard in effect at the time of HAP contract execution.~~

~~The PHA must administer decreases in the payment standard amount for the family in accordance with the PHA policy as described in the administrative plan and apply the policy consistently to all families.~~

~~If a PHA changes its payment standard schedule, resulting in a lower payment standard amount, during the term of a HAP contract, the PHA is not required to reduce the payment standard used to calculate subsidy for families under HAP contract as long as the HAP contract remains in effect.~~

Changes effective 12/2/24 and earlier:- 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 the effective ~~date~~^{date} of the family's second regular reexamination following the effective date of the decrease in the payment standard amount.

Changes effective 12/3/24 and later: 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).

At that point, the PHA may either reduce the payment standard to the current amount in effect on the PHA's payment standard schedule or may reduce the payment standard to another amount that is higher than the normally applicable amount on the schedule. -The PHA may also establish different policies for designated areas within their jurisdiction (e.g., different zip code areas).

In any case, the PHA must provide the family with at least 12 months' notice that the payment standard is being reduced before the effective date of the change. -In the written notice, the PHA must state 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. -The PHA's policy on decreases in the payment standard during the term of the HAP contract apply to all families under HAP contract at the time of the effective date of the decrease in the payment standard within the designated area.

PHA Policy

If a PHA changes its payment standard schedule resulting in a lower payment standard amount, during the term of a HAP contract, the PHA will not reduce the payment standard used to calculate subsidy for families under HAP contract as long as the HAP contract remains in effect.

The PHA will not establish different policies for decreases in the payment standard for designated areas within their jurisdiction.

Increases [(24 CFR 982.505(c)(4) and Notice PIH 2024-34]

For new HAP contracts, the PHA applies the payment standard in effect at the time of HAP contract execution.

Changes effective 12/2/24 and earlier: -If the payment standard is increased during the term of the HAP contract, the increased payment standard will be used to calculate the monthly housing assistance payment for the family beginning on the effective date of the family's first regular reexamination on or after the effective date of the increase in the payment standard.

Families requiring or requesting interim reexaminations will not have their HAP payments calculated using the higher payment standard until their next annual reexamination [HCV GB, p. 7-8].

Changes effective 12/3/24 and later:- If the payment standard is increased during the term of the HAP contract, the increased payment standard will be applied no later than the earliest of:

- The effective date of an increase in the gross rent that would result in an increase in the family share.
- The family's first regular or interim reexamination; or
- One year following the effective date of the increase in the payment standard amount.

The PHA may adopt a policy to apply a payment standard increase at any time earlier than the date calculated above as long as the policy is included in the administrative plan and applied consistently to all families [24 CFR 982.505(c)(5)].

PHA Policy

The PHA will not adopt payment standard increases earlier than the date required by the regulations.

Changes in Family Unit Size (Voucher Size)- [24 CFR 982.505(c)(6) and Notice PIH 2024-34]

Changes effective 12/2/24 and earlier: Irrespective of any increase or decrease in the payment standard, if the family unit size increases or decreases during the HAP contract term, the new family unit size must be used to determine the payment standard for the family beginning at the family's first regular reexamination following the change in family unit size.

Changes effective 12/3/24 and later:- Irrespective of any increase or decrease in the payment standard, if the family unit size increases or decreases during the HAP contract term, the new family unit size ~~may must~~ be used to determine the payment standard **immediately but no later than 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.

Moves

If the family moves to a new unit, or a new HAP contract is executed due to changes in the lease (even if the family remains in place) the current payment standard applicable to the family will be used when the new HAP contract is processed.

Reasonable Accommodation- [24 CFR 982.503(d)(5)]

If a family requires a higher payment standard as a reasonable accommodation for a family member who is a person with disabilities, the PHA is allowed to establish a higher payment standard for the family of not more than 120 percent of the published FMR **without -HUD approval or prior notification to HUD.-** A PHA may establish a payment standard greater than 120 percent of the applicable FMR as a reasonable accommodation in accordance with 24 CFR part 8, after requesting and receiving HUD approval. -See Chapter 16 for more information.

6-III.D. APPLYING UTILITY ALLOWANCES [24 CFR 982.517]

Overview

A PHA-established utility allowance schedule is used in determining family share and PHA subsidy. A family's utility allowance is determined by the size of dwelling unit leased by a family or the voucher unit size for which the family qualifies using PHA subsidy standards, whichever is the lowest of the two. See Chapter 5 for information on the PHA's subsidy standards.

For policies on establishing and updating utility allowances, see Chapter 16.

Flat Fees [24 CFR 982.517(b)(2)(iii)]

The PHA may base its utility allowance payments on actual flat fees charged by an owner for utilities that are billed directly by the owner, but only if the flat fee charged by the owner is no greater than the PHA's applicable utility allowance for the utilities covered by the fee. If the owner charges a flat fee for some but not all utilities, the PHA must pay a separate allowance for any tenant-paid utilities not covered in the flat fee.

PHA Policy

The PHA will not base utility allowance payments on flat fees charged by the owner.

PBV Developments [24 CFR 982.517(b)(2)(iv)]

If a tenant-based voucher holder resides in a project with project-based voucher (PBV) units and the PBV units use a site-specific utility allowance in accordance with PBV regulations, the PHA must use the project-specific utility allowance schedule.

Reasonable Accommodation and Individual Relief

On request from a family that includes a person with disabilities, the PHA must approve a utility allowance which is higher than the applicable amount on the utility allowance schedule if a higher utility allowance is needed as a reasonable accommodation to make the program

accessible and usable by the family member with a disability [24 CFR 982.517(e)]. (See Chapter 2 for policies regarding the request and approval of reasonable accommodations.)

Further, the PHA may grant requests for individual relief from charges in excess of the utility allowance on reasonable grounds, such as special factors not within control of the resident, as the PHA deems appropriate. -The family must request the higher allowance and provide the PHA an explanation of the need for individual relief and an explanation about the amount of additional allowance required [see HCV GB, p.18-8].

PHAs should develop criteria for granting individual relief, notify residents about the availability of individual relief, and notify participants about the availability of individual relief programs (sometimes referred to as “Medical Baseline discounts”) offered by the local utility company.

~~HCV program regulations require a PHA to approve a utility allowance amount higher than shown on the PHA’s schedule if a higher allowance is needed as reasonable accommodation for a family member with a disability. For example, if a family member with a disability requires such an accommodation, the PHA will approve an allowance for air conditioning, even if the PHA has determined that an allowance for air conditioning generally is not needed.~~

PHA Policy

The family must request the higher allowance and provide the PHA with information about the amount of additional allowance required.

The PHA will consider the following criteria as valid reasons for granting individual relief:

- The family’s consumption was mistakenly portrayed as excessive due to defects in the meter or errors in the meter reading.
- The excessive consumption is caused by a characteristic of the unit or owner-supplied equipment that is beyond the family’s control, such as a particularly inefficient refrigerator or inadequate insulation. -The allowance should be adjusted to reflect the higher consumption needs associated with the unit until the situation is remedied. -The resident should be granted individual relief until the allowance is adjusted.
- The excessive consumption is due to special needs of the family that are beyond their control, such as the need for specialized equipment in the case of a family member who is ill, elderly, or who has a disability.

In determining the amount of the reasonable accommodation or individual relief, the PHA will allow a reasonable measure of additional usage as necessary. -To arrive at the amount of additional utility cost of specific equipment, the family may provide information from the manufacturer of the equipment, or the family or PHA may conduct an internet search for an estimate of usage or additional monthly cost.

Information on reasonable accommodation and individual relief for charges in excess of the utility allowance will be provided to all families at admission as part of the information on payment standards and utility allowances in the briefing packet. -The _____PHA will also provide information on utility relief programs or medical discounts

(sometimes referred to as “Medical Baseline discounts”) that may be available through local utility providers.

At its discretion, the PHA may reevaluate the need for the increased utility allowance at any regular reexamination.

If the excessive consumption is caused by a characteristic of the unit or PHA-supplied equipment that is beyond the family’s control, such as a particularly inefficient refrigerator or inadequate insulation, the individual relief to the resident will cease when the situation is remedied.

Utility Allowance Revisions

At reexamination, the PHA must use the current utility allowance schedule [HCV GB, p._18-8].

PHA Policy

Revised utility allowances will be applied to a family’s rent and subsidy calculations at the first annual reexamination that is effective after the allowance is adopted.

6-III.E. PRORATED ASSISTANCE FOR MIXED FAMILIES [24 CFR 5.520]

HUD regulations prohibit assistance to ineligible family members. A *mixed family* is one that includes at least one U.S. citizen or eligible immigrant and any number of ineligible family members. The PHA must prorate the assistance provided to a mixed family. The PHA will first determine assistance as if all family members were eligible and then prorate the assistance based upon the percentage of family members that actually are eligible. For example, if the PHA subsidy for a family is calculated at \$500 and two of four family members are ineligible, the PHA subsidy would be reduced to \$250.

EXHIBIT 6-1: ANNUAL INCOME INCLUSIONS	
24 CFR 5.609 <i>(a) Annual income means all amounts, monetary or not, which:</i> (1) Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or (2) Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and (3) Which are not specifically excluded in paragraph (c) of this section. (4) Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access. <i>(b) Annual income includes, but is not limited to:</i> (1) The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services; (2) The net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family;	(3) Interest, dividends, and other net income of any kind from real or personal property. Expenditures for amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation is permitted only as authorized in paragraph (b)(2) of this section. Any withdrawal of cash or assets from an investment will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested by the family. Where the family has net family assets in excess of \$5,000, annual income shall include the greater of the actual income derived from all net family assets or a percentage of the value of such assets based on the current passbook savings rate, as determined by HUD (4) The full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts, including a lump-sum amount or prospective monthly amounts for the delayed start of a periodic amount (except as provided in paragraph (c)(14) of this section); (5) Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay (except as provided in paragraph (c)(3) of this section); (6) Welfare assistance payments. (i) Welfare assistance payments made under the Temporary Assistance for Needy Families (TANF) program are included in annual income only to the extent such payments:

(A) Qualify as assistance under the TANF program definition at 45 CFR 260.31¹; and

(B) Are not otherwise excluded under paragraph (c) of this section.

(ii) If the welfare assistance payment includes an amount specifically designated for shelter and utilities that is subject to adjustment by the welfare assistance agency in accordance with the actual cost of shelter and utilities, the amount of welfare assistance income to be included as income shall consist of:

(A) The amount of the allowance or grant exclusive of the amount specifically designated for shelter or utilities; plus

(B) The maximum amount that the welfare assistance agency could in fact allow the family for shelter and utilities. If the family's welfare assistance is ratably reduced from the standard of need by applying a percentage, the amount calculated under this paragraph shall be the amount resulting from one application of the percentage.

(7) Periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing in the dwelling.

(8) All regular pay, special pay and allowances of a member of the Armed Forces (except as provided in paragraph (c)(7) of this section)

(9) For section 8 programs only and as provided in 24 CFR 5.612, any financial assistance, in excess of amounts received for tuition, that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or from an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except that financial assistance described in this paragraph is not considered annual income for persons over the age of 23 with dependent children. For purposes of this paragraph, "financial assistance" does not include loan proceeds for the purpose of determining income.

HHS DEFINITION OF "ASSISTANCE"

45 CFR: GENERAL TEMPORARY ASSISTANCE FOR NEEDY FAMILIES

260.31 What does the term "assistance" mean?

(a)(1) The term "assistance" includes cash, payments, vouchers, and other forms of benefits designed to meet a family's ongoing basic needs (i.e., for food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses).

(2) It includes such benefits even when they are:

(i) Provided in the form of payments by a TANF agency, or other agency on its behalf, to individual recipients; and

(ii) Conditioned on participation in work experience or community service (or any other work activity under 261.30 of this chapter).

¹ Text of 45 CFR 260.31 follows.

(3) Except where excluded under paragraph (b) of this section, it also includes supportive services such as transportation and childcare provided to families who are not employed.

(b) [The definition of “assistance”] excludes: (1) Nonrecurrent, short-term benefits that:

(i) Are designed to deal with a specific crisis situation or episode of need;

(ii) Are not intended to meet recurrent or ongoing needs; and

(iii) Will not extend beyond four months.

(2) Work subsidies (i.e., payments to employers or third parties to help cover the costs of employee wages, benefits, supervision, and training);

(3) Supportive services such as childcare and transportation provided to families who are employed;

(4) Refundable earned income tax credits;

(5) Contributions to, and distributions from, Individual Development Accounts;

(6) Services such as counseling, case management, peer support, childcare information and referral, transitional services, job retention, job advancement, and other employment-related services that do not provide basic income support; and

(7) Transportation benefits provided under a Job Access or Reverse Commute project, pursuant to section 404(k) of [the Social Security] Act, to an individual who is not otherwise receiving assistance.

EXHIBIT 6-2: ANNUAL INCOME EXCLUSIONS

24 CFR 5.609

(c) Annual income does not include the following:

- (1) Income from employment of children (including foster children) under the age of 18 years;
- (2) Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone);
- (3) Lump-sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses (except as provided in paragraph (b)(5) of this section);
- (4) Amounts received by the family that are specifically for, or in reimbursement of, the cost of medical expenses for any family member;
- (5) Income of a live-in aide, as defined in Sec. 5.403;
- (6) Subject to paragraph (b)(9) of this section, the full amount of student financial assistance paid directly to the student or to the educational institution;
- (7) The special pay to a family member serving in the Armed Forces who is exposed to hostile fire;
- (8) (i) Amounts received under training programs funded by HUD;
(ii) Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);
- (iii) Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program;
- (iv) Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time;
- (v) Incremental earnings and benefits resulting to any family member from participation in qualifying State or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment training program;
- (9) Temporary, nonrecurring or sporadic income (including gifts);
- (10) Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era;
- (11) Earnings in excess of \$480 for each full-time student 18 years old or older (excluding the head of household and spouse);

(12) Adoption assistance payments in excess of \$480 per adopted child;

(13) [Reserved]

(14) Deferred periodic amounts from supplemental security income 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 benefits that are received in a lump sum amount or prospective monthly amounts.

(15) Amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit;

(16) Amounts paid by a State agency to a family with a member who has a

developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home; or

(17) Amounts specifically excluded by any other Federal statute from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in 24 CFR 5.609(c) apply. A notice will be published in the Federal Register and distributed to PHAs and housing owners identifying the benefits that qualify for this exclusion. Updates will be published and distributed when necessary. [See Section 6-I.M. for a list of benefits that qualify for this exclusion.]

EXHIBIT 6-3: TREATMENT OF FAMILY ASSETS

24 CFR 5.603(b) Net Family Assets

(1) Net cash value after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment, excluding interests in Indian trust land and excluding equity accounts in HUD homeownership programs. The value of necessary items of personal property such as furniture and automobiles shall be excluded.

(2) In cases where a trust fund has been established and the trust is not revocable by, or under the control of, any member of the family or household, the value of the trust fund will not be considered an asset so long as the fund continues to be held in trust. Any income distributed from the trust fund shall be counted when determining annual income under Sec. 5.609.

(3) In determining net family assets, PHAs or owners, as applicable, shall 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 important consideration not measurable in dollar terms.

(4) For purposes of determining annual income under Sec. 5.609, the term "net family assets" does not include the value of a home currently being purchased with assistance under part 982, subpart M of this title. This exclusion is limited to the first 10 years after the purchase date of the home.

EXHIBIT 6-4: THE EFFECT OF WELFARE BENEFIT REDUCTION

24 CFR 5.615

Public housing program and Section 8 tenant-based assistance program: How welfare benefit reduction affects family income

(a) Applicability. This section applies to covered families who reside in public housing (part 960 of this title) or receive Section 8 tenant-based assistance (part 982 of this title)

(b) Definitions. The following definitions apply for purposes of this section:

Covered families. Families who receive welfare assistance or other public assistance benefits ("welfare benefits") from a State or other public agency ("welfare agency") under a program for which Federal, State, or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for such assistance.

Economic self-sufficiency program. See definition at Sec. 5.603.

Imputed welfare income. The amount of annual income not actually received by a family, as a result of a specified welfare benefit reduction, that is nonetheless included in the family's annual income for purposes of determining rent.

Specified welfare benefit reduction.

(1) A reduction of welfare benefits by the welfare agency, in whole or in part, for a family member, as determined by the welfare agency, because of fraud by a family member in connection with the welfare program; or because of welfare agency sanction against a family member for noncompliance with a welfare agency requirement to participate in an economic self-sufficiency program.

(2) "Specified welfare benefit reduction" does not include a reduction or termination of welfare benefits by the welfare agency:

(i) at expiration of a lifetime or other time limit on the payment of welfare benefits;

(ii) because a family member is not able to obtain employment, even though the family

member has complied with welfare agency economic self-sufficiency or work activities requirements; or

(iii) because a family member has not complied with other welfare agency requirements.

(c) Imputed welfare income.

(1) A family's annual income includes the amount of imputed welfare income (because of a specified welfare benefits reduction, as specified in notice to the PHA by the welfare agency), plus the total amount of other annual income as determined in accordance with Sec. 5.609.

(2) At the request of the PHA, the welfare agency will inform the PHA in writing of the amount and term of any specified welfare benefit reduction for a family member, and the reason for such reduction, and will also inform the PHA of any subsequent changes in the term or amount of such specified welfare benefit reduction. The PHA will use this information to determine the amount of imputed welfare income for a family.

(3) A family's annual income includes imputed welfare income in family annual income, as determined at the PHA's interim or regular reexamination of family income and composition, during the term of the welfare benefits reduction (as specified in information provided to the PHA by the welfare agency).

(4) The amount of the imputed welfare income is offset by the amount of additional income a family receives that commences after the time the sanction was imposed. When such additional income from other sources is at least equal to the imputed

(5) The PHA may not include imputed welfare income in annual income if the family was not an assisted resident at the time of sanction.

(d) Review of PHA decision.

(1) Public housing. If a public housing tenant claims that the PHA has not correctly calculated the amount of imputed welfare income in accordance with HUD requirements, and if the PHA denies the family's request to modify such amount, the PHA shall give the tenant written notice of such denial, with a brief explanation of the basis for the PHA determination of the amount of imputed welfare income. The PHA notice shall also state that if the tenant does not agree with the PHA determination, the tenant may request a grievance hearing in accordance with part 966, subpart B of this title to review the PHA determination. The tenant is not required to pay an escrow deposit pursuant to Sec. 966.55(e) for the portion of tenant rent attributable to the imputed welfare income in order to obtain a grievance hearing on the PHA determination.

(2) Section 8 participant. A participant in the Section 8 tenant-based assistance program may request an informal hearing, in accordance with Sec. 982.555 of this title, to review the PHA determination of the amount of imputed welfare income that must be included in the family's annual income in accordance with this section. If the family claims that such amount is not correctly calculated in accordance with HUD requirements, and if the PHA denies the family's request to modify such amount, the PHA shall give the family written notice of such denial, with a brief explanation of the basis for the PHA determination of the amount of imputed welfare income. Such notice shall also state that if the family does not agree with the PHA determination, the family may request an informal hearing on the determination under the PHA hearing procedure.

(e) PHA relation with welfare agency.

(1) The PHA must ask welfare agencies to inform the PHA of any specified welfare benefits reduction for a family member, the reason for such reduction, the term of any such reduction, and any subsequent welfare agency determination affecting the amount or term of a specified welfare benefits reduction. If the welfare agency determines a specified welfare benefits reduction for a family member, and gives the PHA written notice of such reduction, the family's annual incomes shall include the imputed welfare income because of the specified welfare benefits reduction.

(2) The PHA is responsible for determining the amount of imputed welfare income that is included in the family's annual income as a result of a specified welfare benefits reduction as determined by the welfare agency and specified in the notice by the welfare agency to the PHA. However, the PHA is not responsible for determining whether a reduction of welfare benefits by the welfare agency was correctly determined by the welfare agency in accordance with welfare program requirements and procedures, nor for providing the opportunity for review or hearing on such welfare agency determinations.

(3) Such welfare agency determinations are the responsibility of the welfare agency, and the family may seek appeal of such determinations through the welfare agency's normal due process procedures. The PHA shall be entitled to rely on the welfare agency notice to the PHA of the welfare agency's determination of a specified welfare benefits reduction.

Chapter 6. B.

INCOME AND SUBSIDY DETERMINATIONS UNDER HOTMA 102/104

[24 CFR Part 5, Subparts E and F; 24 CFR 982]

INTRODUCTION

This chapter is applicable upon the PHA's HOTMA 102/104 compliance date. Prior to this date, the PHA will follow policies as outlined in Chapter 6. A₂ of the model policy.

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

A family's income determines eligibility for assistance and is also used to calculate the family's payment and the PHA's subsidy. The PHA will use the policies and methods described in this chapter to ensure that only eligible families receive assistance and that no family pays more or less than its obligation under the regulations. This chapter describes HUD regulations and PHA policies related to these topics in three parts as follows:

- Part I: Annual Income. HUD regulations specify the sources of income which are excluded from the ~~to include and exclude to arrive at a~~ family's annual income. These requirements and PHA policies for calculating annual income are found in Part I.
- Part II: -Assets.- HUD regulations specify the types of assets which are excluded from a family's annual income. -These requirements and PHA policies for calculating income from assets are found in Part II.
- Part III: Adjusted Income. Once annual income has been established, HUD regulations require the PHA to subtract from annual income any of five mandatory deductions for which a family qualifies ~~and allow the PHA to adopt additional permissive deductions.-~~ These requirements and PHA policies for calculating adjusted income are found in Part -III.
- Part IV: Calculating Family Share and PHA Subsidy. This part describes the statutory formula for calculating total tenant payment (TTP), the use of utility allowances, and the methodology for determining PHA subsidy and required family payment.

PART I: ANNUAL INCOME

6-I.A. OVERVIEW [24 CFR 5.609]

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 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.- The full texts of those portions of the regulations are provided in exhibits at the end of this chapter as follows:

- * Annual Income Full Definition (Exhibit 6-1)
- * Treatment of Family Assets (Exhibit 6-2)
- * The Effect of Welfare Benefit Reduction (Exhibit 6-3)

Sections 6-I. B and 6-I.C discuss general requirements and methods for calculating annual income. -The rest of this section describes how each source of income is treated for the purposes of determining annual income. Verification requirements for annual income are discussed in Chapter 7.

~~The general regulatory definition of annual income shown below is from 24 CFR 5.609.~~

~~5.609 Annual income.~~

~~(a) Annual income means all amounts, monetary or not, which:~~

~~(1) Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or~~

~~(2) Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and~~

~~(3) Which are not specifically excluded in paragraph [5.609(c)].~~

~~(4) Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.~~

In addition to this general definition, HUD regulations establish policies for treating specific types of income and assets. The full texts of those portions of the regulations are provided in exhibits at the end of this chapter as follows:

- ~~Annual Income Inclusions (Exhibit 6-1)~~
- ~~Annual Income Exclusions (Exhibit 6-1)~~
- ~~Treatment of Family Assets (Exhibit 6-2)~~
- ~~Earned Income Disallowance for Persons with Disabilities (Exhibit 6-4)~~
- ~~The Effect of Welfare Benefit Reduction (Exhibit 6-3)~~

Sections 6-I. B and 6-I.C discuss general requirements and methods for calculating annual income. The rest of this section describes how each source of income is treated for the purposes of determining annual income.

HUD regulations present income inclusions and exclusions separately [24 CFR 5.609(b) and 24 CFR 5.609(c)]. In this plan, however, the discussions of income inclusions and exclusions are integrated by topic (e.g., all policies affecting earned income are discussed together in section 6-I. D).

6-I.B. HOUSEHOLD COMPOSITION AND INCOME

Overview

Income received by all family members must be counted unless specifically excluded by the regulations. It is the responsibility of the head of household to report changes in family composition **in accordance with HUD regulations and PHA policies in Chapter 11**. The rules on which sources of income are counted vary somewhat by family member. The chart below summarizes how family composition affects income determinations.

Summary of Income Included and Excluded by Person	
Live-in aides	Income from all sources (both earned and unearned) is excluded ~~[24 CFR 5.609(b)(8)]~~ .
Foster child or foster adult	Income from all sources (both earned and unearned) is excluded [24 CFR 5.609(b)(8)].
Head, spouse, or cohead ~~Other adult family members~~	All sources of income not specifically excluded by the regulations are included ~~[24 CFR 5.609(a)]~~ .
Minors ~~Children under 18 years of age~~	Earned income of children under 18 years of age is excluded [24 CFR 5.609(b)(3)]. ~~Employment income is excluded [24 CFR 5.609(c)(1)]~~ . All other sources of unearned income, except those specifically excluded by the regulations, are included [24 CFR 5.609(a)].
Full-time students 18 years of age or older (not head, spouse, or cohead)	Earned income in excess of the dependent deduction is excluded [24 CFR 5.609(b)(14)]. ~~Employment income above \$480/year is excluded [24 CFR 5.609(c)(11)]~~ . All other sources of unearned income, except those specifically excluded by the regulations, are included.

Temporarily Absent Family Members

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.

~~The income of family members approved to live in the unit will be counted, even if the family member is temporarily absent from the unit [HCV GB, p. 5-18].~~

PHA Policy

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 is considered temporarily absent and continues to be considered a family member.

Generally, an individual who is or is expected to be absent from the assisted unit for more than 180 consecutive days is considered permanently absent and no longer a family member. Exceptions to this general policy are discussed below.

Absent Students

PHA Policy

When someone who has been considered a family member attends school away from home, the person will continue to be considered a family member unless information becomes available to the PHA indicating that the student has established a separate household, or the family declares that the student has established a separate household.

Absences Due to Placement in Foster Care

Children temporarily absent from the home as a result of placement in foster care (as confirmed by the state child welfare agency) are considered members of the family [24 CFR 5.403].

PHA Policy

If a child has been placed in foster care, the PHA will verify with the appropriate agency whether and when the child is expected to be returned to the home. Unless the agency confirms that the child has been permanently removed from the home, the child will **continue to** be counted as a family member.

Absent Head, Spouse, or Cohead

PHA Policy

An employed head, spouse, or cohead absent from the unit more than 180 consecutive days due to employment will continue to be considered a family member.

Family Members Permanently Confined for Medical Reasons

If a family member is confined to a nursing home or hospital on a permanent basis, that person is no longer considered a family member and the income of that person is not counted [HCV GB, p. 5-22].

PHA Policy

The PHA will request verification from a responsible medical professional and will use this determination. If the responsible medical professional cannot provide a determination, the person generally will be considered temporarily absent. The family may present evidence that the family member is confined on a permanent basis and request that the person not be considered a family member.

When an individual who has been counted as a family member is determined permanently absent, the family is eligible for the medical expense deduction only if the remaining head, spouse, or cohead qualifies as an elderly person or a person with disabilities.

Joint Custody of Dependents

PHA Policy

Dependents that are subject to a joint custody arrangement will be considered a member of the family, if they live with the applicant or participant family 50 percent or more of the time.

When more than one applicant or participant family is claiming the same dependents as family members, the family with primary custody at the time of the initial examination or reexamination will be able to claim the dependents. If there is a dispute about which family should claim them, the PHA will make the determination based on available documents such as court orders, school records, or an IRS return showing which family has claimed the child for income tax purposes.

Caretakers for a Child

PHA Policy

The approval of a caretaker is at the owner and PHA's discretion and subject to the owner and PHA's screening criteria. If neither a parent nor a designated guardian remains in a household receiving HCV assistance, the PHA will take the following actions.

- (1) If a responsible agency has determined that another adult is to be brought into the assisted unit to care for a child for an indefinite period, the designated caretaker will not be considered a family member until a determination of custody or legal guardianship is made.
- (2) If a caretaker has assumed responsibility for a child without the involvement of a responsible agency or formal assignment of custody or legal guardianship, the caretaker will be treated as a visitor for 90 days. After the 90 days has elapsed, the caretaker will be considered a family member unless information is provided that would confirm that the caretaker's role is temporary. In such cases the PHA will extend the caretaker's status as an eligible visitor.
- (3) At any time that custody or guardianship legally has been awarded to a caretaker, the housing choice voucher will be transferred to the caretaker.
- (4) During any period that a caretaker is considered a visitor, the income of the caretaker is not counted in annual income and the caretaker does not qualify the family for any deductions from income.

6-I.C. CALCULATING ANNUAL INCOME

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.

Anticipating Annual Income [24 CFR 5.609(c)(1)]

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.

~~The PHA is required to count all income “anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date” [24 CFR 5.609(a)(2)]. Policies related to anticipating annual income are provided below.~~

~~The PHA generally will use current circumstances to determine anticipated income for the coming 12-month period. HUD authorizes the PHA to use other than current circumstances to anticipate income when:~~

- ~~• An imminent change in circumstances is expected [HCV GB, p. 5-17]~~
- ~~• It is not feasible to anticipate a level of income over a 12-month period (e.g., seasonal or cyclic income) [24 CFR 5.609(d)]~~
- ~~• The PHA believes that past income is the best available indicator of expected future income [24 CFR 5.609(d)]~~

~~PHAs are required to use HUD’s Enterprise Income Verification (EIV) system in its entirety as a third-party source to verify employment and income information, and to reduce administrative subsidy payment errors in accordance with HUD administrative guidance [24 CFR 5.233(a)(2)].~~

~~HUD allows PHAs to use tenant provided documents (pay stubs) to project income once EIV data has been received in such cases where the family does not dispute the EIV employer data and where the PHA does not determine it is necessary to obtain additional third-party data.~~

PHA Policy

~~When EIV is obtained and the family does not dispute the EIV employer data, the PHA will use current tenant provided documents to project annual income. When the tenant provided documents are pay stubs, the PHA will make every effort to obtain current and consecutive pay stubs dated within the last 60 days.~~

~~The PHA will obtain written and/or oral third-party verification in accordance with the verification requirements and policy in Chapter 7 in the following cases:~~

~~If EIV or other UIV data is not available,~~

~~If the family disputes the accuracy of the EIV employer data, and/or~~

~~If the PHA determines additional information is needed.~~

~~In such cases, the PHA will review and analyze current data to anticipate annual 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.~~

PHA Policy

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: $(\$8/\text{hour} \times 40 \text{ hours} \times 7 \text{ weeks}) + (\$8.25 \times 40 \text{ hours} \times 45 \text{ weeks})$.



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. when the change occurs. This requirement will be imposed even if the PHA's policy on reexaminations does not require interim reexaminations for other types of changes. When tenant-provided third-party documents are used to anticipate annual income, they will be dated within the last 60 days of the reexamination interview date.~~

Projecting Income

~~In HUD's EIV webcast of January 2008, HUD made clear that PHAs are not to use EIV quarterly wages to project annual income.~~

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 in Chapter 11, ~~except where the PHA uses a streamlined income determination under 24 CFR 5.657(d) or 960.257.~~

6-I.D. EARNED INCOME

~~Types of Earned Income Included in Annual Income~~

Wages and Related Compensation [24 CFR 5.609(a); Notice PIH 2023-27]

The earned income of each member of the family who is 18 years of age or older, or who is the head of household or spouse/cohead regardless of age, is included in annual income.

Income received as a day laborer or seasonal worker is also included in annual income, even if the source, date, or amount of the income varies [24 CFR 5.609 (b)(24)].

Earned income means as income or earnings from wages, tips, salaries, other employee compensation, and net income from self-employment. -Earned income does not include any pension or annuity, transfer payments (meaning payments made or income received in which no goods or services are being paid for, such as welfare, social security, and governmental subsidies for certain benefits), or any cash or in-kind benefits- [24 CFR 5.100].

~~While some forms, like regular wages and salaries, may be easy to anticipate, other forms, like bonuses and commissions, may vary considerably from one pay period to the next.~~

~~A day laborer is defined as an individual hired and paid one day at a time without an agreement that the individual will be hired or work again in the future [24 CFR 5.603(b)]. -Income earned as a day laborer is not considered nonrecurring income.~~

~~A seasonal worker is defined as an individual who is hired into a short-term position (e.g., for which the customary employment period for the position is six months or fewer) and the employment begins about the same time each year (such as summer or winter). -Typically, the individual is hired to address seasonal demands that arise for the employer or industry [(24 CFR 5.603(b)).]- Some examples of seasonal work include employment limited to holidays or agricultural seasons. Seasonal work may include but is not limited to employment as a lifeguard, ballpark vendor, or snowplow driver [Notice PIH 2023-27]. -Income earned as a seasonal worker is not considered nonrecurring income.~~

PHA Policy

The PHA will include in annual income the full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation. ~~for personal services is included in annual income [24 CFR 5.609(b)(1)].~~

For persons who regularly receive bonuses or commissions, the PHA will verify, and then average amounts received for the two years preceding admission or interim reexamination. If only a one-year history is available, the PHA will use the prior year amounts. In either case the family may provide, and the PHA will consider, a credible justification for not using this history to anticipate future bonuses or commissions. If a new employee has not yet received any bonuses or commissions, the PHA will count only the amount estimated by the employer. The file will be documented appropriately.

Military Pay

All regular pay, special pay and allowances of a member of the Armed Forces are counted except for the special pay to a family member serving in the Armed Forces who is exposed to hostile fire [24 CFR 5.609(b)(11)].

~~Types of Earned Income Not Counted in Annual Income~~

~~Temporary, Nonrecurring, or Sporadic Income [24 CFR 5.609(e)(9)]~~

~~This type of income (including gifts) is not included in annual income. Sporadic income includes temporary payments from the U.S. Census Bureau for employment lasting no longer than 180 days~~

~~PHA Policy~~

~~Sporadic income is income that is not received periodically and cannot be reliably predicted. For example, the income of an individual who works occasionally as a handyman would be considered sporadic if future work could not be anticipated and no historic, stable pattern of income existed.~~

~~Earnings of a Minor Children's Earnings [24 CFR 5.609(b)(3)]~~

~~A minor is a member of the family, other than the head of household or spouse, who is **Employment income earned by children (including foster children)** under 18 years of age. Employment income earned by minors is not included in annual income. All other sources of unearned income, except those specifically excluded by the regulations, are included. (See **Eligibility chapter for a definition of foster children.**)~~

~~Certain Earned Income of Full-Time Students [24 CFR 5.609(b)(14)]~~

~~The earned income of a dependent full-time student in excess of the amount of the dependent deduction is excluded from annual income. All sources of unearned income, except those specifically excluded by the regulations, are included.~~

~~A family member other than the head of household or spouse/cohead is considered a **Earnings in excess of \$480 for each** full-time student if they **18 years old or older (except for the head, spouse, or cohead)** are attending school or vocational training on a full-time basis [24 CFR 5.603(b)]. To be considered "full-time," a student must be considered "full-time" by an educational institution with a degree or certificate program [HCV GB, p. 5-29].~~

Income of a Live-in Aide

Income earned by a live-in aide, as defined in [24 CFR 5.403], is not included in annual income [24 CFR 5.609(e)(5)]. (See Eligibility chapter for a full discussion of live-in aides.)

Income Earned under Certain Federal Programs

Income from some federal programs is specifically excluded from consideration as income [24 CFR 5.609(e)(17)], including:

- ~~Payments to volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058)~~
- ~~Awards under the federal work-study program (20 U.S.C. 1087 uu)~~
- ~~Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056(f))~~
- ~~Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d))~~
- ~~Allowances, earnings, and payments to participants in programs funded under the Workforce Investment Act of 1998 (29 U.S.C. 2931)~~

Resident Service Stipend

~~Amounts received under a resident service stipend are not included in annual income. A resident service stipend is a modest amount (not to exceed \$200 per individual per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period [24 CFR 5.600(e)(8)(iv)].~~

State and Local Employment Training Programs

~~Incremental earnings and benefits to any family member resulting from participation in qualifying state or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff are excluded from annual income. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the training program [24 CFR 5.609(e)(8)(v)].~~

PHA Policy

~~The PHA defines *training program* as “a learning process with goals and objectives, generally having a variety of components, and taking place in a series of sessions over a period of time. It is designed to lead to a higher level of proficiency, and it enhances the individual’s ability to obtain employment. It may have performance standards to measure proficiency. Training may include but is not limited to: (1) classroom training in a specific occupational skill, (2) on-the-job training with wages subsidized by the program, or (3) basic education” [expired Notice PIH 98-2, p. 3].~~

~~The PHA defines *incremental earnings and benefits* as the difference between: (1) the total amount of welfare assistance and earnings of a family member prior to enrollment in a training program, and (2) the total amount of welfare assistance and earnings of the family member after enrollment in the program [expired Notice PIH 98-2, pp. 3–4].~~

~~In calculating the incremental difference, the PHA will use as the pre-enrollment income the total annualized amount of the family member’s welfare assistance and earnings reported on the family’s most recently completed HUD-50058.~~

~~End of participation in a training program must be reported in accordance with the PHA's interim reporting requirements.~~

HUD-Funded Training Programs

Amounts received under training programs funded in whole or in part by HUD [24 CFR 5.609(c)(8)(i)] are excluded from annual income. Eligible sources of funding for the training include operating subsidy, Section 8 administrative fees, and modernization, Community Development Block Grant (CDBG), HOME program, and other grant funds received from HUD.

PHA Policy

To qualify as a training program, the program must meet the definition of *training program* provided above for state and local employment training programs.

Earned Income Tax Credit

Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26U.S.C. 32(j)), are excluded from annual income [24 CFR 5.609(c)(17)]. Although many families receive the EITC annually when they file taxes, an EITC can also be received throughout the year. The prorated share of the annual EITC is included in the employee's payroll check.

Earned Income Disallowance

The earned income disallowance for persons with disabilities is discussed in section 6-I. E below.

6-I.E. EARNED INCOME DISALLOWANCE FOR PERSONS WITH DISABILITIES

[24_CFR 5.617; Streamlining Final Rule (SFR) Federal Register 3/8/16; Notice_PIH_2023--27]

HOTMA removed the statutory authority for the EID.- The EID is available only to families that are eligible for and participating on the program as of December 31, 2023, or before; no new families may be added on or after January 1, 2024. -If a family is receiving the EID prior to or on the effective date of December 31, 2023, they are entitled to the full amount of the benefit for a full 24-month period. -The policies below are applicable only to such families. No family will still be receiving the EID after December 31, 2025. The EID will be sunset on January 1, 2026, and the PHA policies below will no longer be applicable as of that date or when the last qualifying family exhausts their exclusion period, whichever is sooner.

The earned income disallowance (EID) encourages people with disabilities to enter the work force by not including the full value of increases in earned income for a period. The full text of 24 CFR 5.617 is included as Exhibit 6-4 at the end of this chapter. Eligibility criteria and limitations on the disallowance are summarized below.

Eligibility

This disallowance applies only to individuals in families already participating in the HCV program (not at initial examination). To qualify, the family must experience an increase in annual income that is the result of one of the following events:

- Employment of a family member who is a person with disabilities and who was previously unemployed for one or more years prior to employment. *Previously unemployed* includes a person who annually has earned not more than the minimum wage applicable to the community multiplied by 500 hours. The applicable minimum wage is the federal minimum wage unless there is a higher state or local minimum wage.
- Increased earnings by a family member who is a person with disabilities and whose earnings increase during participation in an economic self-sufficiency or job training program. A self-sufficiency program includes a program designed to encourage, assist, train, or facilitate the economic independence of HUD-assisted families or to provide work to such families [24 CFR 5.603(b)].
- New employment or increased earnings by a family member who is a person with disabilities and who has received benefits or services under Temporary Assistance for Needy Families (TANF), or any other state program funded under Part A of Title IV of the Social Security Act within the past six months. If the benefits are received in the form of monthly maintenance, there is no minimum amount. If the benefits or services are received in a form other than monthly maintenance, such as one-time payments, wage subsidies, or transportation assistance, the total amount received over the six-month period must be at least \$500.

Calculation of the Disallowance

Calculation of the earned income disallowance for an eligible member of a qualified family begins with a comparison of the member's current income with their "baseline income." The family member's baseline income is their income immediately prior to qualifying for the EID. The family member's baseline income remains constant throughout the period that they are participating in the EID.

Calculation Method

Initial 12-Month Exclusion

During the initial exclusion period of 12 consecutive months, the full amount (100 percent) of any increase in income attributable to new employment or increased earnings is excluded.

PHA Policy

The initial EID exclusion period will begin on the first of the month following the date an eligible member of a qualified family is first employed or first experiences an increase in earnings.

Second 12-Month Exclusion

During the second exclusion period of 12 consecutive months, the PHA must exclude at least 50 percent of any increase in income attributable to employment or increased earnings.

PHA Policy

During the second 12-month exclusion period, the PHA will exclude 100 percent of any increase in income attributable to new employment or increased earnings.

Lifetime Limitation

The EID has a two-year (24-month) lifetime maximum. The two-year eligibility period begins at the same time that the initial exclusion period begins and ends 24 months later. During the 24-month period, an individual remains eligible for EID even if they begin to receive assistance from a different housing agency, move between public housing and Section 8 assistance, or have breaks in assistance. **-The EID will be sunset on January 1, 2026. -In no circumstances will a family member's exclusion period continue past January 1, 2026.**

6-I.F. BUSINESS INCOME AND SELF-EMPLOYMENT INCOME [24 CFR 5.609(b)(28); Notice-PIH 2023-27]

~~24 CFR 5.609(b)(28) indicates that net income from a business or profession must be included in annual income. The complete text of the regulation is provided in the model plan. PHA policies are required in the following areas:~~

- ~~• Definitions for calculating business income.~~
- ~~• Treatment of negative net income~~
- ~~• Withdrawals from a business~~
- ~~• Co-owned businesses~~

~~HUD uses several financial terms in the regulation but does not define them. The model plan clarifies the meaning of these terms.~~

Annual income includes “net income from the operation of a business or profession. *Net income* is gross income minus business expenses that allows the business to operate. *Gross income* is all income amounts received into the business, prior to the deduction of business expenses.

Expenditures for business expansion or amortization of capital indebtedness may not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations. Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family.”” ~~[24 CFR 5.609(b)(2)].~~

Business Expenses

~~Net income is “gross income less business expense” [HCV GB, p. 5-19].~~

PHA Policy

To determine business expenses that may be deducted from gross income, the PHA will use current applicable Internal Revenue Service (IRS) rules for determining allowable business expenses [see IRS Publication 535], unless a topic is addressed by HUD regulations or guidance as described herein.

Independent Contractors

~~Income received as an independent contractor is included in annual income, even if the source, date, or amount of the income varies [24 CFR 5.609(b)(24)].~~

~~An *independent contractor* is defined as an individual who qualifies as an independent contractor instead of an employee in accordance with the Internal Revenue Code Federal income tax requirements and whose earnings are consequently subject to the Self-Employment Tax. -In general, an individual is an independent contractor if the payer has the right to control or direct only the result of the work and not what will be done and how it will be done [24 CFR 5.603(b)]. This may include individuals such as third-party delivery and transportation service providers and “gig workers” like babysitters, landscapers, rideshare drivers, and house cleaners. -Income earned as an independent contractor is not considered nonrecurring income.~~

Business Expansion

HUD regulations do not permit the PHA to deduct from gross income expenses for business expansion.

PHA Policy

Business expansion is defined as any capital expenditures made to add new business activities, to expand current facilities, or to operate the business in additional locations. For example, purchase of a street sweeper by a construction business for the purpose of adding street cleaning to the services offered by the business would be considered a business expansion. Similarly, the purchase of a property by a hair care business to open at a second location would be considered a business expansion.

Capital Indebtedness

HUD regulations do not permit the PHA to deduct from gross income the amortization of capital indebtedness.

PHA Policy

Capital indebtedness is defined as the principal portion of the payment on a capital asset such as land, buildings, and machinery. This means the PHA will allow as a business expense interest, but not principal, paid on capital indebtedness.

Negative Business Income

If the net income from a business is negative, no business income will be included in annual income; a negative amount will not be used to offset other family income.

Withdrawal of Cash or Assets from a Business

HUD regulations require the PHA to include in annual income the withdrawal of cash or assets from the operation of a business or profession unless the withdrawal reimburses a family member for cash or assets invested in the business by the family.

PHA Policy

Acceptable investments in a business include cash loans and contributions of assets or equipment. For example, if a member of an assisted family provided an up-front loan of \$2,000 to help a business get started, the PHA will not count as income any withdrawals from the business up to the amount of this loan until the loan has been repaid.

Investments do not include the value of labor contributed to the business without compensation.

Co-owned Businesses

PHA Policy

If a business is co-owned with someone outside the family, the family must document the share of the business it owns. If the family's share of the income is lower than its share of ownership, the family must document the reasons for the difference.

Assets Owned by a Business Entity

If a business entity (e.g., limited liability company or limited partnership) owns the asset, then the family's asset is their ownership stake in the business, not some portion of the business's assets. However, if the family holds the assets in their own name (e.g., they own one-third of a restaurant) rather than in the name of a business entity, then the percentage value of the asset owned by the family is what is counted toward net family assets (e.g., one-third of the value of the restaurant) [Notice PIH 2023-27].

6-I.G. STUDENT FINANCIAL ASSISTANCE [FR Notice 2/14/23 and Notice PIH 2023-27]

Introduction

~~Section 479B of the Higher Education Act (HEA) requires that all assistance under Title IV of the HEA and Bureau of Indian Affairs student financial assistance, even assistance provided to students in excess of tuition and required fees or charges, be excluded from HUD income calculations.~~

~~For Section 8 programs only, however, for over 10 years through FY 2022, HUD appropriations have included a provision that for certain students receiving Section 8 assistance, any amounts received in excess of tuition and any other required fees and charges are considered income (with the exception of students who lived with their parents or who were over the age of 23 with a dependent child).~~

~~While the language in various consolidated appropriations acts is limited to federal fiscal year covered by the act, this does not rule out the possibility that similar language will be included in future years' appropriations bills.~~

- ~~• For any funds from a year where HUD's appropriations acts include this limitation, it will apply with respect to Section 8 participants. The PHA will follow the pre-HOTMA Section 8 student financial assistance limitation described below.~~
- ~~• During years in which an appropriations act does not contain this Section 8 student financial assistance limitation (or any other such limitation), then the determination of student financial assistance as included/excluded income for all Section 8 students' defaults to the methodology described for the public housing program and listed below.~~

Pre-HOTMA Section 8 Student Financial Assistance Limitation [FR 4/10/06; Notice PIH 2015-21]

~~In 2005, Congress passed a law (for Section 8 programs only) requiring that certain student financial assistance be included in annual income. Prior to that, the full amount of student financial assistance was excluded. For some students, the full exclusion still applies.~~

~~The regulation requiring the inclusion of certain student financial assistance applies only to students who satisfy all the following conditions:~~

- ~~• They are enrolled in an institution of higher education, as defined under the Higher Education Act (HEA) of 1965.~~
- ~~• They are seeking or receiving Section 8 assistance on their own—that is, apart from their parents—through the HCV program, the project-based voucher program, or the moderate rehabilitation program.~~
- ~~• They are under 24 years of age **OR** they have no dependent children.~~

~~For students who satisfy these three conditions, any financial assistance in excess of tuition and any other required fees and charges received: (1) under the 1965 HEA, (2) from a private source, or (3) from an institution of higher education, as defined under the 1965 HEA, must be included in annual income.~~

To determine annual income in accordance with the above requirements, the PHA will use the definitions of *dependent child*, *institution of higher education*, and *parents* in Chapter 3, along with the following definitions [FR 4/10/06, pp. 18148-18150]:

- ~~Assistance under the Higher Education Act of 1965 includes Pell Grants, Federal Supplement Educational Opportunity Grants, Academic Achievement Incentive Scholarships, State Assistance under the Leveraging Educational Assistance Partnership Program, the Robert G. Byrd Honors Scholarship Program, and Federal Work Study programs.~~
- ~~Assistance from private sources means assistance from nongovernmental sources, including parents, guardians, and other persons not residing with the student in an HCV-assisted unit.~~
- ~~Tuition and fees are defined in the same manner in which the Department of Education defines *tuition and fees* [Notice PIH 2015-21].~~

~~This is the amount of tuition and required fees covering a full academic year most frequently charged to students.~~

~~The amount represents what a typical student would be charged and may not be the same for all students at an institution.~~

~~If tuition is charged on a per-credit-hour basis, the average full-time credit hour load for an academic year is used to estimate average tuition.~~

~~Required fees include all fixed-sum charges that are required of a large proportion of all students. Examples include, but are not limited to, writing and science lab fees and fees specific to the student's major or program (i.e., nursing program).~~

~~Expenses related to attending an institution of higher education must **not** be included as tuition. Examples include, but are not limited to, room and board, books, supplies, meal plans, transportation and parking, student health insurance plans, and other non-fixed-sum charges.~~

~~Any student financial assistance not subject to inclusion under the regulations is fully excluded from annual income, whether it is paid directly to the student or to the educational institution the student is attending. This includes any financial assistance received by:~~

- ~~Students residing with parents who are seeking or receiving Section 8 assistance.~~
- ~~Students who are enrolled in an educational institution that does **not** meet the 1965 HEA definition of *institution of higher education*.~~
- ~~Students who are over 23 **AND** have at least one dependent child, as defined in section 3-II. E~~
- ~~Students who are receiving financial assistance through a governmental program not authorized under the 1965 HEA.~~

~~HOTMA Student Financial Assistance Requirements [24 CFR 5.609(b)(9)]~~

The treatment of student financial assistance depends on the HUD program, student/household characteristics, and the type of financial assistance received by the student. For public housing residents, all income received under Title IV of the HEA must be excluded from income. Other student financial assistance may be included depending on the students actual covered costs to For Section 8 programs, including HCV, however, for over 10 years HUD appropriations have included a provision that for Section 8 students who are age 23 and under and without dependent children, any amounts received in excess of tuition and any other required fees and charges must be considered income. Under HOTMA, HUD has interpreted this limitation to apply when the student is the head of household or spouse, but not when the student resides with their parents [71 FR 18146].

For any funds from a year where HUD's appropriations continue to include this Section 8 student financial assistance limitation, if the student does not reside with their parents is the head of household, cohead, or spouse, and is under the age of 23 or without dependent children, then both the assistance received under Title IV HEA and other student financial assistance received by the student is included as income to the extent that it exceeds the total of tuition and any other required fees and charges.

In contrast, student financial assistance received by a Section 8 student who is the head of household, spouse, or cohead, and is over the age of 23 with dependent children, or a student who resides with their parents in a Section 8 unit, is governed by the HOTMA student rule, which is described below.

During years in which an appropriations act does not contain this Section 8 student financial assistance limitation (or any other such limitation), then the determination of student financial assistance for all Section 8 students' defaults to the methodology for public housing.

~~HOTMA Student Financial Assistance Requirements [24 CFR 5.609(b)(9)]~~

The regulations under HOTMA distinguish between two categories of student financial assistance paid to both full-time and part-time students.

~~Types of Assistance~~

~~Types of Assistance~~

The first category is any assistance to students under section 479B of the Higher Education Act of 1965 (Title IV of the HEA) which must be excluded from the family's annual income [24 CFR 5.609(b)(9)(i)]. Examples of assistance under title IV of the HEA include:

- Federal Pell Grants;
- Teach Grants;
- Federal Work Study Programs;
- Federal Perkins Loans;
- Income earned in employment and training programs under section 134 of the Workforce Innovation and Opportunity Act (WIOA); or
- Bureau of Indian Affairs/Education student assistance programs

- The Higher Education Tribal Grant
- The Tribally Controlled Colleges or Universities Grant Program

The second category is any other grant-in-aid, scholarship, or other assistance amounts an individual receives for the actual covered costs charged by the institute of higher education (not otherwise excluded by the Federally mandated income exclusions) [24 CFR 5.609(b)(9)(ii)]. Other student financial assistance received by the student that, either by itself or in combination with HEA assistance, exceeds the actual covered costs is included in income.

Actual covered costs are defined as the actual costs of:

- Tuition, books, and supplies.
 - Including supplies and equipment to support students with learning disabilities or other disabilities.
- Room and board; and
- Other fees required and charged to a student by the education institution.

For a student who is not the head of household or spouse/cohead, actual covered costs also include the reasonable and actual costs of housing while attending the institution of higher education and not residing in an assisted unit.

Further, to qualify, other student financial assistance must be expressly:

- For tuition, book, supplies, room and board, or other fees required and charged to the student by the educational institution.
- To assist a student with the costs of higher education; or
- To assist a student who is not the head of household or spouse with the reasonable and actual costs of housing while attending the educational institution and not residing in an assisted unit.

The student financial assistance may be paid directly to the student or to the educational institution on the student's behalf. However, any student financial assistance paid to the student must be verified by the PHA.

The financial assistance must be a grant or scholarship received from:

- The Federal government;
- A state, tribal, or local government ;
- A private foundation registered as a nonprofit;
- A business entity (such as corporation, general partnership, limited liability company, limited partnership, joint venture, business trust, public benefit corporation, or nonprofit entity); or
- An institution of higher education.

Student financial assistance, does not include:

- Financial support provided to the student in the form of a fee for services performed; (e.g., a work study or teaching fellowship that is not excluded under section 479B of the Higher Education Act HEA);
- Gifts, including gifts from family or friends; or

- Any amount of the scholarship or grant that, either by itself or in combination with assistance excluded under the HEA, exceeds the actual covered costs of the student.

Calculating Income from Student Financial Assistance [HOTMA Student Financial Assistance Resource Sheet; Notice PIH 2023-27]

There are two steps required as part of the calculation for Section 8 students. First, determine the student's relationship to the household, age, and whether they have dependent children. Second, calculate whether any excess student financial assistance should be included in the family's income.

If the student does not live with their parents and is the head of household, cohead, or spouse, and is 23 or younger or does not have dependent children, then Title IV HEA assistance is considered when determining the student's total financial aid amount. Subtract the total tuition plus required fees and charges from the total student financial assistance (Title IV HEA assistance and any other student financial assistance). If the total tuition plus required fees and charges is zero or exceeds the amount of total financial assistance from all sources, then no student financial assistance is included in annual income. Any amount of student financial assistance that exceeds the total tuition plus required fees and charges must be included in annual income.

If the student either lives with their parents or is over 23 with dependent children, then the calculation will use the HOTMA methodology for calculating financial assistance, which 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

If the student does not live with their parents and is the head of household, cohead, or spouse, and is 23 or younger or does not have dependent children, then Title IV HEA assistance will be considered when determining the student's total financial assistance to be included in annual income. The PHA will use Notice PIH 2015-21 as a guide to determine the total amount of the student's tuition plus required fees and charges. The PHA will subtract the total tuition plus required fees and charges from the total student financial assistance. If the result is zero or exceeds the amount of total financial assistance from all sources, then no student financial assistance will be included in annual income. Any amount of student financial assistance that exceeds the total tuition plus required fees and charges will be included in annual income.

Example 1

Tuition and required fees and charges: \$20,000

Title IV HEA assistance: \$10,000

Other student financial assistance: \$15,000

Total student financial assistance: $\$10,000 + \$15,000 = \$25,000$

Included income: $\$25,000$ in financial assistance - $\$20,000$ tuition and required fees = $\$5,000$

If a student is head, spouse, or cohead, and is over 23 with dependent children or lives with their parents, the following applies:

If a student only receives financial assistance under Title IV of the HEA and does not receive any other student financial assistance, the PHA will exclude the full amount of the assistance received under Title IV from the family's annual income. The PHA will not calculate actual covered costs in this case.

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.

Example 1

- Actual covered costs: \$20,000
- Other student financial assistance: \$25,000
- Excluded income: \$20,000 (\$25,000 in financial assistance - \$20,000 in actual covered costs)
- Included income: \$5,000

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.

Example 2

- Actual covered costs: \$25,000
- Title IV HEA assistance: \$26,000
- Title IV HEA assistance covers the students entire actual covered costs.
- Other Student Financial Assistance: \$5,000
- Excluded income: The entire Title IV HEA assistance of \$26,000
- Included income: All other financial assistance of \$5,000

If the amount of assistance excluded under Title IV of the HEA is less than the actual covered costs, the PHA will exclude the amount of other student financial assistance up to the amount of the remaining actual covered costs.

Example 3

- Actual covered costs: \$22,000
- Title IV HEA assistance: \$15,000
- The remaining amount not covered by Title IV HEA assistance is \$7,000 (\$22,000 in actual covered costs - \$15,000 in Title IV HEA assistance).
- Other Student Financial Assistance: \$5,000
- \$7,000 in remaining actual covered costs - \$5,000 in other financial assistance
- Excluded income: \$15,000 entire amount of the Title IV HEA Assistance + \$5,000 in other financial assistance.
- Included income: \$0

Example 4

- Actual covered costs: \$18,000
- Title IV HEA Assistance: \$15,000
- The remaining amount not covered by Title IV HEA assistance is \$3,000 (\$18,000 in actual covered costs - \$15,000 in Title IV HEA Assistance)
- Other student Financial Assistance: \$5,000
- When other student financial assistance is applied, financial assistance exceeds actual covered costs by \$2,000 (\$3,000 in actual covered costs - \$5,000 in other financial assistance).
- Included income: \$2,000 (the amount by which the financial aid exceeds the student's actual covered costs).

ASSETS [24 CFR 5.609(b)(3); 24 CFR 5.603(b)]

Overview

There is no asset limitation for participation in the HCV program. However, HUD requires that the PHA include in annual income the anticipated “interest, dividends, and other net income of any kind from real or personal property” [24 CFR 5.609(b)(3)]. This section discusses how the income from various types of assets is determined. For most types of assets, the PHA must determine the value of the asset to compute income from the asset. Therefore, for each asset type, this section discusses:

- How the value of the asset will be determined
- How income from the asset will be calculated

Exhibit 6-1 provides the regulatory requirements for calculating income from assets [24 CFR 5.609(b)(3)] and Exhibit 6-3 provides the regulatory definition of *net family assets*. This section begins with a discussion of general policies related to assets and then provides HUD rules and PHA policies related to each type of asset.

Optional policies for family self-certification of assets are found in Chapter 7.

General Policies

Income from Assets

The PHA generally will use current circumstances to determine both the value of an asset and the anticipated income from the asset. As is true for all sources of income, HUD authorizes the PHA to 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.

PHA Policy

Anytime 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.

Valuing Assets

~~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.~~

PHA Policy

~~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 [HCV GB, p. 5-28].~~

6-I.H. PERIODIC PAYMENTS

Periodic payments are forms of income received on a regular basis. ~~HUD regulations specify periodic payments that are not included in annual income. Regulations do not specify which types of periodic payments are included in annual income.~~

~~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. Income that has a discrete end date and will not be repeated beyond the coming year is excluded from a family's annual income because it is nonrecurring income. For example, a family receives income from a guaranteed income program in their city that has a discrete beginning and end date. While the guaranteed income will be repeated in the coming year, it will end before the family's next annual reexamination. This income is fully excluded from annual income.~~

However, this does not include unemployment income and other types of periodic payments that are received at regular intervals (such as weekly, monthly, or yearly) ~~for a period of greater than one year that can be extended~~. Unemployment income and other types of periodic payments are not considered nonrecurring income, unless explicitly excluded from income under 25 CFR 5.609(b), and thus they are included in annual income.

~~For example, a family receives income from a guaranteed income program in their city that has a discrete beginning and end date. While the guaranteed income will be repeated in the coming year, it will end before the family's next annual reexamination. This income is fully excluded from annual income.~~

Insurance payments and settlements for personal or property losses, including but not limited to payments under health insurance, motor vehicle insurance, and workers' compensation, are excluded from annual income. ~~Any workers' compensation is always excluded from annual income, regardless of the frequency or length of the payments. However, periodic payments paid at regular intervals (such as weekly, monthly, or yearly) for a period of greater than one year that are received in lieu of wages for workers' compensation are included in annual income. Payments received in lieu of wages for worker's compensation are excluded, even if paid in periodic payments, if the income will last for a period of less than one year.~~

Lump-Sum Payments for the Delayed Start of a Periodic Payment [24 CFR 5.609(b)(16)]

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 (VA) disability benefits that are received in a lump sum amount or in prospective monthly amounts are excluded from annual income.

PHA Policy

The PHA will include in annual income lump sums received as a result of delays in processing periodic payments (other than those specifically excluded by the regulation), such as unemployment or welfare assistance.

When a delayed-start payment is received that is to be included and the family reports this during the period in which the PHA is processing an annual reexamination, the PHA will adjust the family's rent retroactively for the period the payment was intended to cover.

If the delayed-start payment is received outside of the time the PHA is processing an annual reexamination, then the PHA will consider whether the amount meets the threshold to conduct an

interim reexamination. If so, the PHA will conduct an interim in accordance with PHA policies in Chapter 11. If not, the PHA will consider the amount when processing the family's next annual recertification.

Retirement Accounts [24 CFR 5.609(b)(26); Notice PIH 2023-27]

Income received from 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 is not considered actual income from assets.

However, any distribution of periodic payments from such accounts is included in annual income at the time they are received by the family.

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.

Social Security Benefits [Notice PIH 2018-24]

The PHA is required to use the gross benefit amount to calculate annual income from Social Security benefits.

Annually in October, the Social Security Administration (SSA) announces the cost-of-living adjustment (COLA) by which federal Social Security and SSI benefits are adjusted to reflect the increase, if any, in the cost of living. The federal COLA does not apply to state-paid disability benefits. Effective the day after the SSA has announced the COLA, PHAs are required to factor in the COLA when determining Social Security and SSI annual income for all annual reexaminations and interim reexaminations of family income that have not yet been completed and will be effective January 1 or later of the upcoming year [Notice PIH 2023-27]. When a family member's benefits are garnished, levied, or withheld to pay restitution, child support, tax debt, student loan debt, or other debts, the PHA must use the gross amount of the income, prior to the reduction, to determine a family's annual income.

PHA Policy

Annual income includes "all amounts received," not the amount that a family may be legally entitled to receive but which they do not receive. When the SSA overpays an individual, resulting in a withholding or deduction from their benefit amount until the overpayment is paid in full, the PHA will use the reduced benefit amount after deducting only the amount of the overpayment withholding from the gross benefit amount.

Alimony and Child Support

PHA Policy

The PHA will count all regular payments of alimony or child support awarded as part of a divorce or separation agreement.

The PHA will count court-awarded amounts for alimony and child support unless the family certifies and the PHA verifies that the payments are not being made.

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.**

If payments are being made regularly, the PHA will use the amount received during the last 12 months (excluding any lump sums received). If payments have been made for a period less than 12 months, the PHA will average all payments that have been made.

At new admission or interim recertification, if any lump sum payments were made in the past 12 months, the PHA will determine the likelihood of the family receiving another similar payment within the next 12 months before deciding whether 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.

6-I.I. NONRECURRING INCOME [24 CFR 5.609(b)(24) and Notice PIH 2023-27]

Income received as an independent contractor, day laborer, or seasonal worker is not excluded from income as nonrecurring income, even if the source, date, or amount of the income varies.

Income that has a discrete end date and will not be repeated beyond the coming year during the family's upcoming annual reexamination period will be excluded from a family's annual income as nonrecurring income. This exclusion does not include unemployment income and other types of periodic payments that are received at regular intervals (such as weekly, monthly, or yearly) ~~for a period of greater than one year that can be extended.~~

Income amounts excluded under this category may include, but are not limited to:

- Nonrecurring payments made to the family or to a third party on behalf of the family to assist with utilities.
- Payments for eviction prevention.
- Security deposits to secure housing.
- Payments for participation in research studies (depending on the duration); and
- General one-time payments received by or on behalf of the family.

Nonrecurring income that is excluded under the regulations includes:

- Payments from the U.S. Census Bureau for employment (relating to decennial census or the American Community Survey) lasting no longer than 180 days and not culminating in permanent employment [24 CFR 5.609(b)(24)(i)].
- Direct federal or state payments intended for economic stimulus or recovery [24 CFR 5.609(b)(24)(ii)].
- Amounts directly received by the family as a result of state refundable tax credits or state or federal tax refunds at the time they are received [24 CFR 5.609(b)(24)(iii) and (iv)].
- Gifts for holidays, birthdays, or other significant life events or milestones (e.g., wedding gifts, baby showers, anniversaries) [24 CFR 5.609(b)(24)(v)].
- Non-monetary, in-kind donations, such as food, clothing, or toiletries, received from a food bank or similar organization [24 CFR 5.609(b)(24)(vi)]. When calculating annual income, PHAs are prohibited from assigning monetary value to **such** non-monetary in-kind donations received by the family [Notice PIH 2023-27]. Non-recurring, non-monetary in-kind donations from friends and family are excluded as non-recurring income. **However, the value of regular in-kind donations (such as the value of groceries) received by friends and family are included.**
- ~~Lump-sum~~ additions to net family assets, including but not limited to lottery or other contest winnings [24 CFR 5.609(b)(24)(vii)].

6-I.J. WELFARE ASSISTANCE

Overview

Welfare assistance is counted in annual income. Welfare assistance includes Temporary Assistance for Needy Families (TANF) and any payments to individuals or families based on need that are made under programs funded separately or jointly by federal, state, or local governments.

Sanctions Resulting in the Reduction of Welfare Benefits [24 CFR 5.615]

The PHA must make a special calculation of annual income when the welfare agency imposes certain sanctions on certain families. The full text of the regulation at 24 CFR 5.615 is provided as Exhibit 6-3. The requirements are summarized below. This rule applies only if a family was receiving HCV assistance at the time the sanction was imposed.

Covered Families

The families covered by 24 CFR 5.615 are those “who receive welfare assistance or other public assistance benefits (‘welfare benefits’) from a State or other public agency (‘welfare agency’) under a program for which Federal, State or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for such assistance” [24 CFR 5.615(b)]

Imputed Income

When a welfare agency imposes a sanction that reduces a family’s welfare income because the family commits fraud or fails to comply with the agency’s economic self-sufficiency program or work activities requirement, the PHA must include in annual income “imputed” welfare income. The PHA must request that the welfare agency provide the reason for the reduction of benefits and the amount of the reduction of benefits. The imputed welfare income is the amount that the benefits were reduced as a result of the sanction.

This requirement does not apply to reductions in welfare benefits: (1) at the expiration of the lifetime or other time limit on the payment of welfare benefits, (2) if a family member is unable to find employment even though the family member has complied with the welfare agency economic self-sufficiency or work activities requirements, or (3) because a family member has not complied with other welfare agency requirements [24 CFR 5.615(b)(2)].

Offsets

The amount of the imputed welfare income is offset by the amount of additional income the family begins to receive after the sanction is imposed. When the additional income equals or exceeds the imputed welfare income, the imputed income is reduced to zero [24 CFR 5.615(c)(4)].

6-I.K. STATE PAYMENTS TO ALLOW INDIVIDUALS WITH DISABILITIES TO LIVE AT HOME [24 CFR 5.609(b)(19)]

Payments made by or authorized by a state Medicaid agency (including through a managed care entity) or other state or federal agency to an assisted family to enable a member of the assisted family who has a disability to reside in the family's assisted unit are excluded.

Authorized payments may include payments to a member of the assisted family through state Medicaid-managed care systems, other state agencies, federal agencies, or other authorized entities.

The payments must be received for caregiving services a family member provides to enable another member of the assisted family who has a disability to reside in the family's assisted unit. Payments to a family member for caregiving services for someone who is not a member of the assisted family (such as for a relative that resides elsewhere) are not excluded from income.

Furthermore, if the agency is making payments for caregiving services to the family member for an assisted family member and for a person outside of the assisted family, only the payments attributable to the caregiving services for the caregiver's assisted family member would be excluded from income.

6-I.L. CIVIL RIGHTS SETTLEMENTS [24 CFR 5.609(b)(25); FR Notice 2/14/23]

Regardless of how the settlement or judgment is structured, civil rights settlements or judgments, including settlements or judgments for back pay, are excluded from annual income. This may include amounts received because of litigation or other actions, such as conciliation agreements, voluntary compliance agreements, consent orders, other forms of settlement agreements, or administrative or judicial orders under the Fair Housing Act, Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act (Section 504), the Americans with Disabilities Act, or any other civil rights or fair housing statute or requirement.

While these civil rights settlement or judgment amounts are excluded from income, the settlement or judgment amounts will generally be counted toward the family's net family assets (e.g., if the funds are deposited into the family's savings account or a revocable trust under the control of the family or some other asset that is not excluded from the definition of *net family assets*). Income generated on the settlement or judgment amount after it has become a net family asset is not excluded from income. For example, if the family received a settlement or back pay and deposited the money in an interest-bearing savings account, the interest from that account would be income at the time the interest is received.

Furthermore, if a civil rights settlement or judgment increases the family's net family assets such that they exceed **\$50,000 the HUD-published threshold amount (as annually adjusted by an inflationary factor \$50,000 for 2024, and \$51,600 for 2025)**, then income will be imputed on the net family assets pursuant to 24 CFR 5.609(a)(2). If the imputed income, which HUD considers unearned income, increases the family's annual adjusted income by 10 percent or more, then an interim reexamination of income will be required unless the addition to the family's net family assets occurs within the last three months of the family's income certification period and the PHA or owner chooses not to conduct the examination.

6-I.M. ADDITIONAL EXCLUSIONS FROM ANNUAL INCOME [24 CFR 5.609(b); FR Notice 1/31/2024]

Other exclusions contained in 24 CFR 5.609(b) and FR Notice 1/31/24 that have not been discussed earlier in this chapter include the following:

- Payments received for the care of foster children or foster adults or state or tribal kinship or guardianship care payments [24 CFR 5.609(b)(4)].
- Insurance payments and settlements for personal or property losses, including but not limited to payments through health insurance, motor vehicle insurance, and workers' compensation [24 CFR 5.609(b)(5)]. However, periodic payments paid at regular intervals (such as weekly, monthly, or yearly) for a period of greater than one year that are received in lieu of wages ~~for workers' compensation~~ are included in annual income [Notice PIH 2023-27].
- Amounts received by the family that are specifically for, or in reimbursement of, the cost of health and medical care expenses for any family member [24 CFR 5.609(b)(6)].
- 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 member of the family becoming disabled [24 CFR 5.609(b)(7)].
- Income and distributions from any Coverdell education savings account under Section 530 of the Internal Revenue Code of 1986 or any qualified tuition program under Section 529 of such Code [24 CFR 5.609(b)(10)].
- Income earned by government contributions to, and distributions from, "baby bond" accounts created, authorized, or funded by federal, state, or local government [24 CFR 5.609(b)(10)].
- The special pay to a family member serving in the Armed Forces who is exposed to hostile fire [24 CFR 5.609(b)(11)].
- Payments related to aid and attendance ~~under 38 U.S.C. 1521~~ to veterans in need of regular aid and attendance [24 CFR 5.609(b)(17)]. This income exclusion applies only to veterans in need of regular aid and attendance and not to other beneficiaries of the payments, such as a surviving spouse [Notice PIH 2023-27].
- Loan proceeds (the net amount disbursed by a lender to or on behalf of a borrower, under the terms of a loan agreement) received by the family or a third party (e.g., proceeds received by the family from a private loan to enable attendance at an educational institution or to finance the purchase of a car) [24 CFR 5.609(b)(20)]. The loan borrower or co-borrower must be a member of the family for this income exclusion to be applicable [Notice PIH 2023-27].
- Payments received by tribal members as a result of claims relating to the mismanagement of assets held in trust by the United States, to the extent such payments are also excluded from gross income under the Internal Revenue Code or other federal law [24 CFR 5.609(b)(21)]. Generally, payments received by tribal members in excess of the first \$2,000 of per capita shares are included in a family's annual income for purposes of determining eligibility. However, as explained in Notice PIH 2023-27, payments made under the Cobell Settlement, and certain per capita payments under the recent Tribal Trust Settlements, must be excluded from annual income ~~in HUD programs that adopt the definitions of annual income in~~

~~24 CFR 5.609, the Census Long Form, and the IRS Form 1040, including the programs affected by Notice PIH 2023-27.~~

- Replacement housing “gap” payments made in accordance with 49 CFR Part 24 that offset increased out of pocket costs of displaced persons that move from one federally subsidized housing unit to another federally subsidized housing unit. Such replacement housing “gap” payments are not excluded from annual income if the increased cost of rent and utilities is subsequently reduced or eliminated, and the displaced person retains or continues to receive the replacement housing “gap” payments [24 CFR 5.609(b)(23)].
- Income earned on amounts placed in a family’s Family Self-Sufficiency account [24 CFR 5.609(b)(27)].
- Amounts received by participants in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred e.g., special equipment, clothing, transportation, childcare, ~~re, ee~~etc.) and which are made solely to allow participation in a specific program [24 CFR 5.609(i)(12)(ii)].
- Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS) [(24 CFR 5.609(b)(12)(i)].
- Amounts received under a resident service stipend not to exceed \$200 per month. A resident service stipend is a modest amount received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development [24 CFR 5.609 I(12)(ii)].

Incremental earnings and benefits to any family member resulting from participation in qualifying training program funded by HUD or in qualifying federal, state, tribal, or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff are excluded from annual income. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the training program unless those amounts are excluded under 24 CFR 5.609(b)(9)(i) [24 CFR 5.609(b)(12)(iv)].

PHA Policy

The PHA defines *training program* as “a learning process with goals and objectives, generally having a variety of components, and taking place in a series of sessions over a period. It is designed to lead to a higher level of proficiency, and it enhances the individual’s ability to obtain employment. It may have performance standards to measure proficiency. Training may include but is not limited to: (1) classroom training in a specific occupational skill, (2) on-the-job training with wages subsidized by the program, or (3) basic education” [expired Notice PIH 98-2, p. 3].

The PHA defines *incremental earnings and benefits* as the difference between (1) the total amount of welfare assistance and earnings of a family member prior to enrollment in a training program and (2) the total amount of welfare assistance and earnings of the family member after enrollment in the program [expired Notice PIH 98-2, pp. 3–4].

In calculating the incremental difference, the PHA will use as the pre-enrollment income the total annualized amount of the family member’s welfare assistance and earnings reported on the family’s most recently completed HUD-50058.

End of participation in a training program must be reported in accordance with the PHA's interim reporting requirements (see Chapter 11).

- Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era [24 CFR 5.609(b)(13)].
- Adoption assistance payments for a child in excess of the amount of the dependent deduction per adopted child [24 CFR 5.609(b)(15)].
- Refunds or rebates on property taxes paid on the dwelling unit [24 CFR 5.609(b)(20)].
- Amounts that HUD is required by federal statute to exclude from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in 24 CFR 5.609(b) apply. HUD will publish a notice in the *Federal Register* to identify the benefits that qualify for this exclusion. Updates will be published when necessary.

HUD publishes an updated list of these exclusions periodically. The most recent list of exclusions was published in the *Federal Register* on ~~May 20, 2014~~ January 31, 2024. It includes:

- (a) The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 2017 (b)). **This exclusion also applies to assets.**
- (b) Benefits under Section 1780 of the **Richard B. Russell** School Lunch Act and Child Nutrition Act of 1966, including WIC **and reduced-price lunches.**
- (c) Payments, **including for supportive services and reimbursement of out-of-pocket expenses,** to volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058). **The exclusion also applies to assets.**
 - **Except, the exclusion does not apply when the Chief Executive Officer of the Corporation for National and Community Service determines that the value of all such payments, adjusted to reflect the number of hours such volunteers are serving, is equivalent to or greater than the minimum wage then in effect under the Fair Labor Standards Act of 1938 (29 U.S.C. 201 et seq.) or the minimum wage, under the laws of the State where such volunteers are serving, whichever is the greater (42 U.S.C. 5044(f)(1)).**
- (d) **Certain** payments received under the Alaska Native Claims Settlement Act (43 U.S.C. 1626(c)).
- (e) Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes (25 U.S.C. **5506**).
- (f) Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program (42 U.S.C. 8624(f)(1)).
- (g) **Allowances, earnings, and payments to individuals participating in programs under the Workforce Investment Act of 1998 which was reauthorized as the Workforce Innovation and Opportunity Act of 2014 (29 U.S.C. 3241(a)(2)).** ~~Payments received under programs funded in whole or in part under the Workforce Investment Act of 1998 (29 U.S.C. 2931)~~

- (h) Deferred disability benefits from the Department of Veterans Affairs, whether received as a lump sum or in monthly prospective amounts.
- (i) Income derived from the disposition of funds to the Grand River Band of Ottawa Indians (Pub. L. 94-540, 90 ~~Section 6 Stat. 2503-04~~).
- (j) Payments, funds, or distributions authorized, established, or directed by the Seneca Nation Settlement Act of 1990 (25 U.S.C. 1774f(b)).
- (k) A lump sum or periodic payment received by an individual Indian pursuant to the Class Action Settlement Agreement in the United States District Court case entitled *Elouise Cobell et al. v. Ken Salazar et al.*, for a period of one year from the time of receipt of that payment as provided in the Claims Resolution Act of 2010.

(l) The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U. S. Claims Court, the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands (25 U.S.C. 1407-1408). **This exclusion does not include proceeds of gaming operations regulated by the Commission (25 U.S.C. 1407–1408).**

~~(m) — Benefits under the Indian Veterans Housing Opportunity Act of 2010 (only applies to Native American housing programs)~~

~~(ma)~~ Payments received from programs funded under Title V of the Older Americans Act of 1965 (42 U.S.C. 3056(f)).

~~(ne)~~ Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in *In Re Agent Orange* product liability litigation, M.D.L. No. 381 (E.D.N.Y.) **This exclusion also applies to assets.**

~~(op)~~ Payments received under 38 U.S.C. 1833~~(e)(c)~~ to children of Vietnam veterans born with spinal bifida, children of women Vietnam veterans born with certain birth defects, and children of certain Korean and Thailand service veterans born with spinal bifida (42 U.S.C. 12637(d)).

~~(pq)~~ Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721). **This exclusion also applies to assets.**

~~(qr)~~ The value of any childcare provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Childcare and Development Block Grant Act of 1990 (42 U.S.C. 9858q).

~~(rs)~~ Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26 U.S.C. 32(j)). **This exclusion also applies to assets.**

~~(st)~~ Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation (Pub. L. 95-433) **This exclusion also applies to assets.**

~~(tu)~~ Amounts of student financial assistance scholarships funded under Title IV of the Higher Education Act of 1965j, including awards under federal work-study programs or under the Bureau of Indian Affairs student assistance programs (20 U.S.C. 1087uu). For Section 8 programs, **only, any financial assistance in excess of amounts received by an individual for tuition and any other required fees and charges under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or an institution of higher education (as defined under the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income if the individual is over the age of 23 with dependent children (Pub. L. 109–115, section 327 (as amended)).**~~the exception found in § 237 of Public Law 109–249 applies and requires that the amount of financial assistance in excess of tuition and mandatory fees shall be considered income in accordance with the provisions codified at 24 CFR 5.609(b)(9), except for those persons with disabilities as defined by 42 U.S.C. 1437a(b)(3)(E) (Pub. L. 109–249) (See Section 6-I.L. for exceptions.)~~

~~(uv)~~ Allowances, earnings, and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d)).

~~(vw)~~ Any amount of crime victim compensation ~~(that provides medical or other assistance (or payment or reimbursement of the cost of such assistance) under the Victims of Crime Act of 1984 received through a crime victim assistance program, unless the total amount of assistance that the applicant receives from all~~

such programs is sufficient to fully compensate the applicant for losses suffered as a result of the crime (34 U.S.C. 20102(c)). ~~—under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act (42 U.S.C. 10602)~~

~~(wx)~~ Any amounts in an “individual development account” are excluded from assets and any assistance, benefit, or amounts earned by or provided to the individual development account are excluded from income, as provided by the Assets for Independence Act, as amended (42 U.S.C. 604(h)(4)). ~~“individual development account” as provided by the Assets for Independence Act, as amended in 2002~~

~~(y)~~ ~~Payments made from the proceeds of Indian tribal trust cases as described in Notice PIH 2013-30, “Exclusion from Income of Payments under Recent Tribal Trust Settlements” (25 U.S.C. 117b(a))~~

~~(xz)~~ Major disaster and emergency assistance received under the Robert T. Stafford Disaster Relief and Emergency Assistance Act and comparable disaster assistance provided by states, local governments, and disaster assistance organizations. ~~This exclusion also applies to assets.~~

~~(yaa)~~ Distributions from an ABLE account, distributions from and certain contributions to an ABLE account established under the ABLE Act of 2014 (Pub. L. 113-295.), as described in Notice PIH 2019-09 or subsequent or superseding notice is excluded from income and assets. ~~and actual or imputed interest on the ABLE account balance [See also Notice PIH 2019-09]~~

~~(z)~~ The amount of any refund (or advance payment with respect to a refundable credit) issued under the Internal Revenue Code is excluded from income and assets for a period of 12 months from receipt (26 U.S.C. 6409).

~~(aa)~~ Assistance received by a household under the Emergency Rental Assistance Program pursuant to the Consolidated Appropriations Act, 2021 (Pub. L. 116-260, section 501(j)), and the American Rescue Plan Act of 2021.

~~(ab)~~ Per capita payments made from the proceeds of Indian Tribal Trust Settlements listed in IRS Notice 2013-1 and 2013-55 must be excluded from annual income unless the per capita payments exceed the amount of the original Tribal Trust Settlement proceeds and are made from a Tribe’s private bank account in which the Tribe has deposited the settlement proceeds. Such amounts received in excess of the Tribal Trust Settlement are included in the gross income of the members of the Tribe receiving the per capita payments as described in IRS Notice 2013-1. The first \$2,000 of per capita payments are also excluded from assets unless the per capita payments exceed the amount of the original Tribal Trust Settlement proceeds and are made from a Tribe’s private bank account in which the Tribe has deposited the settlement proceeds (25 U.S.C. 117b(a), 25 U.S.C. 1407).

~~(ac)~~ Any amounts (i) not actually received by the family, (ii) that would be eligible for exclusion under 42 U.S.C. 1382b(a)(7), and (iii) received for service-connected disability under 38 U.S.C. Chapter 11 or dependency and indemnity compensation under 38 U.S.C. Chapter 13 (25 U.S.C. 4103(9)(C)) as provided by an amendment by the Indian Veterans Housing Opportunity Act of 2010 (Pub. L. 111-269 section 2) to the definition of income applicable to programs under the Native American Housing Assistance and Self-Determination Act (NAHASDA) (25 U.S.C. 4101 et seq.).

Lump-Sum Receipts

Payments that are received in a single lump sum, such as inheritances, capital gains, lottery winnings, insurance settlements, and proceeds from the sale of property, are generally considered assets, not income. However, such lump-sum receipts are counted as assets only if they are retained by a family in a form recognizable as an asset (e.g., deposited in a savings or checking account) [RHHP FAQs]. (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.)

Imputing Income from Assets [24 CFR 5.609(b)(3), Notice PHH 2012-29]

When net family assets are \$5,000 or less, the PHA will include in annual income the actual income anticipated to be derived from the assets. When the family has net family assets in excess of \$5,000, the PHA will include in annual income the greater of (1) the actual income derived from the assets or (2) the imputed income. Imputed income from assets is calculated by multiplying the total cash value of all family assets by an average passbook savings rate as determined by the PHA.

- ~~Note: The HUD field office no longer provides an interest rate for imputed asset income. The “safe harbor” is now for the PHA to establish a passbook rate within 0.75 percent of a national average.~~
- ~~The PHA must review its passbook rate annually to ensure that it remains within 0.75 percent of the national average.~~

PHA Policy

~~The PHA initially set the imputed asset passbook rate at the national rate established by the Federal Deposit Insurance Corporation (FDIC).~~

~~The PHA will review the passbook rate annually. The rate will not be adjusted unless the current PHA rate is no longer within 0.75 percent of the national rate. If it is no longer within 0.75 percent of the national rate, the passbook rate will be set at the current national rate.~~

~~The effective date of changes to the passbook rate will be determined at the time of the review.~~

~~Determining Actual Anticipated Income from Assets~~

~~It may or may not be necessary for the PHA to use the value of an asset to compute the actual anticipated income from the asset. When the value is required to compute the anticipated income from an asset, the market value of the asset is used. For example, if the asset is a property for which a family receives rental income, the anticipated income is determined by annualizing the actual monthly rental amount received for the property; it is not based on the property's market value. However, if the asset is a savings account, the anticipated income is determined by multiplying the market value of the account by the interest rate on the account.~~

~~Withdrawal of Cash or Liquidation of Investments~~

~~Any withdrawal of cash or assets from an investment will be included in income except to the extent that the withdrawal reimburses amounts invested by the family. For example, when a family member retires, the amount received by the family from a retirement investment plan is not counted as income until the family has received payments equal to the amount the family member deposited into the retirement investment plan.~~

~~Jointly Owned Assets~~

~~The regulation at 24 CFR 5.609(a)(4) specifies that annual income includes "amounts derived (during the 12-month period) from assets to which any member of the family has access."~~

PHA Policy

~~If an asset is owned by more than one person and any family member has unrestricted access to the asset, the PHA will count the full value of the asset. A family member has unrestricted access to an asset when he or she can legally dispose of the asset without the consent of any of the other owners.~~

~~If an asset is owned by more than one person, including a family member, but the family member does not have unrestricted access to the asset, the PHA will prorate the asset according to the percentage of ownership. If no percentage is specified or provided for by state or local law, the PHA will prorate the asset evenly among all owners.~~

Assets Disposed of for Less than Fair Market Value [24 CFR 5.603(b)]

~~HUD regulations require the PHA to count as a current asset any business or family asset that was disposed of for less than fair market value during the two years prior to the effective date of the examination/reexamination, except as noted below.~~

Minimum Threshold

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].

PHA Policy

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.

When the two-year period expires, the income assigned to the disposed asset(s) also expires. If the two-year period ends between annual recertifications, the family may request an interim recertification to eliminate consideration of the asset(s).

Assets placed by the family in nonrevocable trusts are considered assets disposed of for less than fair market value except when the assets placed in trust were received through settlements or judgments.

Separation or Divorce

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

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

Assets are not considered disposed of for less than fair market value when the disposition is the result of a foreclosure or bankruptcy sale.

Family Declaration

PHA Policy

Families must sign a declaration form at initial certification and each annual recertification identifying all assets that have been disposed of 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.

Types of Assets

Checking and Savings Accounts

For regular checking accounts and savings accounts, *cash value* has the same meaning as *market value*. If a checking account does not bear interest, the anticipated income from the account is zero.

PHA Policy

In determining the value of checking account and savings accounts, the PHA will use the current balance.

In determining the anticipated income from an interest-bearing checking or savings account, the PHA will multiply the value of the account by the current rate of interest paid on the account.

Investment Accounts Such as Stocks, Bonds, Saving Certificates, and Money Market Funds

Interest or dividends earned by investment accounts are counted 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.

PHA Policy

In determining the market value of an investment account, the PHA will use the value of the account on the most recent investment report.

How anticipated income from an investment account will be calculated depends on whether the rate of return is known.

For assets that are held in an investment account with a known rate of return (e.g., savings certificates), asset income will be calculated based on that known rate (market value multiplied by rate of earnings).

When the anticipated rate of return is not known (e.g., stocks), the PHA will calculate asset income based on the earnings for the most recent reporting period.

Equity in Real Property or Other Capital Investments

Equity (cash value) in a property or other capital asset is the estimated current market value of the asset less the unpaid balance on all loans secured by the asset and reasonable costs (such as broker fees) that would be incurred in selling the asset [HCV GB, p. 5-25].

PHA Policy

In determining the equity, the PHA will determine market value by examining recent sales of at least three properties in the surrounding or similar neighborhood that possess comparable factors that affect market value.

The PHA will first use the payoff amount for the loan (mortgage) as the unpaid balance to calculate equity. If the payoff amount is not available, the PHA will use the basic loan balance information to deduct from the market value in the equity calculation.

Equity in real property and other capital investments is considered in the calculation of asset income **except** for the following types of assets:

Equity accounts in HUD homeownership programs [24 CFR 5.603(b)]

- The value of a home currently being purchased with assistance under the HCV program Homeownership Option for the first 10 years after the purchase date of the home [24 CFR 5.603(b), Notice PIH 2012-3]
- Equity in owner-occupied cooperatives and manufactured homes in which the family lives [HCV GB, p. 5-25]
- Equity in real property when a family member's main occupation is real estate [HCV GB, p. 5-25]. This real estate is considered a business asset, and income related to this asset will be calculated as described in section 6-I.F.
- Interests in Indian Trust lands [24 CFR 5.603(b)]
- Real property and capital assets that are part of an active business or farming operation [HCV GB, p. 5-25]

The PHA must also deduct from the equity the reasonable costs for converting the asset to cash. Using the formula for calculating equity specified above, the net cash value of real property is the market value minus the balance of the loan (mortgage) minus the expenses to convert to cash [Notice PIH 2012-3].

PHA Policy

For the purposes of calculating expenses to convert to cash for real property, the PHA will use ten percent of the market value of the home.

A family may have real property as an asset in two ways: (1) owning the property itself and (2) holding a mortgage or deed of trust on the property. In the case of a property owned by a family member, the anticipated asset income generally will be in the form of rent or other payment for the use of the property. If the property generates no income, actual anticipated income from the asset will be zero.

In the case of a mortgage or deed of trust held by a family member, the outstanding balance (unpaid principal) is the cash value of the asset. The interest portion only of payments made to the family in accordance with the terms of the mortgage or deed of trust is counted as anticipated asset income.

PHA Policy

In the case of capital investments owned jointly with others not living in a family's unit, a prorated share of the property's cash value will be counted as an asset unless the PHA determines that the family receives no income from the property and is unable to sell or otherwise convert the asset to cash.

Trusts

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).

Revocable Trusts

If any member of a family has the right to withdraw the funds in a trust, the value of the trust is considered an asset [HCV GB, p. 5-25]. Any income earned as a result of investment of trust funds is counted as actual asset income, whether the income is paid to the family or deposited in the trust.

Nonrevocable Trusts

In cases where a trust is not revocable by, or under the control of, any member of a family, the value of the trust fund is not considered an asset. However, any income distributed to the family from such a trust is counted as a periodic payment or a lump-sum receipt, as appropriate [24 CFR 5.603(b)]. (Periodic payments are covered in section 6-I.H. Lump-sum receipts are discussed earlier in this section.)

Retirement Accounts

Company Retirement/Pension Accounts

In order to correctly include or exclude as an asset any amount held in a company retirement or pension account by an employed person, the PHA must know whether the money is accessible before retirement [HCV GB, p. 5-26].

While a family member is employed, only the amount the family member can withdraw without retiring or terminating employment is counted as an asset [HCV GB, p. 5-26].

After a family member retires or terminates employment, any amount distributed to the family member is counted as a periodic payment or a lump-sum receipt, as appropriate [HCV GB, p. 5-26], except to the extent that it represents funds invested in the account by the family member. (For more on periodic payments, see section 6-I.H.) The balance in the account is counted as an asset only if it remains accessible to the family member.

IRA, Keogh, and Similar Retirement Savings Accounts

IRA, Keogh, and similar retirement savings accounts are counted as assets even though early withdrawal would result in a penalty [HCV GB, p. 5-25].

Personal Property

Personal property held as an investment, such as gems, jewelry, coin collections, antique cars, etc., is considered an asset [HCV GB, p. 5-25].

PHA Policy

In determining the value of personal property held as an investment, the PHA will use the family's estimate of the value. The PHA may obtain an appraisal to confirm the value of the asset 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.

Generally, personal property held as an investment generates no income until it is disposed of. If regular income is generated (e.g., income from renting the personal property), the amount that is expected to be earned in the coming year is counted as actual income from the asset.

Necessary items of personal property are not considered assets [24 CFR 5.603(b)].

PHA Policy

Necessary personal property consists of only those items not held as an investment, and may include clothing, furniture, household furnishings, jewelry, and vehicles, including those specially equipped for persons with disabilities.

Life Insurance

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 [HCV GB 5-25]. The cash value is the surrender value. If such a policy earns dividends or interest that the family could elect to receive, the anticipated amount of dividends or interest is counted as income from the asset whether or not the family actually receives it.

6-I.H. PERIODIC PAYMENTS

Periodic payments are forms of income received on a regular basis. HUD regulations specify periodic payments that are and are not included in annual income.

Periodic Payments Included in Annual Income

- ~~Periodic payments from sources such as social security, unemployment and welfare assistance, annuities, insurance policies, retirement funds, and pensions. However, periodic payments from retirement accounts, annuities, and similar forms of investments are counted only after they exceed the amount contributed by the family [24 CFR 5.609(b)(4) and (b)(3)].~~
- ~~Disability or death benefits and lottery receipts paid periodically, rather than in a single lump sum [24 CFR 5.609(b)(4) and HCV, p. 5-14].~~

Lump-Sum Payments for the Delayed Start of a Periodic Payment

Most lump-sums received as a result of delays in processing periodic payments, such as unemployment or welfare assistance, are counted as income. However, lump-sum receipts for the delayed start of periodic social security or supplemental security income (SSI) payments are not counted as income. Additionally, any deferred disability benefits that are received in a lump sum or in prospective monthly amounts from the Department of Veterans Affairs are to be excluded from annual income [24 CFR 5.609(e)(14)].

PHA Policy

The PHA will include in annual income lump sums received as a result of delays in processing periodic payments (other than those specifically excluded by the regulation), such as unemployment or welfare assistance.

When a delayed-start payment is received and reported during the period in which the PHA is processing an annual reexamination, the PHA will adjust the family share and PHA subsidy retroactively for the period the payment was intended to cover. The family may pay in full any amount due or request to enter into a repayment agreement with the PHA.

If the delayed-start payment is received outside of the time the PHA is processing an annual reexamination, then the PHA will consider whether the amount meets the threshold to conduct an interim reexamination. If so, the PHA will conduct an interim in accordance with PHA policies in Chapter 9. If not, the PHA will consider the amount when processing the family's next annual recertification.

Treatment of Overpayment Deductions from Social Security Benefits

The PHA must make a special calculation of annual income when the Social Security Administration (SSA) overpays an individual, resulting in a withholding or deduction from his or her benefit amount until the overpayment is paid in full. The amount and duration of the withholding will vary depending on the amount of the overpayment and the percent of the benefit rate withheld. Regardless of the amount withheld or the length of the withholding period, the PHA must use the reduced benefit amount after deducting only the amount of the overpayment withholding from the gross benefit amount [Notice PIH 2018-24].

Periodic Payments Excluded from Annual Income

- ~~Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the assisted family, who are unable to live alone) [24 CFR 5.609(e)(2)]. Kinship guardianship assistance payments (Kin-GAP) and other similar guardianship payments are treated the same as foster care payments and are likewise excluded from annual income [Notice PIH 2012-1].~~

PHA Policy

~~The PHA will exclude payments for the care of foster children and foster adults only if the care is provided through an official arrangement with a local welfare agency [HCV GB, p. 5-18].~~

- ~~Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home [24 CFR 5.609(e)(16)].~~
- ~~Amounts received under the Low Income Home Energy Assistance Program (42 U.S.C. 1626(e)) [24 CFR 5.609(e)(17)].~~
- ~~Amounts received under the Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858q) [24 CFR 5.609(e)(17)].~~
- ~~Earned Income Tax Credit (EITC) refund payments (26 U.S.C. 32(j)) [24 CFR 5.609(e)(17)]. *Note:* EITC may be paid periodically if the family elects to receive the amount due as part of payroll payments from an employer.~~
- ~~Lump sums received as a result of delays in processing Social Security and SSI payments (see section 6 I.H.) [24 CFR 5.609(e)(14)].~~
- ~~Lump sums or prospective monthly amounts received as deferred disability benefits from the Department of Veterans Affairs (VA) [24 CFR 5.609(e)(14)].~~

6-I.I. PAYMENTS IN LIEU OF EARNINGS

~~Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay, are counted as income [24 CFR 5.609(b)(5)] if they are received either in the form of periodic payments or in the form of a lump-sum amount or prospective monthly amounts for the delayed start of a periodic payment. If they are received in a one-time lump-sum (as a settlement, for instance), they are treated as lump-sum receipts [24 CFR 5.609(e)(3)]. (See also the discussion of periodic payments in section 6-I.H and the discussion of lump-sum receipts in section 6-I.G.)~~

6-I.J. WELFARE ASSISTANCE

Overview

Welfare assistance is counted in annual income. Welfare assistance includes Temporary Assistance for Needy Families (TANF) and any payments to individuals or families based on need that are made under programs funded separately or jointly by federal, state, or local governments [24 CFR 5.603(b)].

Sanctions Resulting in the Reduction of Welfare Benefits [24 CFR 5.615]

The PHA must make a special calculation of annual income when the welfare agency imposes certain sanctions on certain families. The full text of the regulation at 24 CFR 5.615 is provided as Exhibit 6-5. The requirements are summarized below. This rule applies only if a family was receiving HCV assistance at the time the sanction was imposed.

Covered Families

The families covered by 24 CFR 5.615 are those “who receive welfare assistance or other public assistance benefits (‘welfare benefits’) from a State or other public agency (‘welfare agency’) under a program for which Federal, State or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for such assistance” [24 CFR 5.615(b)]

Imputed Income

When a welfare agency imposes a sanction that reduces a family’s welfare income because the family commits fraud or fails to comply with the agency’s economic self-sufficiency program or work activities requirement, the PHA must include in annual income “imputed” welfare income. The PHA must request that the welfare agency provide the reason for the reduction of benefits and the amount of the reduction of benefits. The imputed welfare income is the amount that the benefits were reduced as a result of the sanction.

This requirement does not apply to reductions in welfare benefits: (1) at the expiration of the lifetime or other time limit on the payment of welfare benefits, (2) if a family member is unable to find employment even though the family member has complied with the welfare agency economic self-sufficiency or work activities requirements, or (3) because a family member has not complied with other welfare agency requirements [24 CFR 5.615(b)(2)].

Offsets

The amount of the imputed welfare income is offset by the amount of additional income the family begins to receive after the sanction is imposed. When the additional income equals or exceeds the imputed welfare income, the imputed income is reduced to zero [24 CFR 5.615(c)(4)].

~~6-I.K. PERIODIC AND DETERMINABLE ALLOWANCES [24 CFR 5.609(b)(7)]~~

~~Annual income includes periodic and determinable allowances, such as alimony and child support payments, and regular contributions or gifts received from organizations or from persons not residing with an assisted family.~~

~~Alimony and Child Support~~

~~The PHA must count alimony or child support amounts awarded as part of a divorce or separation agreement.~~

~~PHA Policy~~

~~The PHA will count court-awarded amounts for alimony and child support unless the PHA verifies that: (1) the payments are not being made, and (2) the family has made reasonable efforts to collect amounts due, including filing with courts or agencies responsible for enforcing payments [HCV GB, pp. 5-23 and 5-47].~~

~~Families who do not have court-awarded alimony and child support awards are not required to seek a court award and are not required to take independent legal action to obtain collection.~~

~~Regular Contributions or Gifts~~

~~The PHA must count as income regular monetary and nonmonetary contributions or gifts from persons not residing with an assisted family [24 CFR 5.609(b)(7)]. Temporary, nonrecurring, or sporadic income and gifts are not counted [24 CFR 5.609(c)(9)].~~

~~PHA Policy~~

~~Examples of regular contributions include: (1) regular payment of a family's bills (e.g., utilities, telephone, rent, credit cards, and car payments), (2) cash or other liquid assets provided to any family member on a regular basis, and (3) "in-kind" contributions such as groceries and clothing provided to a family on a regular basis.~~

~~Nonmonetary contributions will be valued at the cost of purchasing the items, as determined by the PHA. For contributions that may vary from month to month (e.g., utility payments), the PHA will include an average amount based upon past history.~~

~~6-I.L. STUDENT FINANCIAL ASSISTANCE [24 CFR 5.609(b)(9); Notice PIH 2015-21]~~

~~In 2005, Congress passed a law (for Section 8 programs only) requiring that certain student financial assistance be included in annual income. Prior to that, the full amount of student financial assistance was excluded. For some students, the full exclusion still applies.~~

~~Student Financial Assistance Included in Annual Income [24 CFR 5.609(b)(9); FR 4/10/06; Notice PIH 2015-21]~~

~~The regulation requiring the inclusion of certain student financial assistance applies only to students who satisfy all of the following conditions:~~

- ~~• They are enrolled in an institution of higher education, as defined under the Higher Education Act (HEA) of 1965.~~
- ~~• They are seeking or receiving Section 8 assistance on their own—that is, apart from their parents—through the HCV program, the project-based voucher program, or the moderate rehabilitation program.~~
- ~~• They are under 24 years of age **OR** they have no dependent children.~~

~~For students who satisfy these three conditions, any financial assistance in excess of tuition and any other required fees and charges received: (1) under the 1965 HEA, (2) from a private source, or (3) from an institution of higher education, as defined under the 1965 HEA, must be included in annual income.~~

~~To determine annual income in accordance with the above requirements, the PHA will use the definitions of *dependent child*, *institution of higher education*, and *parents* in section 3-II.E, along with the following definitions [FR 4/10/06, pp. 18148-18150]:~~

- ~~• *Assistance under the Higher Education Act of 1965* includes Pell Grants, Federal Supplement Educational Opportunity Grants, Academic Achievement Incentive Scholarships, State Assistance under the Leveraging Educational Assistance Partnership Program, the Robert G. Byrd Honors Scholarship Program, and Federal Work Study programs.~~
- ~~• *Assistance from private sources* means assistance from nongovernmental sources, including parents, guardians, and other persons not residing with the student in an HCV-assisted unit.~~
- ~~• *Tuition and fees* are defined in the same manner in which the Department of Education defines *tuition and fees* [Notice PIH 2015-21].~~
 - ~~— This is the amount of tuition and required fees covering a full academic year most frequently charged to students.~~
 - ~~— The amount represents what a typical student would be charged and may not be the same for all students at an institution.~~
 - ~~— If tuition is charged on a per-credit-hour basis, the average full-time credit hour load for an academic year is used to estimate average tuition.~~
 - ~~— Required fees include all fixed-sum charges that are required of a large proportion of all students. Examples include, but are not limited to, writing and science lab fees and fees specific to the student's major or program (i.e., nursing program).~~

- Expenses related to attending an institution of higher education must **not** be included as tuition. Examples include, but are not limited to, room and board, books, supplies, meal plans, transportation and parking, student health insurance plans, and other non-fixed-sum charges.

Student Financial Assistance Excluded from Annual Income [24 CFR 5.609(c)(6)]

Any student financial assistance not subject to inclusion under 24 CFR 5.609(b)(9) is fully excluded from annual income under 24 CFR 5.609(c)(6), whether it is paid directly to the student or to the educational institution the student is attending. This includes any financial assistance received by:

- Students residing with parents who are seeking or receiving Section 8 assistance
- Students who are enrolled in an educational institution that does **not** meet the 1965 HEA definition of *institution of higher education*
- Students who are over 23 **AND** have at least one dependent child, as defined in section 3-II.E
- Students who are receiving financial assistance through a governmental program not authorized under the 1965 HEA.

6-I.M. ADDITIONAL EXCLUSIONS FROM ANNUAL INCOME

Other exclusions contained in 24 CFR 5.609(c) that have not been discussed earlier in this chapter include the following:

- ~~Reimbursement of medical expenses [24 CFR 5.609(c)(4)]~~
- ~~Amounts received by participants in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred and which are made solely to allow participation in a specific program [24 CFR 5.609(c)(8)(iii)]~~
- ~~Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS) [(24 CFR 5.609(c)(8)(ii))]~~
- ~~Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era [24 CFR 5.609(c)(10)]~~
- ~~Adoption assistance payments in excess of \$480 per adopted child [24 CFR 5.609(c)(12)]~~
- ~~Refunds or rebates on property taxes paid on the dwelling unit [24 CFR 5.609(c)(15)]~~
- ~~Amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home [24 CFR 5.609(c)(16)]~~
- ~~Amounts specifically excluded by any other federal statute [24 CFR 5.609(c)(17), FR Notice 5/20/14]. HUD publishes an updated list of these exclusions periodically. It includes:~~
 - ~~(a) The value of the allotment provided to an eligible household under the Food Stamp Act of 1977 (7 U.S.C. 2017 (b))~~
 - ~~(b) Benefits under Section 1780 of the School Lunch Act and Child Nutrition Act of 1966, including WIC~~
 - ~~(c) Payments to volunteers under the Domestic Volunteer Services Act of 1973 (42 U.S.C. 5044(g), 5058)~~
 - ~~(d) Payments received under the Alaska Native Claims Settlement Act (43 U.S.C. 1626(c))~~
 - ~~(e) Income derived from certain submarginal land of the United States that is held in trust for certain Indian tribes (25 U.S.C. 459e)~~
 - ~~(f) Payments or allowances made under the Department of Health and Human Services' Low-Income Home Energy Assistance Program (42 U.S.C. 8624(f))~~
 - ~~(g) Payments received under programs funded in whole or in part under the Workforce Investment Act of 1998 (29 U.S.C. 2931)~~
 - ~~(h) Deferred disability benefits from the Department of Veterans Affairs, whether received as a lump sum or in monthly prospective amounts~~
 - ~~(i) Income derived from the disposition of funds to the Grand River Band of Ottawa Indians (Pub. L. 94-540, 90 Stat. 2503-04)~~

- ~~(j) Payments, funds, or distributions authorized, established, or directed by the Seneca Nation Settlement Act of 1990 (25 U.S.C. 1774f(b))~~
- ~~(k) A lump sum or periodic payment received by an individual Indian pursuant to the Class Action Settlement Agreement in the United States District Court case entitled *Elouise Cobell et al. v. Ken Salazar et al.*, for a period of one year from the time of receipt of that payment as provided in the Claims Resolution Act of 2010~~
- ~~(l) The first \$2,000 of per capita shares received from judgment funds awarded by the Indian Claims Commission or the U. S. Claims Court, the interests of individual Indians in trust or restricted lands, including the first \$2,000 per year of income received by individual Indians from funds derived from interests held in such trust or restricted lands (25 U.S.C. 1407-1408)~~
- ~~(m) Benefits under the Indian Veterans Housing Opportunity Act of 2010 (only applies to Native American housing programs)~~
- ~~(n) Payments received from programs funded under Title V of the Older Americans Act of 1985 (42 U.S.C. 3056(f))~~
- ~~(o) Payments received on or after January 1, 1989, from the Agent Orange Settlement Fund or any other fund established pursuant to the settlement in *In Re Agent Orange* product liability litigation, M.D.L. No. 381 (E.D.N.Y.)~~
- ~~(p) Payments received under 38 U.S.C. 1833(c) to children of Vietnam veterans born with spinal bifida, children of women Vietnam veterans born with certain birth defects, and children of certain Korean service veterans born with spinal bifida~~
- ~~(q) Payments received under the Maine Indian Claims Settlement Act of 1980 (25 U.S.C. 1721)~~
- ~~(r) The value of any child care provided or arranged (or any amount received as payment for such care or reimbursement for costs incurred for such care) under the Child Care and Development Block Grant Act of 1990 (42 U.S.C. 9858q)~~
- ~~(s) Earned income tax credit (EITC) refund payments received on or after January 1, 1991 (26 U.S.C. 32(j))~~
- ~~(t) Payments by the Indian Claims Commission to the Confederated Tribes and Bands of Yakima Indian Nation or the Apache Tribe of Mescalero Reservation (Pub. L. 95-433)~~
- ~~(u) Amounts of scholarships funded under Title IV of the Higher Education Act of 1965j, including awards under federal work-study programs or under the Bureau of Indian Affairs student assistance programs (20 U.S.C. 1087uu). For Section 8 programs, the exception found in § 237 of Public Law 109-249 applies and requires that the amount of financial assistance in excess of tuition and mandatory fees shall be considered income in accordance with the provisions codified at 24 CFR 5.609(b)(9), except for those persons with disabilities as defined by 42 U.S.C. 1437a(b)(3)(E) (Pub. L. 109-249) (See Section 6 I.L. for exceptions.)~~
- ~~(v) Allowances, earnings and payments to AmeriCorps participants under the National and Community Service Act of 1990 (42 U.S.C. 12637(d))~~

- ~~(w) Any amount of crime victim compensation (under the Victims of Crime Act) received through crime victim assistance (or payment or reimbursement of the cost of such assistance) as determined under the Victims of Crime Act because of the commission of a crime against the applicant under the Victims of Crime Act (42 U.S.C. 10602)~~
- ~~(x) Any amounts in an "individual development account" as provided by the Assets for Independence Act, as amended in 2002~~
- ~~(y) Payments made from the proceeds of Indian tribal trust cases as described in Notice PIH 2013-30, "Exclusion from Income of Payments under Recent Tribal Trust Settlements" (25 U.S.C. 117b(a))~~
- ~~(z) Major disaster and emergency assistance received under the Robert T. Stafford Disaster Relief and Emergency Assistance Act and comparable disaster assistance provided by states, local governments, and disaster assistance organizations~~
- ~~(aa) Distributions from an ABLE account, and actual or imputed interest on the ABLE account balance~~

PART II: ASSETS

6-II.A. OVERVIEW

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 Chapter 3.

Income from assets is always anticipated, irrespective of the income examination type.

PHA Policy

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.

6-II.B. ASSETS DISPOSED OF FOR LESS THAN FAIR MARKET VALUE [24 CFR 5.603(b)(2)]

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.

Minimum Threshold

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].

PHA Policy

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.

Separation or Divorce

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

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

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.

Asset Owned by a Business Entity

~~If a business entity (e.g., limited liability company or limited partnership) owns the asset, then the family's asset is their ownership stake in the business, not some portion of the business's assets. However, if the family holds the assets in their own name (e.g., they own one third of a restaurant) rather than in the name of a business entity, then the percentage value of the asset owned by the family is what is counted toward net family assets (e.g., one third of the value of the restaurant) [Notice PIH 2023-27].~~

Family Declaration

PHA Policy

Families must sign a declaration form at initial certification and each annual recertification identifying all assets that have been disposed of 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

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 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.

- The threshold amount is \$50,000 for 2024, and \$51,600 for 2025.

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)	Recreational car/vehicle not needed for day-to-day transportation for personal or business use (campers, motorhomes, traveling trailers, all-terrain vehicles (ATVs))
Furniture, carpets, linens, kitchenware	Bank accounts or other financial investments (e.g., checking account, savings account, stocks/bonds)
Common appliances	Recreational boat/watercraft
Common electronics (e.g., radio, television, DVD player, gaming system)	Expensive jewelry without religious or cultural value, or which does not hold family significance.
Clothing	Collectibles (e.g., coins/stamps)
Personal effects that are not luxury items (e.g., toys, books)	Equipment/machinery that is not used to generate income for a business.
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)	Items such as gems/precious metals, antique cars, artwork, etc.

PHA Policy

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.

Checking and Savings Accounts [Notice PIH 2023-27]

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 \$50,000 the HUD-published threshold amount, which is adjusted annually and listed in HUD's current year Inflation Adjusted Values tables (\$50,000 for 2024, and \$51,600 for 2025), as adjusted by inflation, 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 ~~\$50,000 the HUD-published threshold amount, as adjusted by inflation~~, 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]

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.

Investment Accounts Such as Stocks, Bonds, Saving Certificates, and Money Market Funds [24 CFR 5.603(b)(1)]

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 ~~\$50,000~~ the HUD-published threshold amount, which is adjusted annually and listed in HUD's Inflation Adjusted Values tables (\$50,000 for 2024, and \$51,600 for 2025), ~~as adjusted by inflation~~, financial investments such as stocks and bonds are considered part of net family assets. In this case, the value of the family's ~~checking and/or savings accounts~~ 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 \$50,000, as adjusted by inflation~~ 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

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.

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 \$50,000 (adjusted annually by HUD). When the combined value of all non-necessary personal property does not exceed \$50,000, as adjusted by inflation, 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.

PHA Policy

In determining the value of non-necessary 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.

Lump-Sum Additions to Net Family Assets [24 CFR 5.609(b)(24(viii); Notice PIH 2023-27]

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 benefits that are received in a lump sum amount or in prospective monthly amounts are also excluded from income.

However, these amounts may count toward 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.

PHA Policy

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 \$1,000 lump sum for lottery winnings, and the family immediately spends the entire amount, the lump sum will not be counted toward net family assets.

Jointly Owned Assets [Notice PIH 2023-27]

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.

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)]

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 following types of trust distributions are excluded from annual income:~~

- ~~• Distributions of the principal or corpus of the trust; and~~
- ~~• Distributions of income from the trust when the distributions are used to pay the costs of health and medical care expenses for a minor.~~

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.

~~Irrevocable trusts not under the control of any member of the family or household are not assets.~~ 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 is not included in~~ 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. ~~If the value of the trust is not considered part of the family's net 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.~~

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 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 (\$50,000 for 2024, and \$51,600 for 2025), 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 isare 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. If this is the case,~~ 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.

~~Revocable trusts under the control of the family or household (e.g., the grantor is a member of the assisted family or household) are considered assets and must be included in net family assets.~~

~~If the value of the trust is considered part of the family's net assets, then distributions from the trust are not considered income to the family. The PHA must count all actual returns (e.g., interest earned) from the trust as income or, if the trust has no actual returns (e.g., if the trust is comprised of farmland that is not in use)~~

~~and the total value of the combined net family assets exceeds \$50,000 (as that amount is updated for inflation), as imputed returns, as applicable.~~

Life Insurance [FR Notice 2/14/23 and Notice PIH 2023-27]

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]

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 ~~the account in which the federal tax refund or refundable tax credits were deposited~~ net family assets. When the subtraction results in a negative number, then ~~the balance of the asset is~~ net family assets are considered \$0.

~~If the tax refund or refundable tax credit is deposited into another excluded asset, such as a retirement account or a Coverdell Education Savings Account, then the deposit will have no effect on the balance of the asset (i.e., there is no need for the PHA to subtract the amount of the deposit from the value of the excluded asset).~~

Asset Exclusions [24 CFR 5.603(b)]

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 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

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 held in an account or other investment that is considered part of net family assets [Notice PIH 2023-27].

Net Family Assets

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.

PHA Policy

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].

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].

Actual Income from Assets

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 \$50,000 (adjusted annually by HUD)**, without taking additional steps to verify the accuracy of the declaration [24 CFR 5.618(b)]. Policies related to verification of assets are found in Chapter 7 of this policy.

- **The threshold amount is \$50,000 for 2024, and \$51,600 for 2025.**

The PHA may not calculate or include any imputed income from assets when net family assets **total \$50,000 or less 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

When net family assets exceed **\$50,000 the HUD-published threshold amount, which is adjusted annually and listed in HUD's Inflation Adjusted Values tables adjusted annually by HUD**, 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, after deducting reasonable costs that would be incurred in disposing of the asset, 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.

PART III: ADJUSTED INCOME

6-III.A. INTRODUCTION

Overview

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) \$480 for each dependent (adjusted annually by HUD, rounded to the next lowest multiple of \$25);
- (2) \$525 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

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.

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].- For annual reexaminations, the PHA will use information for the previous 12-month period.

6-III.B. DEPENDENT DEDUCTION

An allowance of \$480 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

A single deduction of ~~\$525~~ \$400 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 EXPENSES DEDUCTION [24 CFR 5.611(a)(3)(i) and 5.603(b)]~~

6-III.D. HEALTH AND MEDICAL CARE EXPENSES DEDUCTION [24 CFR 5.611(a)(3)(i) and 5.603(b)]

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 counted. 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.”

Medical insurance premiums continue to be eligible health and medical care expenses. Health and medical care expenses may be deducted from annual income only if they are eligible under this definition and not otherwise reimbursed and may only be deducted for elderly or disabled families.

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 with IRS Publication 502 for determining which expenses are included in HUD's mandatory deduction for health and medical care expenses. PHAs must review each expense to determine whether it is eligible in accordance with HUD's definition of *health and medical care expenses*.

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.

PHA Policy

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 <u>not</u> 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) 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.	

Families That Qualify for Both Health and Medical and Disability Assistance Expenses

PHA Policy

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.

6-III.E. DISABILITY ASSISTANCE EXPENSES DEDUCTION [24 CFR 5.603(b) and 24 CFR 5.611(a)(3)(ii)]

Unreimbursed reasonable expenses for attendant care and auxiliary apparatus for each member of the family who is a person with disabilities may be deducted if they: (1) are necessary to enable a family member 18 years or older to work, (2) are not paid to a family member or reimbursed by an outside source, (3) in combination with any medical expenses, exceed ten percent of annual income, and (4) do not exceed the earned income received by the family member who is enabled to work.

Earned Income Limit on the Disability Assistance Expense Deduction

A family can qualify for the disability assistance expense deduction only if at least one family member (who may be the person with disabilities) is enabled to work [24 CFR 5.603(b)].

The disability expense deduction is capped by the amount of “earned income received by family members who are 18 years of age or older and who are able to work” because of the expense [24 CFR 5.611(a)(3)(ii)]. The earned income used for this purpose is the amount verified before any earned income disallowances or income exclusions are applied.

PHA Policy

The family must identify the family members enabled to work as a result of the disability assistance expenses. In evaluating the family’s request, the PHA will consider factors such as how the work schedule of the relevant family members relates to the hours of care provided, the time required for transportation, the relationship of the family members to the person with disabilities, and any special needs of the person with disabilities that might determine which family members are enabled to work.

When the PHA determines that the disability assistance expenses enable more than one family member to work, the expenses will be capped by the sum of the family members’ incomes.

Eligible Auxiliary Apparatus [Notice PIH 2023-27]

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.

Eligible Attendant Care [Notice PIH 2023-27]

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.

PHA Policy

Attendant care expenses will be included for the period that the person enabled to work is employed plus reasonable transportation time. The cost of general housekeeping and personal services is not an eligible attendant care expense. However, if the person enabled to work is the person with disabilities, personal services necessary to enable the person with disabilities to work are eligible.

If the care attendant also provides other services to the family, the PHA will prorate the cost and allow only that portion of the expenses attributable to attendant care that enables a family member to work. For example, if the care provider also cares for a child who is not the person with disabilities, the cost of care must be prorated. Unless otherwise specified by the care provider, the calculation will be based upon the number of hours spent in each activity and/or the number of persons under care.

Payments to Family Members

No disability assistance expenses may be deducted for payments to a member of an assisted family [24 CFR 5.603(b)]. However, expenses paid to a relative who is not a member of the assisted family may be deducted if they are not reimbursed by an outside source.

Necessary and Reasonable Expenses

The family determines the type of care or auxiliary apparatus to be provided and must describe how the expenses enable a family member to work. The family must certify that the disability assistance expenses are necessary and are not paid or reimbursed by any other source.

PHA Policy

The PHA determines the reasonableness of the expenses based on typical costs of care or apparatus in the locality. To establish typical costs, the PHA will collect information from organizations that provide services and support to persons with disabilities. A family may present, and the PHA will consider, the family's justification for costs that exceed typical costs in the area.

Families That Qualify for Both Health and Medical and Disability Assistance Expenses

PHA Policy

This policy applies only to families in which the head or spouse is 62 or older or is a person with disabilities.

When expenses anticipated by a family could be defined as either 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.

6-III.F. CHILD-CARE EXPENSE DEDUCTION

HUD defines *child-care expenses* at 24 CFR 5.603(b) as “amounts anticipated to be paid by the family for the care of children under 13 years of age (age 12 and younger) (including foster children) during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed, or to further his or her education and only to the extent such amounts are not reimbursed. The amount deducted shall reflect reasonable charges for child-care. In the case of child-care necessary to permit employment, the amount deducted shall not exceed the amount of employment income that is included in annual income.”

Clarifying the Meaning of *Child* for This Deduction

Child-care expenses do not include child support payments made to another on behalf of a minor who is not living in an assisted family’s household [VG, p. 26]. However, child-care expenses for foster children that are living in the assisted family’s household are included when determining the family’s child-care expenses [HCV GB, p. 5-29].

Qualifying for the Deduction

Determining Who Is Enabled to Pursue an Eligible Activity

PHA Policy

The family must identify the family member(s) enabled to pursue an eligible activity. The term *eligible activity* in this section means any of the activities that may make the family eligible for a child-care deduction (seeking work, pursuing an education, or being gainfully employed).

In evaluating the family’s request, the PHA will consider factors such as how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.

Seeking Work

PHA Policy

If the child-care expense being claimed is to enable a family member to seek employment, the family must provide evidence of the family member’s efforts to obtain employment at each reexamination. The deduction may be reduced or denied if the family member’s job search efforts are not commensurate with the child-care expense being allowed by the PHA.

Furthering Education

PHA Policy

If the child-care expense being claimed is to enable a family member to further their education, the member must be enrolled in school (academic or vocational) or participating in a formal training program. The family member is not required to be a full-time student, but the time spent in educational activities must be commensurate with the child-care claimed.

Being Gainfully Employed

PHA Policy

If the child-care expense being claimed is to enable a family member to be gainfully employed, the family must provide evidence of the family member's employment during the time that childcare is being provided. Gainful employment is any legal work activity (full- or part-time) for which a family member is compensated.

Earned Income Limit on Child-Care Expense Deduction

When a family member looks for work or furthers their education, there is no cap on the amount that may be deducted for child-care – although the care must still be necessary and reasonable. However, when child-care enables a family member to work, the deduction is capped by “the amount of employment income that is included in annual income” [24 CFR 5.603(b)].

The earned income used for this purpose is the amount of earned income verified after any earned income disallowances or income exclusions are applied.

~~When the person who is enabled to work is a person with disabilities who receives the earned income disallowance (EID) or a full-time student whose earned income above \$480 is excluded, child-care costs related to enabling a family member to work may not exceed the portion of the person's earned income that actually is included in annual income. For example, if a family member who qualifies for the EID makes \$15,000 but because of the EID only \$5,000 is included in annual income, child-care expenses are limited to \$5,000.~~

The PHA must not limit the deduction to the least expensive type of child-care. If the care allows the family to pursue more than one eligible activity, including work, the cap is calculated in proportion to the amount of time spent working [HCV GB, p. 5-30].

PHA Policy

When the child-care expense being claimed is to enable a family member to work, only one family member's income will be considered for a given period of time. When more than one family member works during a given period, the PHA generally will limit allowable child-care expenses to the earned income of the lowest-paid member. The family may provide information that supports a request to designate another family member as the person enabled to work.

Eligible Child-care Expenses

The type of care to be provided is determined by the assisted family. The PHA may not refuse to give a family the child-care expense deduction because there is an adult family member in the household that may be available to provide child-care [VG, p. 26].

Allowable Child-care Activities

PHA Policy

For school-age children, costs attributable to public or private school activities during standard school hours are not considered. Expenses incurred for supervised activities after school or during school holidays (e.g., summer day camp, after-school sports league) are allowable forms of child-care.

The costs of general housekeeping and personal services are not eligible. Likewise, child-care expenses paid to a family member who lives in the family's unit are not eligible; however, payments for child-care to relatives who do not live in the unit are eligible.

If a child-care provider also renders other services to a family or child-care is used to enable a family member to conduct activities that are not eligible for consideration, the PHA will prorate the costs and allow only that portion of the expenses that is attributable to child-care for eligible activities. For example, if the care provider also cares for a child with disabilities who is 13 or older, the cost of care will be prorated. Unless otherwise specified by the child-care provider, the calculation will be based upon the number of hours spent in each activity and/or the number of persons under care.

Necessary and Reasonable Costs

Child-care expenses will be considered necessary if: (1) a family adequately explains how the care enables a family member to work, actively seek employment, or further their education, and (2) the family certifies, and the child-care provider verifies, that the expenses are not paid or reimbursed by any other source.

PHA Policy

Child-care expenses will be considered for the time required for the eligible activity plus reasonable transportation time. For child-care that enables a family member to go to school, the time allowed may include not more than one study hour for each hour spent in class.

To establish the reasonableness of child-care costs, the PHA will use the schedule of childcare costs from a qualified local entity that either subsidizes childcare costs or licenses childcare providers. Families may present, and the PHA will consider, justification for costs that exceed typical costs in the area.

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]

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

The first category is applicable to 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**. The family must receive phased-in relief if they are determined to be eligible. These families will begin receiving a 24-month phased-in relief at their next annual or interim reexamination, whichever occurs first, **after the date on which the PHA implements phased-in relief**.

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 will need to process another transaction one year later to move the family along to the next phase. The transaction can be either an interim reexamination if triggered, or a non-interim reexamination transaction.~~

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.

PHA Policy

The PHA will not continue the phased-in relief for families who move from public housing to HCV. 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.

General Relief

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.

PHA Policy

To qualify for a hardship exemption, a family must submit a request in writing. The request must show that the family's health and medical and/or disability assistance expenses have increased (other than the transition to the higher threshold) and that the family's financial hardship is a result of a change in circumstances. 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 circumstances constituting a financial hardship may include the following situations:

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.

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. The notice must inform the family of when the hardship exemption will begin and expire [24 CFR 5.611(e)(2)].

PHA Policy

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 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

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 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]

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

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 child-care 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 (child-care 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 child-care expense is still necessary even though the family member is no longer employed or 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

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 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.

PHA Policy

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-III.H. PERMISSIVE DEDUCTIONS [24 CFR 5.611(b)(1)(ii)]

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

The PHA has opted not to use permissive deductions.

PART IV: CALCULATING FAMILY SHARE AND PHA SUBSIDY

6-IV.A. OVERVIEW OF RENT AND SUBSIDY CALCULATIONS

TTP Formula [24 CFR 5.628]

HUD regulations specify the formula for calculating the total tenant payment (TTP) for an assisted family. TTP is the highest of the following amounts, rounded to the nearest dollar:

- 30 percent of the family's monthly adjusted income (adjusted income is defined in Part II)
- 10 percent of the family's monthly gross income (annual income, as defined in Part I, divided by 12)
- The welfare rent (in as-paid states only)
- A minimum rent between \$0 and \$50 that is established by the PHA

The PHA has authority to suspend and exempt families from minimum rent when a financial hardship exists, as defined in section 6-IV.B.

The amount that a family pays for rent and utilities (the family share) will never be less than the family's TTP but may be greater than the TTP depending on the rent charged for the unit the family selects.

Welfare Rent [24 CFR 5.628]

PHA Policy

Welfare rent does not apply in this locality.

Minimum Rent [24 CFR 5.630]

PHA Policy

The minimum rent for this locality is \$0.

Family Share [24 CFR 982.305(a)(5)]

If a family chooses a unit with a gross rent (rent to owner plus an allowance for tenant-paid utilities) that exceeds the PHA's applicable payment standard: (1) the family will pay more than the TTP, and (2) at initial occupancy the PHA may not approve the tenancy if it would require the family share to exceed 40 percent of the family's monthly adjusted income. **The income used for this determination must have been verified no earlier than 60 days before the family's voucher was issued.** (For a discussion of the application of payment standards, see section 6-IV.C.)

PHA Subsidy [24 CFR 982.505(b)]

The PHA will pay a monthly housing assistance payment (HAP) for a family that is equal to the lower of (1) the applicable payment standard for the family minus the family's TTP or (2) the gross rent for the family's unit minus the TTP. (For a discussion of the application of payment standards, see section 6-IV.C.)

Utility Reimbursement [24 CFR 982.514(b); 982.514(c)]

When the PHA subsidy for a family exceeds the rent to owner, the family is due a utility reimbursement. HUD permits the PHA to pay the reimbursement to the family or directly to the utility provider.

PHA Policy

The PHA will make utility reimbursements to the family.

The PHA may make all utility reimbursement payments to qualifying families on a monthly basis or may make quarterly payments when the monthly reimbursement amount is \$15.00 or less. Reimbursements must be made once per calendar-year quarter and must be prorated if the family leaves the program in advance of its next quarterly reimbursement. The PHA must also adopt hardship policies for families for whom receiving quarterly reimbursement would create a financial hardship.

PHA Policy

The PHA will issue all utility reimbursements monthly.

6-IV.B. FINANCIAL HARDSHIPS AFFECTING MINIMUM RENT [24 CFR 5.630]

PHA Policy

The financial hardship rules described below do not apply in this jurisdiction because the PHA has established a minimum rent of \$0.

Overview

If the PHA establishes a minimum rent greater than zero, the PHA must grant an exemption from the minimum rent if a family is unable to pay the minimum rent because of financial hardship.

The financial hardship exemption applies only to families required to pay the minimum rent. If a family's TTP is higher than the minimum rent, the family is not eligible for a hardship exemption. If the PHA determines that a hardship exists, the family share is the highest of the remaining components of the family's calculated TTP.

HUD-Defined Financial Hardship

Financial hardship includes the following situations:

(1) The family has lost eligibility for or is awaiting an eligibility determination for a federal, state, or local assistance program. This includes a family member who is a noncitizen lawfully admitted for permanent residence under the Immigration and Nationality Act who would be entitled to public benefits but for Title IV of the Personal Responsibility and Work Opportunity Act of 1996.

PHA Policy

A hardship will be considered to exist only if the loss of eligibility has an impact on the family's ability to pay the minimum rent.

For a family waiting for a determination of eligibility, the hardship period will end as of the first of the month following: (1) implementation of assistance, if approved, or (2) the decision to deny assistance. A family whose request for assistance is denied may request a hardship exemption based upon one of the other allowable hardship circumstances.

(2) The family would be evicted because it is unable to pay the minimum rent.

PHA Policy

For a family to qualify under this provision, the cause of the potential eviction must be the family's failure to pay rent to the owner or tenant-paid utilities.

(3) Family income has decreased because of changed family circumstances, including the loss of employment.

(4) A death has occurred in the family.

PHA Policy

In order to qualify under this provision, a family must describe how the death has created a financial hardship (e.g., because of funeral-related expenses or the loss of the family member's income).

(5) The family has experienced other circumstances determined by the PHA.

PHA Policy

The PHA has not established any additional hardship criteria.

Implementation of Hardship Exemption

Determination of Hardship

When a family requests a financial hardship exemption, the PHA must suspend the minimum rent requirement beginning the first of the month following the family's request.

The PHA then determines whether the financial hardship exists and whether the hardship is temporary or long-term.

PHA Policy

The PHA defines temporary hardship as a hardship expected to last 90 days or less. Long-term hardship is defined as a hardship expected to last more than 90 days.

When the minimum rent is suspended, the family share reverts to the highest of the remaining components of the calculated TTP. The example below demonstrates the effect of the minimum rent exemption.

Example: Impact of Minimum Rent Exemption			
Assume the PHA has established a minimum rent of \$50.			
Family Share – No Hardship		Family Share – With Hardship	
\$0	30% of monthly adjusted income	\$0	30% of monthly adjusted income
\$15	10% of monthly gross income	\$15	10% of monthly gross income
N/A	Welfare rent	N/A	Welfare rent
\$50	Minimum rent	\$50	Minimum rent
Minimum rent applies.		Hardship exemption granted.	
TTP = \$50		TTP = \$15	

PHA Policy

To qualify for a hardship exemption, a family must submit a request for a hardship exemption in writing. The request must explain the nature of the hardship and how the hardship has affected the family's ability to pay the minimum rent.

The PHA will make the determination of hardship within 30 calendar days.

No Financial Hardship

If the PHA determines there is no financial hardship, the PHA will reinstate the minimum rent and require the family to repay the amounts suspended.

PHA Policy

The PHA will require the family to repay the suspended amount within 30 calendar days of the PHA's notice that a hardship exemption has not been granted.

Temporary Hardship

If the PHA determines that a qualifying financial hardship is temporary, the PHA must suspend the minimum rent for the 90-day period beginning the first of the month following the date of the family's request for a hardship exemption.

At the end of the 90-day suspension period, the family must resume payment of the minimum rent and must repay the PHA the amounts suspended. HUD requires the PHA to offer a reasonable repayment agreement, on terms and conditions established by the PHA. The PHA also may determine that circumstances have changed and the hardship is now a long-term hardship.

PHA Policy

The PHA will enter into a repayment agreement in accordance with the procedures found in Chapter 16 of this plan.

Long-Term Hardship

If the PHA determines that the financial hardship is long-term, the PHA must exempt the family from the minimum rent requirement for so long as the hardship continues. The exemption will apply from the first of the month following the family's request until the end of the qualifying hardship. When the financial hardship has been determined to be long-term, the family is not required to repay the minimum rent.

PHA Policy

The hardship period ends when any of the following circumstances apply:

- (1) At an interim or annual reexamination, the family's calculated TTP is greater than the minimum rent.
- (2) For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost. For example, if a hardship is approved because a family no longer receives a \$60/month child support payment, the hardship will continue to exist until the family receives at least \$60/month in income from another source or once again begins to receive the child support.
- (3) For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred.

6-IV.C. APPLYING PAYMENT STANDARDS [24 CFR 982.505(c) and Notice PIH 2024-34; 982.503(b)]

Overview

The PHA's schedule of payment standards is used to calculate housing assistance payments for HCV families. This section covers the application of the PHA's payment standards. The establishment and revision of the PHA's payment standard schedule are covered in Chapter 16.

Payment standard is defined as "the maximum monthly assistance payment for a family assisted in the voucher program (before deducting the total tenant payment by the family)" [24 CFR 982.4(b)].

The payment standard for a family is the lower of (1) the payment standard for the family unit size, which is defined as the appropriate number of bedrooms for the family under the PHA's subsidy standards [24 CFR 982.4(b)], or (2) the payment standard for the size of the dwelling unit rented by the family [24 CFR 982.505(c)(1)].

If the PHA has established an exception payment standard for a designated part of a zip code area or an FMR area in accordance with 24 CFR 982.503 and a family's unit is located in the exception designated area, the PHA must use the appropriate payment standard for the exception area [24 CFR 982.505(c)(2)].

The PHA is required to pay a monthly housing assistance payment (HAP) for a family that is the lower of (1) the payment standard for the family minus the family's TTP or (2) the gross rent for the family's unit minus the TTP.

If during the term of the HAP contract for a family's unit, the owner lowers the rent, the PHA will recalculate the HAP using the lower of the initial payment standard or the gross rent for the unit [HCV GB, p. 7-8].

Changes in Payment Standards

When the PHA revises its payment standards during the term of the HAP contract for a family's unit, it will apply the new payment standards in accordance with HUD regulations. **Regulations governing increases and decreases in the payment standard have changed, with a required compliance date of December 3, 2024.**

***Decreases* [24 CFR 982.505(c)(3) and Notice PIH 2024-34]**

For new HAP contracts, the PHA applies the payment standard in effect at the time of HAP contract execution.

The PHA must administer decreases in the payment standard amount for the family in accordance with the PHA policy as described in the administrative plan and apply the policy consistently to all families.

If a PHA changes its payment standard schedule, resulting in a lower payment standard amount, during the term of a HAP contract, the PHA is not required to reduce the payment standard used to calculate subsidy for families under HAP contract as long as the HAP contract remains in effect ~~[FR Notice 11/16/16]~~. The PHA must administer decreases in the payment standard amount for the family in accordance with the PHA policy as described in the administrative plan.

Changes effective 12/2/24 and earlier: However, 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 the effective date of the family's second regular reexamination following the effective date of the decrease in the payment standard amount.

Changes effective 12/3/24 and later: 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).

At that point, the PHA may either reduce the payment standard to the current amount in effect on the PHA's payment standard schedule, or may reduce the payment standard to another amount that is higher than the normally applicable amount on the schedule. The PHA may also establish different policies for designated areas within their jurisdiction (e.g., different zip code areas).

In any case, the PHA must provide the family with at least 12 months' notice that the payment standard is being reduced before the effective date of the change. **In the written notice, the PHA must state 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.** The PHA's policy on decreases in the payment standard during the term of the HAP contract apply to all families under HAP contract at the time of the effective date of the decrease in the payment standard within the designated area.

PHA Policy

If a PHA changes its payment standard schedule resulting in a lower payment standard amount, during the term of a HAP contract, the PHA will not reduce the payment standard used to calculate subsidy for families under HAP contract as long as the HAP contract remains in effect.

The PHA will not establish different policies for decreases in the payment standard for designated areas within their jurisdiction.

Increases [24 CFR 982.505(c)(4) and Notice PIH 2024-34]

For new HAP contracts, the PHA applies the payment standard in effect at the time of HAP contract execution.

Changes effective 12/2/24 and earlier: If the payment standard is increased during the term of the HAP contract, the increased payment standard will be used to calculate the monthly housing assistance payment for the family beginning on the effective date of the family's first regular reexamination on or after the effective date of the increase in the payment standard.

Families requiring or requesting interim reexaminations will not have their HAP payments calculated using the higher payment standard until their next annual reexamination [HCV GB, p. 7-8].

Changes effective 12/3/24 and later: If the payment standard is increased during the term of the HAP contract, the increased payment standard will be applied no later than the earliest of:

- The effective date of an increase in the gross rent that would result in an increase in the family share;
- The family's first regular or interim reexamination; or
- One year following the effective date of the increase in the payment standard amount.

The PHA may adopt a policy to apply a payment standard increase at any time earlier than the date calculated above as long as the policy is included in the administrative plan and applied consistently to all families [24 CFR 982.505(c)(5)].

PHA Policy

The PHA will not adopt payment standard increases earlier than the date required by the regulations.

Changes in Family Unit Size (Voucher Size) [24 CFR 982.505(c)(6) and Notice PIH 2024-34]

Changes effective 12/2/24 and earlier: Irrespective of any increase or decrease in the payment standard, if the family unit size increases or decreases during the HAP contract term, the new family unit size must be used to determine the payment standard for the family beginning at the family's first regular reexamination following the change in family unit size.

Changes effective 12/3/24 and later: Irrespective of any increase or decrease in the payment standard, if the family unit size increases or decreases during the HAP contract term, the new family unit size may be used to determine the payment standard immediately but no later than 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.

Moves

If the family moves to a new unit, or a new HAP contract is executed due to changes in the lease (even if the family remains in place) the current payment standard applicable to the family will be used when the new HAP contract is processed.

Reasonable Accommodation [24 CFR 982.503(d)(5)]

If a family requires a higher payment standard as a reasonable accommodation for a family member who is a person with disabilities, the PHA is allowed to establish a higher payment standard for the family of not more than 120 percent of the published FMR **without HUD approval or prior notification to HUD**. A PHA may establish a payment standard greater than 120 percent of the applicable FMR as a reasonable accommodation in accordance with 24 CFR part 8, after requesting and receiving HUD approval. See Chapter 16 for more information.

6-IV.D. APPLYING UTILITY ALLOWANCES [24 CFR 982.517]

Overview

A PHA-established utility allowance schedule is used in determining family share and PHA subsidy. A family's utility allowance is determined by the size of dwelling unit leased by a family or the voucher unit size for which the family qualifies using PHA subsidy standards, whichever is the lowest of the two. See Chapter 5 for information on the PHA's subsidy standards.

For policies on establishing and updating utility allowances, see Chapter 16.

Flat Fees [24 CFR 982.517(b)(2)(iii)]

The PHA may base its utility allowance payments on actual flat fees charged by an owner for utilities that are billed directly by the owner, but only if the flat fee charged by the owner is no greater than the PHA's applicable utility allowance for the utilities covered by the fee. If the owner charges a flat fee for some but not all utilities, the PHA must pay a separate allowance for any tenant-paid utilities not covered in the flat fee.

PHA Policy

The PHA will not base utility allowance payments on flat fees charged by the owner.

PBV Developments [24 CFR 982.517(b)(2)(iv)]

If a tenant-based voucher holder resides in a project with project-based voucher (PBV) units and the PBV units use a site-specific utility allowance in accordance with PBV regulations, the PHA must use the project-specific utility allowance schedule.

Reasonable Accommodation and Individual Relief

On request from a family that includes a person with disabilities, the PHA must approve a utility allowance which is higher than the applicable amount on the utility allowance schedule if a higher utility allowance is needed as a reasonable accommodation to make the program accessible and usable by the family member with a disability [24 CFR 982.517(e)]. (See Chapter 2 for policies regarding the request and approval of reasonable accommodations.)

Further, the PHA may grant requests for individual relief from charges in excess of the utility allowance on reasonable grounds, such as special factors not within control of the resident, as the PHA deems appropriate. The family must request the higher allowance and provide the PHA an explanation of the need for individual relief and an explanation about the amount of additional allowance required [see HCV GB, p. 18-8].

PHAs should develop criteria for granting individual relief, notify residents about the availability of individual relief, and notify participants about the availability of individual relief programs (sometimes referred to as "Medical Baseline discounts") offered by the local utility company.

PHA Policy

The family must request the higher allowance and provide the PHA with information about the amount of additional allowance required.

The PHA will consider the following criteria as valid reasons for granting individual relief:

The family's consumption was mistakenly portrayed as excessive due to defects in the meter or errors in the meter reading.

The excessive consumption is caused by a characteristic of the unit or owner-supplied equipment that is beyond the family's control, such as a particularly inefficient refrigerator or inadequate insulation. The allowance should be adjusted to reflect the higher consumption needs associated with the unit until the situation is remedied. The resident should be granted individual relief until the allowance is adjusted.

The excessive consumption is due to special needs of the family that are beyond their control, such as the need for specialized equipment in the case of a family member who is ill, elderly, or who has a disability.

In determining the amount of the reasonable accommodation or individual relief, the PHA will allow a reasonable measure of additional usage as necessary. To arrive at the amount of additional utility cost of specific equipment, the family may provide information from the manufacturer of the equipment, or the family or PHA may conduct an internet search for an estimate of usage or additional monthly cost.

Information on reasonable accommodation and individual relief for charges in excess of the utility allowance will be provided to all families at admission as part of the information on payment standards and utility allowances in the briefing packet. The PHA will also provide information on utility relief programs or medical discounts (sometimes referred to as "Medical Baseline discounts") that may be available through local utility providers.

At its discretion, the PHA may reevaluate the need for the increased utility allowance at any regular reexamination.

If the excessive consumption is caused by a characteristic of the unit or PHA-supplied equipment that is beyond the family's control, such as a particularly inefficient refrigerator or inadequate insulation, the individual relief to the resident will cease when the situation is remedied.

Utility Allowance Revisions

At reexamination, the PHA must use the current utility allowance schedule [HCV GB, p. 18-8].

PHA Policy

Revised utility allowances will be applied to a family's rent and subsidy calculations at the first annual reexamination that is effective after the allowance is adopted.

6-IV.E. PRORATED ASSISTANCE FOR MIXED FAMILIES [24 CFR 5.520]

HUD regulations prohibit assistance to ineligible family members. A *mixed family* is one that includes at least one U.S. citizen or eligible immigrant and any number of ineligible family members. The PHA must prorate the assistance provided to a mixed family. The PHA will first determine assistance as if all family members were eligible and then prorate the assistance based upon the percentage of family members that actually are eligible. For example, if the PHA subsidy for a family is calculated at \$500 and two of four family members are ineligible, the PHA subsidy would be reduced to \$250.

EXHIBIT 6-1: ANNUAL INCOME FULL DEFINITION

24 CFR 5.609

(a) Annual income includes, with respect to the family:

(1) All amounts, not specifically excluded in paragraph (b) of this section, received from all sources by each member of the family who is 18 years of age or older or is the head of household or spouse of the head of household, plus unearned income by or on behalf of each dependent who is under 18 years of age, and

(2) When the value of net family assets exceeds \$50,000 the HUD-published threshold amount (which amount HUD will adjust annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers) and the actual returns from a given asset cannot be calculated, imputed returns on the asset based on the current passbook savings rate, as determined by HUD.

(b) Annual income does not include the following:

(1) Any imputed return on an asset when net family assets total \$50,000 or less are less than or equal to the HUD-published threshold amount (which amount HUD will adjust annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers) and no actual income from the net family assets can be determined.

(2) The following types of trust distributions:

(i) For an irrevocable trust or a revocable trust outside the control of the family or household excluded from the definition of net family assets under § 5.603(b):

(A) Distributions of the principal or corpus of the trust; and

(B) Distributions of income from the trust when the distributions are used to pay the costs of health and medical care expenses for a minor.

(ii) For a revocable trust under the control of the family or household, any distributions from the trust; except that any actual income earned by the trust, regardless of whether it is distributed, shall be considered income to the family at the time it is received by the trust.

(3) Earned income of children under the 18 years of age.

(4) Payments received for the care of foster children or foster adults, or State or Tribal kinship or guardianship care payments.

(5) Insurance payments and settlements for personal or property losses, including but not limited to payments through health insurance, motor vehicle insurance, and workers' compensation.

(6) Amounts received by the family that are specifically for, or in reimbursement of, the cost of health and medical care expenses for any family member.

(7) 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 member of the family becoming disabled.

(8) Income of a live-in aide, foster child, or foster adult as defined in §§ 5.403 and 5.603, respectively.

(9)

(i) Any assistance that section 479B of the Higher Education Act of 1965, as amended (20 U.S.C. 1087uu), requires be excluded from a family's income; and

(ii) Student financial assistance for tuition, books, and supplies (including supplies and equipment to support students with learning disabilities or other disabilities), room and board, and other fees required and charged to a student by an institution of higher education (as defined under Section 102 of the Higher Education Act of 1965 (20 U.S.C. 1002)) and, for a student who is not the head of household or spouse, the reasonable and actual costs of housing while attending the institution of higher education and not residing in an assisted unit.

(A) Student financial assistance, for purposes of this paragraph (9)(ii), means a grant or scholarship received from— (

- 1) The Federal government;
- (2) A State, Tribe, or local government;
- (3) A private foundation registered as a nonprofit under 26 U.S.C. 501(c)(3);
- (4) A business entity (such as corporation, general partnership, limited liability company, limited partnership, joint venture, business trust, public benefit corporation, or nonprofit entity); or
- (5) An institution of higher education.

(B) Student financial assistance, for purposes of this paragraph (9)(ii), does not include—

- (1) Any assistance that is excluded pursuant to paragraph (b)(9)(i) of this section;
- (2) Financial support provided to the student in the form of a fee for services performed (e.g., a work study or teaching fellowship that is not excluded pursuant to paragraph (b)(9)(i) of this section); (
- 3) Gifts, including gifts from family or friends; or

(4) Any amount of the scholarship or grant that, either by itself or in combination with assistance excluded under this paragraph or paragraph (b)(9)(i), exceeds the actual covered costs of the student. The actual covered costs of the student are the actual costs of tuition, books and supplies (including supplies and equipment to support students with learning disabilities or other disabilities), room and board, or other fees required and charged to a student by the education institution, and, for a student who is not the head of household or spouse, the reasonable and actual costs of housing while attending the institution of higher education and not residing in an assisted unit. This calculation is described further in paragraph (b)(9)(ii) of this section.

(C) Student financial assistance, for purposes of this paragraph (b)(9)(ii) must be:

- (1) Expressly for tuition, books, room and board, or other fees required and charged to a student by the education institution;
- (2) Expressly to assist a student with the costs of higher education; or
- (3) Expressly to assist a student who is not the head of household or spouse with the reasonable and actual costs of housing while attending the education institution and not residing in an assisted unit.

(D) Student financial assistance, for purposes of this paragraph (b)(9)(ii), may be paid directly to the student or to the educational institution on the student's behalf. Student financial assistance paid to the student must be verified by the responsible entity as student financial assistance consistent with this paragraph (b)(9)(ii).

(E) When the student is also receiving assistance excluded under paragraph (b)(9)(i) of this section, the amount of student financial assistance under this paragraph (b)(9)(ii) is determined as follows:

(1) If the amount of assistance excluded under paragraph (b)(9)(i) of this section is equal to or exceeds the actual covered costs under paragraph (b)(9)(ii)(B)(4) of this section, none of the assistance described in this paragraph (b)(9)(ii) of this section is considered student financial assistance excluded from income under this paragraph (b)(9)(ii)(E).

(2) If the amount of assistance excluded under paragraph (b)(9)(i) of this section is less than the actual covered costs under paragraph (b)(9)(ii)(B)(4) of this section, the amount of assistance described in paragraph (b)(9)(ii) of this section that is considered student financial assistance excluded under this paragraph is the lower of:

(i) the total amount of student financial assistance received under this paragraph (b)(9)(ii) of this section, or

(ii) the amount by which the actual covered costs under paragraph (b)(9)(ii)(B)(4) of this section exceeds the assistance excluded under paragraph (b)(9)(i) of this section.

(10) Income and distributions from any Coverdell education savings account under section 530 of the Internal Revenue Code of 1986 or any qualified tuition program under section 529 of such Code; and income earned by government contributions to, and distributions from, “baby bond” accounts created, authorized, or funded by Federal, State, or local government.

(11) The special pay to a family member serving in the Armed Forces who is exposed to hostile fire.

(12)

(i) Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS);

(ii) Amounts received by a participant in other publicly assisted programs which are specifically for or in reimbursement of out-of-pocket expenses incurred (e.g., special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program;

(iii) Amounts received under a resident service stipend not to exceed \$200 per month. A resident service stipend is a modest amount received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development.

(iv) Incremental earnings and benefits resulting to any family member from participation in training programs funded by HUD or in qualifying Federal, State, Tribal, or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the employment training program unless those amounts are excluded under paragraph (b)(9)(i) of this section.

(13) Reparation payments paid by a foreign government pursuant to claims filed under the laws of that government by persons who were persecuted during the Nazi era.

(14) Earned income of dependent fulltime students in excess of the amount of the deduction for a dependent in § 5.611.

(15) Adoption assistance payments for a child in excess of the amount of the deduction for a dependent in § 5.611.

(16) Deferred periodic amounts from Supplemental Security Income 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 benefits that are received in a lump sum amount or in prospective monthly amounts.

(17) Payments related to aid and attendance under 38 U.S.C. 1521 to veterans in need of regular aid and attendance.

(18) Amounts received by the family in the form of refunds or rebates under State or local law for property taxes paid on the dwelling unit.

(19) Payments made by or authorized by a State Medicaid agency (including through a managed care entity) or other State or Federal agency to a family to enable a family member who has a disability to reside in the family's assisted unit. Authorized payments may include payments to a member of the assisted family through the State Medicaid agency (including through a managed care entity) or other State or Federal agency for caregiving services the family member provides to enable a family member who has a disability to reside in the family's assisted unit.

(20) Loan proceeds (the net amount disbursed by a lender to or on behalf of a borrower, under the terms of a loan agreement) received by the family or a third party (e.g., proceeds received by the family from a private loan to enable attendance at an educational institution or to finance the purchase of a car).

(21) Payments received by Tribal members as a result of claims relating to the mismanagement of assets held in trust by the United States, to the extent such payments are also excluded from gross income under the Internal Revenue Code or other Federal law.

(22) Amounts that HUD is required by Federal statute to exclude from consideration as income for purposes of determining eligibility or benefits under a category of assistance programs that includes assistance under any program to which the exclusions set forth in paragraph (b) of this section apply. HUD will publish a notice in the Federal Register to identify the benefits that qualify for this exclusion. Updates will be published when necessary.

(23) Replacement housing "gap" payments made in accordance with 49 CFR part 24 that offset increased out of pocket costs of displaced persons that move from one federally subsidized housing unit to another Federally subsidized housing unit. Such replacement housing "gap" payments are not excluded from annual income if the increased cost of rent and utilities is subsequently reduced or eliminated, and the displaced person retains or continues to receive the replacement housing "gap" payments.

(24) Nonrecurring income, which is income that will not be repeated in the coming year based on information provided by the family. Income received as an independent contractor, day laborer, or seasonal worker is not excluded from income under this paragraph, even if the source, date, or amount of the income varies. Nonrecurring income includes:

(i) Payments from the U.S. Census Bureau for employment (relating to decennial census or the American Community Survey) lasting no longer than 180 days and not culminating in permanent employment.

(ii) Direct Federal or State payments intended for economic stimulus or recovery.

(iii) Amounts directly received by the family as a result of State refundable tax credits or State tax refunds at the time they are received.

(iv) Amounts directly received by the family as a result of Federal refundable tax credits and Federal tax refunds at the time they are received.

(v) Gifts for holidays, birthdays, or other significant life events or milestones (e.g., wedding gifts, baby showers, anniversaries).

(vi) Non-monetary, in-kind donations, such as food, clothing, or toiletries, received from a food bank or similar organization.

(vii) Lump-sum additions to net family assets, including but not limited to lottery or other contest winnings.

(25) Civil rights settlements or judgments, including settlements or judgments for back pay.

(26) Income received from any account under a retirement plan recognized as such by the Internal Revenue Service, including individual retirement arrangements (IRAs), employer retirement plans, and retirement plans for self-employed individuals; except that any distribution of periodic payments from such

accounts shall be income at the time they are received by the family.

(27) Income earned on amounts placed in a family's Family Self Sufficiency Account.

(28) Gross income a family member receives through self-employment or operation of a business; except that the following shall be considered income to a family member:

(i) Net income from the operation of a business or profession. Expenditures for business expansion or amortization of capital indebtedness shall not be used as deductions in determining net income. An allowance for depreciation of assets used in a business or profession may be deducted, based on straight line depreciation, as provided in Internal Revenue Service regulations; and

(ii) Any withdrawal of cash or assets from the operation of a business or profession will be included in income, except to the extent the withdrawal is reimbursement of cash or assets invested in the operation by the family.

EXHIBIT 6-2: TREATMENT OF FAMILY ASSETS

24 CFR 5.603(b) Net Family Assets

(1) Net family assets is 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.

(2) 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.

(3) Excluded from the calculation of net family assets are: (i) The value of necessary items of personal property; (ii) The combined value of all non-necessary items of personal property if the combined total value does not exceed ~~\$50,000~~ **the HUD-published threshold amount** (which amount will be adjusted by HUD in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers); (iii) The value of any account under a retirement plan recognized as such by the Internal Revenue Service, including individual retirement

arrangements (IRAs), employer retirement plans, and retirement plans for self-employed individuals; (iv) 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; (v) 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; (vi) The value of any Coverdell education savings account under section 530 of the Internal Revenue Code of 1986, the value of any qualified tuition program under section 529 of such Code, the value of any Achieving a Better Life Experience (ABLE) account authorized under Section 529A of such Code, and the value of any “baby bond” account created, authorized, or funded by Federal, State, or local government. (vii) Interests in Indian trust land; (viii) Equity in a manufactured home where the family receives assistance under 24 CFR part 982; (ix) Equity in property under the Homeownership Option for which a family receives assistance under 24 CFR part 982; (x) Family Self-Sufficiency Accounts; and (xi) Federal tax refunds or refundable tax credits for a period of 12 months after receipt by the family.

(4) In cases where a trust fund has been established and the trust is not revocable by, or under the control of, any member of the family or household, the trust fund is not a family asset and the value of the trust is not included in the calculation of 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.

EXHIBIT 6-3: THE EFFECT OF WELFARE BENEFIT REDUCTION

24 CFR 5.615

Public housing program and Section 8 tenant-based assistance program: How welfare benefit reduction affects family income.

(a) Applicability. This section applies to covered families who reside in public housing (part 960 of this title) or receive Section 8 tenant-based assistance (part 982 of this title).

(b) Definitions. The following definitions apply for purposes of this section:

Covered families. Families who receive welfare assistance or other public assistance benefits (“welfare benefits”) from a State or other public agency (“welfare agency”) under a program for which Federal, State, or local law requires that a member of the family must participate in an economic self-sufficiency program as a condition for such assistance.

Economic self-sufficiency program. See definition at Sec. 5.603.

Imputed welfare income. The amount of annual income not actually received by a family, as a result of a specified welfare benefit reduction, that is nonetheless included in the family's annual income for purposes of determining rent.

Specified welfare benefit reduction.

(1) A reduction of welfare benefits by the welfare agency, in whole or in part, for a family member, as determined by the welfare agency, because of fraud by a family member in connection with the welfare program; or because of welfare agency sanction against a family member for noncompliance with a welfare agency requirement to participate in an economic self-sufficiency program.

(2) “Specified welfare benefit reduction” does not include a reduction or termination of welfare benefits by the welfare agency:

(i) at expiration of a lifetime or other time limit on the payment of welfare benefits;

(ii) because a family member is not able to obtain employment, even though the family member has complied with welfare agency economic self-sufficiency or work activities requirements; or

(iii) because a family member has not complied with other welfare agency requirements.

(c) Imputed welfare income.

(1) A family's annual income includes the amount of imputed welfare income (because of a specified welfare benefits reduction, as specified in notice to the PHA by the welfare agency), plus the total amount of other annual income as determined in accordance with Sec. 5.609.

(2) At the request of the PHA, the welfare agency will inform the PHA in writing of the amount and term of any specified welfare benefit reduction for a family member, and the reason for such reduction, and will also inform the PHA of any subsequent changes in the term or amount of such specified welfare benefit reduction. The PHA will use this information to determine the amount of imputed welfare income for a family.

(3) A family's annual income includes imputed welfare income in family annual income, as determined at the PHA's interim or regular reexamination of family income and composition, during the term of the welfare benefits reduction (as specified in information provided to the PHA by the welfare agency).

(4) The amount of the imputed welfare income is offset by the amount of additional income a family receives that commences after the time the sanction was imposed. When such

additional income from other sources is at least equal to the imputed.

(5) The PHA may not include imputed welfare income in annual income if the family was not an assisted resident at the time of sanction.

(d) Review of PHA decision.

(1) Public housing. If a public housing tenant claims that the PHA has not correctly calculated the amount of imputed welfare income in accordance with HUD requirements, and if the PHA denies the family's request to modify such amount, the PHA shall give the tenant written notice of such denial, with a brief explanation of the basis for the PHA determination of the amount of imputed welfare income. The PHA notice shall also state that if the tenant does not agree with the PHA determination, the tenant may request a grievance hearing in accordance with part 966, subpart B of this title to review the PHA determination. The tenant is not required to pay an escrow deposit pursuant to Sec. 966.55(e) for the portion of tenant rent attributable to the imputed welfare income in order to obtain a grievance hearing on the PHA determination.

(2) Section 8 participant. A participant in the Section 8 tenant-based assistance program may request an informal hearing, in accordance with Sec. 982.555 of this title, to review the PHA determination of the amount of imputed welfare income that must be included in the family's annual income in accordance with this section. If the family claims that such amount is not correctly calculated in accordance with HUD requirements, and if the PHA denies the family's request to modify such amount, the PHA shall give the family written notice of such denial, with a brief explanation of the basis for the PHA determination of the amount of imputed welfare income. Such notice shall also state that if the family does not agree with the PHA determination, the family may request an informal hearing on the

determination under the PHA hearing procedure.

(e) PHA relation with welfare agency.

(1) The PHA must ask welfare agencies to inform the PHA of any specified welfare benefits reduction for a family member, the reason for such reduction, the term of any such reduction, and any subsequent welfare agency determination affecting the amount or term of a specified welfare benefits reduction. If the welfare agency determines a specified welfare benefits reduction for a family member, and gives the PHA written notice of such reduction, the family's annual incomes shall include the imputed welfare income because of the specified welfare benefits reduction.

(2) The PHA is responsible for determining the amount of imputed welfare income that is included in the family's annual income as a result of a specified welfare benefits reduction as determined by the welfare agency, and specified in the notice by the welfare agency to the PHA. However, the PHA is not responsible for determining whether a reduction of welfare benefits by the welfare agency was correctly determined by the welfare agency in accordance with welfare program requirements and procedures, nor for providing the opportunity for review or hearing on such welfare agency determinations.

(3) Such welfare agency determinations are the responsibility of the welfare agency, and the family may seek appeal of such determinations through the welfare agency's normal due process procedures. The PHA shall be entitled to rely on the welfare agency notice to the PHA of the welfare agency's determination of a specified welfare benefits reduction.

Chapter 7.A.

VERIFICATION

[24 CFR 982.516, 24 CFR 982.551, 24 CFR 5.230, Notice PIH 2018-18]

INTRODUCTION

Prior to the PHA's HOTMA compliance date, the PHA will follow policies as outlined in this chapter. -Upon the PHA's HOTMA compliance date, the PHA will follow policies as outlined in Chapter 7.B.

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

The PHA must verify all information that is used to establish the family's eligibility and level of assistance and is required to obtain written authorization from the family in order to collect the information. Applicants and program participants must cooperate with the verification process as a condition of receiving assistance. The PHA must not pass on the cost of verification to the family.

The PHA will follow the verification guidance provided by HUD in Notice PIH 2018-18 and any subsequent guidance issued by HUD. This chapter summarizes those requirements and provides supplementary PHA policies.

Part I describes the general verification process. Part II provides more detailed requirements related to family information. Part III provides information on income and assets, and Part IV covers mandatory deductions.

Verification policies, rules and procedures will be modified as needed to accommodate persons with disabilities. All information obtained through the verification process will be handled in accordance with the records management policies of the PHA.

PART I: GENERAL VERIFICATION REQUIREMENTS

7-I.A. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 982.516 AND 982.551, 24 CFR 5.230]

Consent Forms

The family must supply any information that the PHA or HUD determines is necessary to the administration of the program and must consent to PHA verification of that information [24 CFR 982.551]. All adult family members must sign consent forms as needed to collect information relevant to the family's eligibility and level of assistance. While PHAs must use form HUD-9886-A, this form does not release all the information necessary to the administration of the program. The PHA must also develop its own release forms to cover all other necessary information.

Form HUD-9886-A [24 CFR 5.230(b)(1), b(2), (c)(4), and (c)(5); and Notice PIH 2023-27]

All adult applicants and participants sign form HUD-9886-A, Authorization for Release of Information. All adult family members (and the head and spouse/cohead, regardless of age) are required to sign the Form HUD-9886-A at admission. Participants, prior to January 1, 2024, signed and submitted Form HUD-9886 at each annual reexamination. HOTMA eliminated this requirement and instead required that the Form HUD-9886-A be signed only once. On or after January 1, 2024 (regardless of the PHA's HOTMA compliance date), current program participants must sign and submit a new Form HUD-9886-A at their next interim or annual reexamination. This form will only be signed once. Another Form HUD-9886-A will not be submitted to the PHA except under the following circumstances:

- When any person 18 years or older becomes a member of the family;
- When a current member of the family turns 18; or
- As required by HUD or the PHA in administrative instructions.

The PHA has the discretion to establish policies around when family members must sign consent forms when they turn 18. PHAs must establish these policies stating when family members will be required to sign consent forms at intervals other than at reexamination.

OHA Policy

Family members turning 18 years of age between annual recertifications will be notified in writing that they are required to sign the required Consent to the Release of Information Form HUD-9886-A at the family's next annual or interim reexamination, whichever is earlier.

The purpose of form HUD-9886-A is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form. HUD and the PHA may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members. Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA).

The PHA may obtain any financial record from any financial institution, as the terms financial record and financial institution are defined in the Right to Financial Privacy Act (12 U.S.C. 3401), whenever the PHA determines, the record is needed to determine an applicant's or participants eligibility for assistance or level of benefits [24 CFR 5.230(c)(4)].

The executed form will remain effective until the family is denied assistance, assistance is terminated, or the family provides written notification to the PHA to revoke consent.

~~It is required that all adult applicants and participants sign form HUD-9886, Authorization for Release of Information. The purpose of form HUD-9886 is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form. HUD and OHA may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members. Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA). Adult family members must sign other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. Family members turning 18 years of age between annual recertifications will be notified in writing that they are required to sign the required Consent to the Release of Information Form HUD-9886 at the family's next annual or interim reexamination, whichever is earlier.~~

Penalties for Failing to Consent [24 CFR 5.232]

If any family member who is required to sign a consent form fails to do so, the PHA will deny admission to applicants and terminate assistance of participants.

The family may request an informal review (applicants) or informal hearing (participants) in accordance with PHA procedures.

7-I.B. OVERVIEW OF VERIFICATION REQUIREMENTS

Use of Other Programs' Income Determinations [24-CFR-5.609(c)(3) and Notice PIH 2023-27]

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. PHAs are not required to accept or use determinations of income from other federal means-tested forms of assistance. If the PHA adopts a policy to accept this type of verification, the PHA must establish 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 Woman, 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 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 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.

PHA Policy

When available and applicable, the PHA will accept other programs' Safe Harbor determinations of income at annual reexamination to determine the family's total annual income. The PHA will still require third-party verification of all deductions such as the health and medical care expense or childcare expense deductions.

Further, if the family is eligible for and claims the disability assistance expense or childcare expense deductions, where applicable, the PHA will obtain third-party verification of the amount of employment income of the individual(s) enabled to work in order to cap the respective expenses as required.

Prior to using any Safe Harbor determination from another program, the PHA will ask the family if they agree with the income amounts listed. If the family disputes the income amounts on the Safe Harbor determination, the PHA will obtain third-party verification of all sources of income and assets (as applicable).

The PHA will not accept other programs' determinations of income for any new admission or interim reexamination.

With the exception of income determinations made under the Low-Income Housing Tax Credit (LIHTC) program, the PHA will accept Safe Harbor determinations from any of the programs listed above.

In order to be acceptable, the income determination must:

- Be dated within 12 months of the dates listed above;

- State the family size;

- Be for the entire family (i.e., the family -members listed in the documentation 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;

The determination need not list each source of income individually. If the PHA does not receive any acceptable income determination documentation or is unable to obtain documentation, then the PHA will revert to third-party verification of income for the family.

When families present multiple verifications from the same or different acceptable Safe Harbor programs, the PHA will use the most recent income determination, unless the family presents acceptable evidence that the PHA should consider an alternative verification from a different Safe Harbor source.

When the PHA uses a Safe Harbor income determination from another program, and the family's income subsequently changes, the family is required to report the change to the PHA. Depending on when the change occurred, the change may or may not impact the PHA's calculation of the family's total annual income. Changes that occur between the time the PHA receives the Safe Harbor documentation, and the effective date of the family's annual reexamination will not be considered. If the family has a change in income that occurs after the annual reexamination effective date, the PHA will conduct an interim reexamination if the change meets the requirements for performing an interim reexamination as outlined in Chapter 11. In this case, the PHA will use third-party verification to verify the change.

HUD's Verification Hierarchy [Notice PIH 2018-18]

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.

In order of priority, the forms of verification that the PHA will use are:

- Up-front Income Verification (UIV) using HUD's Enterprise Income Verification (EIV) system
- Up-front Income Verification (UIV) using a non-HUD system
- Written Third-Party Verification (may be provided by applicant or participant)
- Written Third-party Verification Form
- Oral Third-party Verification
- Self-Certification

Each of the verification methods is discussed in subsequent sections below.

Requirements for Acceptable Documents

PHA Policy

Any documents used for verification must be the original (not photocopies) and generally must be dated within **120 days of receipt by the PHA. Statements dated within the appropriate benefit year are acceptable for fixed sources of income. within 60 days of OHA request.** The documents must not be damaged, altered or in any way illegible.

Printouts from webpages are considered original documents.

The PHA staff member who views the original document must make a photocopy.

Any family self-certifications 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.

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, 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.

PHA Policy

The PHA will document, in the family file, the following:

- Reported family annual income
- Value of assets
- Expenses related to deductions from annual income
- Other factors influencing adjusted income

When the PHA is unable to obtain third-party verification, the PHA will document in the family file the reason that third-party verification was not available [24 CFR 982.516(a)(2); Notice PIH_-2018--18].

7-I.C. UP-FRONT INCOME VERIFICATION (UIV)

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. 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.

See Chapter 6 for the PHA's policy on the use of UIV/EIV to project annual income.

Upfront Income Verification Using 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 mandatory reexaminations or recertifications of family composition and income in accordance with 24 CFR 5.236 and administrative guidance issued by HUD. **However, the PHA is not required to verify income information in EIV at annual reexam when Safe Harbor verification is used to determine a family's income [Notice PIH 2023-27].** The EIV system contains data showing earned income, unemployment benefits, social security benefits, and SSI benefits for participant families. The following policies apply to the use of HUD's EIV system.

EIV Income and IVT Reports

The data shown on income and income validation tool (IVT) reports is updated quarterly. Data may be between 3 and 6 months old at the time reports are generated.

PHA Policy

The PHA will obtain income and IVT reports for annual reexaminations on a monthly basis. Reports will be generated as part of the regular reexamination process.

Income and IVT reports will be compared to family-provided information as part of the annual reexamination process. Income reports may be used in the calculation of annual income, as described in Chapter 6-I.C.

Income reports may also be used to meet the regulatory requirement for third party verification, as described above. Policies for resolving discrepancies between income reports and family-provided information will be resolved as described in Chapter 6-I.C. and in this chapter.

Income and IVT reports will be used in interim reexaminations to identify any discrepancies between reported income and income shown in the EIV system, and as necessary to verify earned income, and to verify and calculate unemployment benefits, Social Security and/or SSI benefits. EIV will also be used to verify that families claiming zero income are not receiving income from any of these sources.

Income and IVT reports will be retained in participant files with the applicable annual or interim reexamination documents.

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.

However, the PHA will not use income information in EIV at annual reexam when Safe Harbor verification is used to determine a family's income.

EIV Identity Verification

The EIV system verifies tenant identities against SSA records. These records are compared to PIC 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 2018-18].

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

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 PIC/SSA discrepancies by obtaining appropriate documentation from the participant. When the PHA determines that discrepancies exist due to PHA errors such as spelling errors or incorrect birth dates, the errors will be corrected promptly.

Upfront Income Verification Using Non-HUD Systems (Optional)

In addition to mandatory use of the EIV system, HUD encourages PHAs to utilize other upfront verification sources.

PHA Policy

The PHA will inform all applicants and participants of its use of the following UIV resources during the admission and reexamination process:

HUD's EIV system

- N-Focus
- Child Support
- Unemployment

7-I.D. THIRD-PARTY WRITTEN AND ORAL VERIFICATION

HUD's current verification hierarchy defines two types of written third-party verification. The more preferable form, "written third-party verification," consists of an original document generated by a third-party source, which may be received directly from a third-party source or provided to the PHA by the family. If written third-party verification is not available, the PHA must attempt to obtain a "written third-party verification form." This is a standardized form used to collect information from a third party.

Written Third-Party Verification [Notice PIH 2018-18]

Written third-party verification documents must be original and authentic and may be supplied by the family or

received from a third-party source.

Examples of acceptable tenant-provided documents include, but are not limited to: pay stubs, payroll summary reports, employer notice or letters of hire and termination, SSA benefit verification letters, bank statements, child support payment stubs, welfare benefit letters and/or printouts, and unemployment monetary benefit notices.

The PHA is required to obtain, at minimum, two current and consecutive pay stubs for determining annual income from wages.

The PHA may reject documentation provided by the family if the document is not an original, if the document appears to be forged, or if the document is altered, mutilated, or illegible.

Written, third-party verification includes an original or authentic document generated by a third-party source dated within 120 days of the date received by the PHA [Notice PIH 2023-27].

PHAs may accept a statement dated within the appropriate benefit year for fixed income sources [Notice PIH 2023-27].

PHA Policy

Third-party documents provided by the family must be dated within ~~120~~60 days of the PHA request date. **The PHA will accept a statement dated within the appropriate benefit year for fixed income sources.**

If the PHA determines that third-party documents provided by the family are not acceptable, the PHA will explain the reason to the family and request additional documentation.

As verification of earned income, the PHA will require the family to provide the two most current, consecutive pay stubs. At the PHA's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income, fluctuating schedule, etc.), the PHA may request additional paystubs or a payroll record.

Written Third-Party Verification Form

When upfront verification is not available and the family is unable to provide written third-party documents, the PHA must request a written third-party verification form. HUD's position is that this traditional third-party verification method presents administrative burdens and risks which may be reduced through the use of family-provided third-party documents.

PHAs may mail, fax, or email third-party written verification form requests to third-party sources.

PHA Policy

The PHA will send third-party verification forms directly to the third party.

Third-party verification forms will be sent when third-party verification documents are unavailable or are rejected by the PHA.

Oral Third-Party Verification [Notice PIH 2018-18]

For third-party oral verification, PHAs contact sources, identified by UIV techniques or by the family, by telephone or in person.

Oral third-party verification is mandatory if neither form of written third-party verification is **available**.

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 should 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.

PHA Policy

In collecting third-party oral verification, PHA staff will record in the family's file the name and title of the person contacted, the date and time of the conversation (or attempt), the telephone number used, and the facts provided.

When any source responds verbally to the initial written request for verification the PHA will accept the verbal response as oral verification but will also request that the source complete and return any verification forms that were provided.

When Third-Party Verification is Not Required [Notice PIH 2018-18]

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

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.

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

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 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

The PHA will accept a self-certification from a family as verification of assets disposed of for less than fair market value.

Value of Assets and Asset Income [24 CFR 982.516(a)]

For families with net assets totaling \$5,000 or less, the PHA may accept the family's declaration of asset value and anticipated asset income. However, the PHA is required to obtain third-party verification of all assets regardless of the amount during the intake process and at least every three years thereafter.

PHA Policy

For families with net assets totaling \$5,000 or less, the PHA will accept the family's self-certification of the value of family assets and anticipated asset income when applicable. The family's declaration must show each asset and the amount of income expected from that asset. All family members 18 years of age and older must sign the family's declaration.

The PHA will use third-party documentation for assets as part of the intake process, whenever a family member is added to verify the individual's assets, and every three years thereafter.

7-I.E. SELF-CERTIFICATION

When HUD requires third-party verification, self-certification or “tenant declaration,” is used as a last resort when the PHA is unable to obtain third-party verification.

Self-certification, however, is an acceptable form of verification when:

- A source of income is fully excluded
- Net family assets total \$5,000 or less and the PHA has adopted a policy to accept self certification at annual recertification, when applicable
- The PHA has adopted a policy to implement streamlined annual recertifications for fixed sources of income (See Chapter 11)

When the PHA was required to obtain third-party verification but instead relies on a tenant declaration for verification of income, assets, or expenses, the family’s file must be documented to explain why third-party verification was not available.

PHA Policy

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 not 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 must be signed in the presence of a PHA representative or PHA notary public.

PART II: VERIFYING FAMILY INFORMATION

7-II.A. VERIFICATION OF LEGAL IDENTITY

PHA Policy

The PHA will require families to furnish verification of legal identity for each household member.

Verification of Legal Identity for Adults	Verification of Legal Identity for Children
Certificate of birth, naturalization papers Church issued baptismal certificate. Current, valid driver's license or Department of Motor Vehicles identification card Current temporary driver's license or Department of Motor Vehicles identification card without photo U.S. military discharge (DD 214) Current U.S. passport Current Federal or State ID with a photo Current government employer identification card with picture	Certificate of birth Adoption papers Custody agreement Health and Human Services ID Certified school records

If a document submitted by a family is illegible for any reason or otherwise questionable, more than one of these documents may be required.

If none of these documents can be provided and at the PHA's discretion, a third party who knows the person may attest to the person's identity. **The certification must be provided in a format acceptable to the PHA and must be signed by the family member whose information or status is being verified.**

Persons who are homeless can provide identification from a social worker or homeless shelter coordinator.

The certification must be provided in a format acceptable to OHA and be signed in the presence of a PHA representative or PHA notary public.

Legal identity will be verified for all applicants at the time of application and 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.B. SOCIAL SECURITY NUMBERS [24 CFR 5.216, Notice PIH 2018-24]

The family must provide documentation of a valid social security number (SSN) for each member of the household, with the exception of individuals who do not contend eligible immigration status. Exemptions also include existing program participants who were at least 62 years of age as of January 31, 2010, and had not previously disclosed an SSN.

Note that an individual who previously declared to have eligible immigration status may not change their declaration for the purpose of avoiding compliance with the SSN disclosure and documentation requirements or penalties associated with noncompliance with these requirements. Nor may the head of household opt to remove a household member from the family composition for this purpose.

The PHA must accept the following documentation as acceptable evidence of the social security number:

- An original SSN card issued by the Social Security Administration (SSA)
- An original SSA-issued document, which contains the name and SSN of the individual
- An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual

While PHAs must attempt to gather third-party verification of SSNs prior to admission as listed above, PHAs also have the option of accepting a self-certification and a third-party document (such as a bank statement, utility or cell phone bill, or benefit letter) with the applicant's name printed on it to satisfy the SSN disclosure requirement if the PHA has exhausted all other attempts to obtain the required documentation. If verifying an individual's SSN using this method, the PHA must document why the other SSN documentation was not available [Notice PIH 2023-27].

PHA Policy

The PHA will verify an individual's SSN in the situations described above using the method described above as a last resort when no other forms of verification of the individual's SSN are available.

The PHA may only reject documentation of an SSN provided by an applicant or participant if the document is not an original document or if the original document has been altered, mutilated, is illegible, or appears to be forged.

PHA Policy

The PHA will explain to the applicant or participant the reasons the document is not acceptable and request that the individual obtain and submit acceptable documentation of the SSN to the PHA within 90 days.

In the case of Moderate Rehabilitation Single Room Occupancy (SRO) individuals, the required documentation must be provided within 90 calendar days from the date of admission into the program. The PHA must grant one additional 90-day extension if it determines that the applicant's failure to comply was due to circumstances that were beyond the applicant's control and could not have been reasonably foreseen.

PHA Policy

The PHA will grant one additional 90-day extension if needed for reasons beyond the participant's control such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency. If the individual fails to comply with SSN disclosure and documentation requirements upon expiration of the provided time period, the PHA will terminate the individual's assistance.

If an applicant family includes a child under 6 years of age who joined the household within the 6 months prior to the date of voucher issuance, an otherwise eligible family may be admitted to the program and the family must provide documentation of the child's SSN within 90 days of the effective date of the initial HAP contract. A 90-day extension will be granted if the PHA determines that the participant's failure to comply was due to unforeseen circumstances and was outside of the participant's control.

PHA Policy

The PHA will grant one additional 90-day extension if needed for reasons beyond the applicant's control, such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.

When a participant requests to add a new household member who is at least 6 years of age, or who is under the age of 6 and has an SSN, the participant must provide the complete and accurate SSN assigned to each new member at the time of reexamination or recertification, in addition to the documentation required to verify it. The PHA may not add the new household member until such documentation is provided.

When a participant requests to add a new household member who is under the age of 6 and has not been assigned an SSN, the participant must provide the SSN assigned to each new child and the required documentation within 90 calendar days of the child being added to the household. A 90-day extension will be granted if the PHA determines that the participant's failure to comply was due to unforeseen circumstances and was outside of the participant's control. During the period the PHA is awaiting documentation of the SSN, the child will be counted as part of the assisted household.

PHA Policy

The PHA will grant one additional 90-day extension if needed for reasons beyond the participant's control such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.

Social security numbers must be verified only once during continuously assisted occupancy.

PHA Policy

The PHA will verify each disclosed SSN by:

Obtaining documentation from applicants and participants that is acceptable as evidence of social security numbers.

Making a copy of the original documentation submitted, returning it to the individual, and retaining a copy in the file folder.

Once the individual's verification status is classified as "verified," the PHA may, at its discretion, remove and destroy copies of documentation accepted as evidence of social security numbers. The retention of the EIV Summary Report or Income Report is adequate documentation of an individual's SSN.

PHA Policy

Once an individual's status is classified as "verified" in HUD's EIV system, the PHA will not remove and destroy copies of documentation accepted as evidence of social security numbers.

7-II.C. DOCUMENTATION OF AGE

A birth certificate or other official record of birth is the preferred form of age verification for all family members. For elderly family members an original document that provides evidence of the receipt of social security retirement benefits is acceptable.

PHA Policy

If an official record of birth or evidence of social security retirement benefits cannot be provided, the PHA will require the family to submit other documents that support the reported age of the family member (e.g., school records, driver's license if birth year is recorded) and to provide a self-certification.

Age must be verified only once during continuously -assisted occupancy.

7-II.D. FAMILY RELATIONSHIPS

Applicants and program participants are required to identify the relationship of each household member to the head of household. Definitions of the primary household relationships are provided in the Eligibility chapter.

PHA Policy

Family relationships are verified only to the extent necessary to determine a family's eligibility and level of assistance. Certification by the head of household normally is sufficient verification of family relationships.

Marriage

PHA Policy

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a marital relationship, the PHA will require the family to document the marriage.

A marriage certificate generally is required to verify that a couple is married.

In the case of a common law marriage, the couple must demonstrate that they hold themselves to be married (e.g., by telling the community they are married, calling each other husband and wife, using the same last name, filing joint income tax returns).

Separation or Divorce

PHA Policy

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a separation or divorce, the PHA will require the family to provide documentation of the divorce or separation.

A certified copy of a divorce decree, signed by a court officer, is required to document that a couple is divorced.

A copy of a court-ordered maintenance or other court record is required to document a separation.

If no court document is available, documentation from a community-based agency will be accepted.

Absence of Adult Member

PHA Policy

If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation of another address at which the person resides such as a lease or utility bill), **if the PHA so requests.**

Foster Children and Foster Adults

PHA Policy

Third-party verification from the state or local government agency responsible for the placement of the individual with the family is required.

7-II.E. VERIFICATION OF STUDENT STATUS

General Requirements

PHA Policy

The PHA requires families to provide information about the student status of all students who are 18 years of age or older. This information will be verified only if:

The family reports full-time student status for an adult other than the head, spouse, or cohead.

The family reports childcare expenses to enable a family member to further their education.

The family includes a student enrolled in an *institution of higher education*.

Restrictions on Assistance to Students Enrolled in Institutions of Higher Education

This section applies only to students who are seeking assistance on their own, separately from their parents. It does not apply to students residing with parents who are seeking or receiving HCV assistance.

PHA Policy

In accordance with the verification hierarchy described in section 7-1.B, the PHA will determine whether the student is exempt from the restrictions in 24 CFR 5.612 by verifying any one of the following exemption criteria:

The student is enrolled at an educational institution that does not meet the definition of *institution of higher education* in the Higher Education Act of 1965 (see section Exhibit 3-2).

The student is at least 24 years old.

The student is a veteran, as defined in section 3-II.E.

The student is married.

The student has at least one dependent child, as defined in section 3-II.E.

The student is a person with disabilities, as defined in section 3-II.E, and was receiving assistance prior to November 30, 2005.

If the PHA cannot verify at least one of these exemption criteria, the PHA will conclude that the student is subject to the restrictions on assistance at 24 CFR 5.612. In addition to verifying the student's income eligibility, the PHA will then proceed to verify either the student's parents' income eligibility (see section 7-III.J) or the student's independence from their parents (see below).

Independent Student

PHA Policy

The PHA will verify a student's independence from their parents to determine that the student's parents' income is not relevant for determining the student's eligibility by doing all of the following:

Either reviewing and verifying previous address information to determine whether the student has established a household separate from their parents for at least one year, or reviewing and verifying documentation relevant to determining

whether the student meets the U.S. Department of Education's definition of *independent student* (see section 3-II.E)

Reviewing the student's prior year income tax returns to verify the student is independent or verifying the student meets the U.S. Department of Education's definition of *independent student* (see section 3-II.E)

Requesting and obtaining written certification directly from the student's parents identifying the amount of support they will be providing to the student, even if the amount of support is \$0, except in cases in which the PHA determines that the student is a *vulnerable youth* (see section 3-II.E)

7-II.F. DOCUMENTATION OF DISABILITY

The PHA must verify the existence of a disability in order to allow certain income disallowances and deductions from income. The PHA is not permitted to inquire about the nature or extent of a person's disability [24 CFR 100.202(c)]. The PHA may not inquire about a person's diagnosis or details of treatment for a disability or medical condition. If the PHA receives a verification document that provides such information, the PHA will not place this information in the tenant file. Under no circumstances will the PHA request a participant's medical record(s). For more information on health care privacy laws, see the Department of Health and Human Services' website at <http://www.hhs.gov/ocr/privacy/>.

The above cited regulation does not prohibit the following inquiries, provided these inquiries are made of all applicants, whether or not they are persons with disabilities [VG, p. 24]:

- Inquiry into an applicant's ability to meet the requirements of ownership or tenancy
- Inquiry to determine whether an applicant is qualified for a dwelling available only to persons with disabilities or to persons with a particular type of disability
- Inquiry to determine whether an applicant for a dwelling is qualified for a priority available to persons with disabilities or to persons with a particular type of disability
- Inquiring whether an applicant for a dwelling is a current illegal abuser or addict of a controlled substance
- Inquiring whether an applicant has been convicted of the illegal manufacture or distribution of a controlled substance

Family Members Receiving SSA Disability Benefits

Verification of the receipt of disability benefits from the Social Security Administration (SSA) is sufficient verification of disability for the purpose of qualifying for waiting list preferences (if applicable) or certain income disallowances and deductions [VG, p. 23].

PHA Policy

For family members claiming disability who receive disability benefits from the SSA, the PHA will attempt to obtain information about disability benefits through the HUD Enterprise Income Verification (EIV) system. If documentation from HUD's EIV System is not available, the PHA will request a current (dated within the ~~appropriate benefit year~~ ~~last 60 days~~) SSA benefit verification letter from each family member claiming disability status. If the family is unable to provide the document(s), the PHA will ask the family to request a benefit verification letter by either calling SSA at 1-800-772-1213, or by requesting it from www.ssa.gov. Once the applicant or participant receives the benefit verification letter they will be required to provide it to the PHA.

Family Members Not Receiving SSA Disability Benefits

Receipt of veteran's disability benefits, worker's compensation, or other non-SSA benefits based on the individual's claimed disability are not sufficient verification that the individual meets HUD's definition of disability in 24 CFR 5.403.

PHA Policy

For family members claiming disability who do not receive disability benefits from the SSA, a knowledgeable professional must provide third-party verification that the family member meets the HUD definition of disability. See the Eligibility chapter for the HUD definition of disability. The knowledgeable professional will verify whether the family member does or does not meet the HUD definition.

7-II.G. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5.508]

Overview

Housing assistance is not available to persons who are not citizens, nationals, or eligible immigrants. Prorated assistance is provided for "mixed families" containing both eligible and ineligible persons. A detailed discussion of eligibility requirements is in the Eligibility chapter. This verifications chapter discusses HUD and PHA verification requirements related to citizenship status.

The family must provide a certification that identifies each family member as a U.S. citizen, a U.S. national, an eligible noncitizen or an ineligible noncitizen and submit the documents discussed below for each family member. Once eligibility to receive assistance has been verified for an individual it need not be collected or verified again during continuously -assisted occupancy. [24 CFR 5.508(g)(5)]

U.S. Citizens and Nationals

HUD requires a declaration for each family member who claims to be a U.S. citizen or national. The declaration must be signed personally by any family member 18 or older and by a guardian for minors.

The PHA may request verification of the declaration by requiring presentation of a birth certificate, United States passport or other appropriate documentation.

PHA Policy

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***Documents Required***

All family members claiming eligible immigration status must declare their status in the same manner as U.S. citizens and nationals.

The documentation required for eligible noncitizens varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, age, and the date on which the family began receiving HUD-funded assistance. Exhibit 7-1 at the end of this chapter summarizes documents family members must provide.

PHA Verification [HCV GB, pp. 5-3 and 5-7]

For family members age 62 or older who claim to be eligible immigrants, proof of age is required in the manner described in 7-II.C. of this plan. No further verification of eligible immigration status is required.

For family members under the age of 62 who claim to be eligible immigrants, 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.

7-II.H. VERIFICATION OF PREFERENCE STATUS

The PHA must verify any preferences claimed by an applicant that determined placement on the waiting list.

PHA Policy

The PHA will offer a preference to any family that has been terminated from its HCV program due to insufficient program funding. The PHA will verify this preference using the PHA's termination records.

The PHA also offers a preference for victims of domestic violence, dating violence, sexual assault, or stalking, as described in Section 4-III.C. To verify that applicants qualify for the preference, the PHA will follow documentation requirements outlined in Section 16-IX.D.

PART III: VERIFYING INCOME AND ASSETS

Chapter 6, Part I of this plan describes in detail the types of income that are included and excluded and how assets and income from assets are handled. Any assets and income reported by the family must be verified. This part provides PHA policies that supplement the general verification procedures specified in Part I of this chapter.

7-III.A. EARNED INCOME

Tips

PHA Policy

Unless tip income is included in a family member's W-2 by the employer, persons who work in industries where tips are standard will be required to sign a certified estimate of tips received for the prior year and tips anticipated to be received in the coming year.

Wages

PHA Policy

For wages other than tips, the family must provide originals of the two most current, consecutive pay stubs.

7-III.B. BUSINESS AND SELF EMPLOYMENT INCOME

PHA Policy

Business owners and self-employed persons will be required to provide:

An audited financial statement for the previous fiscal year if an audit was conducted. If an audit was not conducted, a statement of income and expenses must be submitted and the business owner or self-employed person must certify to its accuracy.

All schedules completed for filing federal and local taxes in the preceding year.

If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.

The PHA will provide a format for any person who is unable to provide such a statement to record income and expenses for the coming year. The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations.

At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.

If a family member has been self-employed less than three (3) months, the PHA will accept the family member's certified estimate of income and schedule an interim reexamination in three (3) months. If the family member has been self-employed for three (3) to twelve (12) months the PHA will require the family to provide documentation of income and expenses for this period and use that information to project income.

7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS

For policies governing streamlined income determinations for fixed sources of income, please see Chapter 11.

Social Security/SSI Benefits

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, ~~OHA will request a current~~ SS and/or SSI benefit letter (dated within the appropriate benefit year) for verification letter 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(s), ~~OHA will~~ 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 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 ~~about social security/SSI benefits~~ 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 ~~HUD systems, OHA will~~ request a current SSA benefit verification letter (dated within the appropriate benefit year) from each family member that receives SS and/or SSI ~~social security~~ benefits. If the family is unable to provide the document or documents, the PHA should (s) ~~OHA will~~ 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.

7-III.D. ALIMONY OR CHILD SUPPORT

PHA Policy

The methods the PHA will use to verify alimony and child support payments differ depending on whether the family declares that it receives regular payments.

OHA will review child support website records to determine if applicants and participant families receive child support payments.

If the family declares that it ***receives regular payments***, verification will be obtained in the following order of priority:

- Copies of the receipts and/or payment stubs for the 60 days 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

If the family declares that it ***receives irregular or no payments***, in addition to the verification process listed above, the family must provide evidence that it has taken all reasonable efforts to collect amounts due. This may include:

- A statement from any agency responsible for enforcing payment that shows the family has requested enforcement and is cooperating with all enforcement efforts

- If the family has made independent efforts at collection, a written statement from the attorney or other collection entity that has assisted the family in these efforts

Note: Families are not required to undertake independent enforcement action.

7-III.E. ASSETS AND INCOME FROM ASSETS

Assets Disposed of for Less than Fair Market Value

The family must certify whether any assets have been disposed of for less than fair market value in the preceding two years. The PHA needs to verify only those certifications that warrant documentation [HCV GB, p. 5-28].

PHA Policy

The PHA will verify the value of assets disposed of only if:

The PHA does not already have a reasonable estimation of its value from previously collected information, or

The amount reported by the family in the certification appears obviously in error.

Example 1: An elderly participant reported a \$10,000 certificate of deposit at the last annual reexamination and the PHA verified this amount. Now the person reports that she has given this \$10,000 to her son. The PHA has a reasonable estimate of the value of the asset; therefore, reverification of the value of the asset is not necessary.

Example 2: A family member has disposed of its 1/4 share of real property located in a desirable area and has valued her share at approximately \$5,000. Based upon market conditions, this declaration does not seem realistic. Therefore, the PHA will verify the value of this asset.

7-III.F. NET INCOME FROM RENTAL PROPERTY

PHA Policy

The family must provide:

A current executed lease for the property that shows the rental amount or certification from the current tenant

A self-certification from the family members engaged in the rental of property providing an estimate of expenses for the coming year and the most recent IRS Form 1040 with Schedule E (Rental Income). If schedule E was not prepared, the PHA will require the family members involved in the rental of property to provide a self-certification of income and expenses for the previous year and may request documentation to support the statement including: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense.

7-III.G. RETIREMENT ACCOUNTS

PHA Policy

The PHA will accept written third-party documents supplied by the family as evidence of the status of retirement accounts.

The type of original document that will be accepted depends upon the family member's retirement status.

Before retirement, the PHA will accept an original document from the entity holding the account dated within ~~with a date that shows it is the most recently scheduled statement for~~ the appropriate benefit year. ~~account but in no case earlier than 6 months from the effective date of the examination.~~

Upon retirement, the PHA will accept an original document dated within the appropriate benefit year from the entity holding the account that reflects any distributions of the account balance, any lump sums taken and any regular payments.

After retirement, the PHA will accept an original document from the entity holding the account dated within the appropriate benefit year ~~no earlier than 12 months before~~ that reflects any distributions of the account balance, any lump sums taken and any regular payments.

7-III.H. INCOME FROM EXCLUDED SOURCES

A detailed discussion of excluded income is provided in Chapter 6, Part I.

HUD guidance on verification of excluded income draws a distinction between income which is fully excluded and income which is only partially excluded.

For fully excluded income, the PHA is **not** required to follow the verification hierarchy, document why third-party verification is not available, or report the income on the 50058. Fully excluded income is defined as income that is entirely excluded from the annual income determination (for example, food stamps, earned income of a minor, or foster care funds) [Notice PIH 2013-04].

PHAs may accept a family's signed application or reexamination form as self-certification of fully excluded income. They do not have to require additional documentation. However, if there is any doubt that a source of income qualifies for full exclusion, PHAs have the option of requiring additional verification.

For partially excluded income, the PHA **is** required to follow the verification hierarchy and all applicable regulations, and to report the income on the 50058. Partially excluded income is defined as income where only a certain portion of what is reported by the family qualifies to be excluded and the remainder is included in annual income (for example, the income of an adult full-time student), ~~or income excluded under the earned income disallowance).~~

PHA Policy

The PHA will accept the family's self-certification as verification of fully excluded income. The PHA may request additional documentation if necessary to document the income source.

The PHA will verify the source and amount of partially excluded income as described in Part 1 of this chapter.

7-III.I. ZERO ~~ANNUAL~~ INCOME FAMILIES [Notice PIH 2023-27] STATUS

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

The PHA will check UIV sources and/or ~~may~~ request information from third-party sources to verify that certain forms of income such as unemployment benefits, TANF, SS, SSI, ~~earned income, child support, etc., and earnings~~ are not being received by families claiming to have zero annual income.

The PHA will 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 conduct interims in accordance with PHA policy in Chapter 11.

7-III.J. STUDENT FINANCIAL ASSISTANCE [Notice PIH 2015-21]

Any financial assistance, in excess of amounts received for tuition, fees, and other required charges that a person attending an institution of higher education receives under the Higher Education Act of 1965, from private sources, or from an institution of higher education must be considered income unless the student is over the age of 23 with dependent children or is residing with parents who are seeking or receiving HCV assistance [24 CFR 5.609(b)(9) and FR 4/10/06].

For students over the age of 23 with dependent children or students residing with parents who are seeking or receiving HCV assistance, the full amount of student financial assistance is excluded from annual income [24 CFR 5.609(c)(6)]. The full amount of student financial assistance is also excluded for students attending schools that do not qualify as institutions of higher education (as defined in Exhibit 3-2). Excluded amounts are verified only if, without verification, the PHA would not be able to determine whether or to what extent the income is to be excluded (see section 7-III.H).

PHA Policy

For a student subject to having a portion of their student financial assistance included in annual income in accordance with 24 CFR 5.609(b)(9), the PHA will request written third-party verification of both the source and the amount. Family-provided documents from the educational institution attended by the student will be requested, as well as documents generated by any other person or entity providing such assistance, as reported by the student.

In addition, the PHA will request written verification of the student's tuition, fees, and other required charges. If the PHA is unable to obtain third-party written verification of the requested information, the PHA will pursue other forms of verification following the verification hierarchy in section 7-I.B.

7-III.K. PARENTAL INCOME OF STUDENTS SUBJECT TO ELIGIBILITY RESTRICTIONS

If a student enrolled at an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the income of the student's parents must be considered when determining income eligibility, unless the student is determined independent from their parents or a *vulnerable youth* in accordance with PHA policy [24 CFR 5.612, FR_Notice 4/10/06, p._18146, and FR_Notice 9/21/16].

This provision does not apply to students residing with parents who are seeking or receiving HCV assistance. It is limited to students who are seeking or receiving assistance on their own, separately from their parents.

PHA Policy

If the PHA is required to determine the income eligibility of a student's parents, the PHA will request an income declaration and certification of income from the appropriate parent(s) (as determined in section 3-II.E). The PHA will send the request directly to the parents, who will be required to certify to their income under penalty of perjury. The parents will be required to submit the information directly to the PHA. The required information must be submitted (postmarked) within 10 business days of the date of the PHA's request or within any extended timeframe approved by the PHA.

The PHA reserves the right to request and review supporting documentation at any time if it questions the declaration or certification. Supporting documentation may include, but is not limited to, Internal Revenue Service (IRS) tax returns, consecutive and original pay stubs, bank statements, pension benefit statements, benefit award letters, and other official and authentic documents from a federal, state, or local agency.

PART IV: VERIFYING MANDATORY DEDUCTIONS

7-IV.A. DEPENDENT AND ELDERLY/DISABLED HOUSEHOLD DEDUCTIONS

The dependent and elderly/disabled family deductions require only that the PHA verify that the family members identified as dependents or elderly/disabled persons meet the statutory definitions. No further verifications are required.

Dependent Deduction

See Chapter 6 (6-II.B.) for a full discussion of this deduction. The PHA must verify that:

- Any person under the age of 18 for whom the dependent deduction is claimed is not the head, spouse, or cohead of the family and is not a foster child
- Any person age 18 or older for whom the dependent deduction is claimed is not a foster adult or live-in aide, and is a person with a disability or a full time student

Elderly/Disabled Family Deduction

See Eligibility chapter for a definition of elderly and disabled families and Chapter 6 (6-II.C.) for a discussion of the deduction. The PHA must verify that the head, spouse, or cohead is 62 years of age or older or a person with disabilities.

7-IV.B. MEDICAL EXPENSE DEDUCTION

Policies related to medical expenses are found in 6-II.D. The amount of the deduction will be verified following the standard verification procedures described in Part I.

Amount of Expense

PHA Policy

Medical expenses will be verified through:

Written third-party documents provided by the family, such as pharmacy printouts or receipts.

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 medical expenses during the upcoming 12 months.

Written third-party verification forms, if the family is unable to provide acceptable documentation.

If third-party or document review is not possible, written family certification as to costs anticipated to be incurred during the upcoming 12 months.

In addition, the PHA must verify that:

- The household is eligible for the deduction.
- The costs to be deducted are qualified medical expenses.
- The expenses are not paid for or reimbursed by any other source.
- Costs incurred in past years are counted only once.

Eligible Household

The medical expense deduction is permitted only for households in which the head, spouse, or cohead is at least 62, or a person with disabilities. The PHA must verify that the family meets the definition of an elderly or disabled family provided in the Eligibility chapter and as described in Chapter 7 (7-IV.A.) of this plan.

Qualified Expenses

To be eligible for the medical expenses deduction, the costs must qualify as medical expenses. See Chapter 6 (6-II.D.) for the PHA's policy on what counts as a medical expense.

Unreimbursed Expenses

To be eligible for the medical expenses deduction, the costs must not be reimbursed by another source.

PHA Policy

The family will be required to certify that the medical expenses are not paid or reimbursed to the family from any source. If expenses are verified through a third party, the third party must certify that the expenses are not paid or reimbursed from any other source.

Expenses Incurred in Past YearsPHA Policy

When anticipated costs are related to on-going payment of medical bills incurred in past years, the PHA will verify:

- The anticipated repayment schedule

- The amounts paid in the past, and

- Whether the amounts to be repaid have been deducted from the family's annual income in past years

7-IV.C. DISABILITY ASSISTANCE **EXPENSES**

Policies related to disability assistance expenses are found in 6-II.E. The amount of the deduction will be verified following the standard verification procedures described in Part I.

Amount of Expense

Attendant Care

PHA Policy

The PHA will accept written third-party documents provided by the family.

If family-provided documents are not available, the PHA will provide a third-party verification form directly to the care provider requesting the needed information.

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.

If third-party verification is not possible, written family certification as to costs anticipated to be incurred for the upcoming 12 months.

Auxiliary Apparatus

PHA Policy

Expenses for auxiliary apparatus will be verified through:

Written third-party documents provided by the family, such as billing statements for purchase of auxiliary apparatus, or other evidence of monthly payments or total payments that will be due for the apparatus during the upcoming 12 months.

Third-party verification form signed by the provider, if family-provided documents are not available.

If third-party verification is not possible, written family certification of estimated apparatus costs for the upcoming 12 months.

In addition, the PHA must verify that:

- The family member for whom the expense is incurred is a person with disabilities (as described in 7-II.F above).
- The expense permits a family member, or members, to work (as described in 6-II.E.).
- The expense is not reimbursed from another source (as described in 6-II.E.).

Family Member is a Person with Disabilities

To be eligible for the disability assistance expense deduction, the costs must be incurred for attendant care or auxiliary apparatus expense associated with a person with disabilities. The PHA will verify that the expense is incurred for a person with disabilities (See 7-II.F.).

Family Member(s) Permitted to Work

The PHA must verify that the expenses claimed actually enable a family member, or members, (including the person with disabilities) to work.

PHA Policy

The PHA will request third-party verification from a rehabilitation agency or knowledgeable medical professional indicating that the person with disabilities requires attendant care or an auxiliary apparatus to be employed, or that the attendant care or auxiliary apparatus enables another family member, or members, to work (See 6-II.E.). This documentation may be provided by the family.

If third-party verification has been attempted and is either unavailable or proves unsuccessful, the family must certify that the disability assistance expense frees a family member, or members (possibly including the family member receiving the assistance), to work.

Unreimbursed Expenses

To be eligible for the disability expenses deduction, the costs must not be reimbursed by another source.

PHA Policy

The family will be required to certify that attendant care or auxiliary apparatus expenses are not paid by or reimbursed to the family from any source.

7-IV.D. CHILDCARE EXPENSES

Policies related to childcare expenses are found in Chapter 6 (6-II.F). The amount of the deduction will be verified following the standard verification procedures described in Part I of this chapter. In addition, the PHA must verify that:

- The child is eligible for care (12 or younger).
- The costs claimed are not reimbursed.
- The costs enable a family member to work, actively seek work, or further their education.
- The costs are for an allowable type of childcare.
- The costs are reasonable.

Eligible Child

To be eligible for the childcare deduction, the costs must be incurred for the care of a child under the age of 13. The PHA will verify that the child being cared for (including foster children) is under the age of 13 (See 7-II.C.).

Unreimbursed Expense

To be eligible for the childcare deduction, the costs must not be reimbursed by another source.

PHA Policy

The family (and the care provider) will be required to certify that the childcare expenses are not paid or reimbursed to the family from any source.

Pursuing an Eligible Activity

The PHA must verify that the family member(s) that the family has identified as being enabled to seek work, pursue education, or be gainfully employed, are actually pursuing those activities.

PHA Policy

Information to be Gathered

The PHA will verify information about how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the time required for study (for students), the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.

Seeking Work

Whenever possible the PHA will use documentation from a state or local agency that monitors work-related requirements (e.g., welfare or unemployment). In such cases the PHA will request family-provided verification from the agency of the member's job seeking efforts to date, and require the family to submit to the PHA any reports provided to the other agency.

In the event third-party verification is not available, the PHA will provide the family with a form on which the family member must record job search efforts. The PHA will review this information at each subsequent reexamination for which this deduction is claimed.

Furthering Education

The PHA will request third-party documentation to verify that the person permitted to further their education by the childcare is enrolled and provide information about the timing of classes for which the person is registered. The documentation may be provided by the family.

Gainful Employment

The PHA will seek third-party verification of the work schedule of the person who is permitted to work by the childcare. In cases in which two or more family members could be permitted to work, the work schedules for all relevant family members may be verified. The documentation may be provided by the family.

Allowable Type of Childcare

The type of care to be provided is determined by the family, but must fall within certain guidelines, as discussed in Chapter 6.

PHA Policy

The PHA will verify that the type of childcare selected by the family is allowable, as described in Chapter 6 (6-II.F).

The PHA will verify that the fees paid to the childcare provider cover only childcare costs (e.g., no housekeeping services or personal services) and are paid only for the care of an eligible child (e.g., prorate costs if some of the care is provided for ineligible family members).

The PHA will verify that the childcare provider is not an assisted family member.

Verification will be made through the head of household's declaration of family members who are expected to reside in the unit.

Reasonableness of Expenses

Only reasonable childcare costs can be deducted.

PHA Policy

The actual costs the family incurs will be compared with the PHA's established standards of reasonableness for the type of care in the locality to ensure that the costs are reasonable.

If the family presents a justification for costs that exceed typical costs in the area, the PHA will request additional documentation, as required, to support a determination that the higher cost is appropriate.

**EXHIBIT 7-1: SUMMARY OF DOCUMENTATION REQUIREMENTS
FOR NONCITIZENS [HCV GB, pp. 5-9 and 5-10]**

- All noncitizens claiming eligible status must sign a declaration of eligible immigrant status on a form acceptable to the PHA.
- Except for persons 62 or older, all noncitizens must sign a verification consent form
- Additional documents are required based upon the person's status.

Elderly Noncitizens

- A person 62 years of age or older who claims eligible immigration status also must provide proof of age such as birth certificate, passport, or documents showing receipt of SS old-age benefits.

All other Noncitizens

- Noncitizens that claim eligible immigration status also must present the applicable USCIS document. Acceptable USCIS documents are listed below.

• Form I-551 Alien Registration Receipt Card (for permanent resident aliens) • Form I-94 Arrival-Departure Record annotated with one of the following: • “Admitted as a Refugee Pursuant to Section 207” • “Section 208” or “Asylum” • “Section 243(h)” or “Deportation stayed by Attorney General” • “Paroled Pursuant to Section 221 (d)(5) of the USCIS”	• Form I-94 Arrival-Departure Record with no annotation accompanied by: • A final court decision granting asylum (but only if no appeal is taken); • A letter from a USCIS asylum officer granting asylum (if application is filed on or after 10/1/90) or from a USCIS district director granting asylum (application filed before 10/1/90); • A court decision granting withholding of deportation; or • A letter from an asylum officer granting withholding or deportation (if application filed on or after 10/1/90).
• Form I-688 Temporary Resident Card annotated “Section 245A” or Section 210”.	• Form I-688B Employment Authorization Card annotated “Provision of Law 274a. 12(11)” or “Provision of Law 274a.12”.

- A receipt issued by the USCIS indicating that an application for issuance of a replacement document in one of the above listed categories has been made and the applicant’s entitlement to the document has been verified; or
- Other acceptable evidence. If other documents are determined by the USCIS to constitute acceptable evidence of eligible immigration status, they will be announced by notice published in the *Federal Register*

Chapter 7. B

VERIFICATION UNDER HOTMA 102/104

[24 CFR 982.516, 24 CFR 982.551, 24 CFR 5.230, Notice PIH 2023-27]

INTRODUCTION

~~This chapter is applicable upon Prior to the PHA's HOTMA 102/104 compliance date. Prior to this, the PHA will follow policies as outlined in this chapter. Upon the PHA's HOTMA compliance date, the PHA will follow policies as outlined in Chapter 7.A of the model policy.~~

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

The PHA must verify all information that is used to establish the family's eligibility and level of assistance and is required to obtain written authorization from the family in order to collect the information. Applicants and program participants must cooperate with the verification process as a condition of receiving assistance. The PHA must not pass on the cost of verification to the family.

The PHA must follow the verification guidance provided by HUD in Notice PIH 2023-27 and any subsequent guidance issued by HUD. This chapter summarizes those requirements and provides supplementary PHA policies.

Part I describes the general verification process. Part II provides more detailed requirements related to family information. Part III provides information on income and assets, and Part IV covers mandatory deductions.

Verification policies, rules and procedures will be modified as needed to accommodate persons with disabilities. All information obtained through the verification process will be handled in accordance with the records management policies of the PHA.

PART I: GENERAL VERIFICATION REQUIREMENTS

7-I.A. FAMILY CONSENT TO RELEASE OF INFORMATION [24 CFR 982.516; 24 CFR AND 982.551; 24 CFR 5.230; and Notice PIH 2023-27]

Consent Forms

The family must supply any information that the PHA or HUD determines is necessary to the administration of the program and must consent to PHA verification of that information [24 CFR 982.551]. -All adult family members must sign consent forms as needed to collect information relevant to the family's eligibility and level of assistance. While PHAs must use form HUD-9886-A, this form does not release all the information necessary to the administration of the program. -The PHA must also develop its own release forms to cover all other necessary information.

Form HUD-9886-A [24 CFR 5.230(b)(1), b (2), (c)(4), and (c)(5); and Notice PIH 2023-27]

All adult applicants and participants sign form HUD-9886-A, Authorization for Release of Information. -All adult family members (and the head and spouse/cohead, regardless of age) are required to sign the Form HUD-9886-A at admission. -Participants, prior to January 1, 2024, signed and submitted Form HUD-9886 at each annual reexamination. HOTMA eliminated this requirement and instead required that the Form HUD-9886-A be signed only once. -On or after January 1, 2024 (regardless of the PHA's HOTMA compliance date), current program participants must sign and submit a new Form HUD-9886-A at their next interim or annual reexamination. This form will only be signed once. Another Form HUD-9886-A will not be submitted to the PHA except under the following circumstances:

- When any person 18 years or older becomes a member of the family;
- When a current member of the family turns 18; or
- As required by HUD or the PHA in administrative instructions.

The PHA has the discretion to establish policies around when family members must sign consent forms when they turn 18. -PHAs must establish these policies stating when family members will be required to sign consent forms at intervals other than at reexamination.

PHA Policy

Family members turning 18 years of age between annual recertifications will be notified in writing that they are required to sign the required Consent to the Release of Information Form HUD-9886-A within 10 business days of turning 18 years of age.

The purpose of form HUD-9886-A is to facilitate automated data collection and computer matching from specific sources and provides the family's consent only for the specific purposes listed on the form. -HUD and the PHA may collect information from State Wage Information Collection Agencies (SWICAs) and current and former employers of adult family members. -Only HUD is authorized to collect information directly from the Internal Revenue Service (IRS) and the Social Security Administration (SSA).

The PHA may obtain any financial record from any financial institution, as the terms financial record and financial institution are defined in the Right to Financial Privacy Act (12 U.S.C. 3401), whenever the PHA determines the record is needed to determine an applicant's or participant's eligibility for assistance or level of benefits [24 CFR 5.230(c)(4)].

The executed form will remain effective until the family is denied assistance, assistance is terminated, or the family provides written notification to the PHA to revoke consent.

Penalties for Failing to Consent [24 CFR 5.232]

If any family member who is required to sign a consent form fails to do so, the PHA ~~must~~ **will** deny admission to applicants and terminate assistance of participants.— The family may request an informal review (applicants) or informal hearing (participants) in accordance with PHA procedures.

However, this does not apply if the applicant, participant, or any member of their family, revokes their consent with respect to the ability of the PHA to access financial records from financial institutions, unless the PHA establishes a policy that revocation of consent to access financial records will result in denial **of admission** or termination of assistance ~~or admission~~ [24 CFR 5.232(c)]. PHAs may not process interim or annual reexaminations of income without the family's executed consent forms.

PHA Policy

The PHA has established a policy that revocation of consent to access financial records will result in denial of admission or termination of assistance in accordance with PHA policy.

In order for a family to revoke their consent, the family must provide written notice to the PHA.

Within 10 business days of the date the family provides written notice, the PHA will send the family a notice acknowledging receipt of the request and explaining that revocation of consent will result in denial or termination of assistance, as applicable. At the same time, the PHA will notify their local HUD office.

7-I.B. USE OF OTHER PROGRAMS' INCOME DETERMINATIONS [24 CFR 5.609(c)(3) and Notice PIH 2023-27]

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. PHAs are not required to accept or use determinations of income from other federal means-tested forms of assistance. If the PHA adopts a policy to accept this type of verification, the PHA must establish 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 Woman, 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 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.

PHA Policy

When available and applicable, the PHA will accept other programs' Safe Harbor determinations of income at annual reexamination to determine the family's total annual income. The PHA will still require third-party verification of all deductions such as the health and medical care expense or child care expense deductions. Further, if the family is eligible for and claims the disability assistance expense or child-care expense deductions, where applicable, the PHA will obtain third-party verification of the amount of employment income of the individual(s) enabled to work in order to cap the respective expenses as required.

Prior to using any Safe Harbor determination from another program, the PHA will ask the family if they agree with the income amounts listed. If the family disputes the income amounts on the Safe Harbor determination, the PHA will obtain third-party verification of all sources of income and assets (as applicable).

The PHA will not accept other programs' determinations of income for any new admission or interim reexamination.

With the exception of income determinations made under the Low-Income Housing Tax Credit (LIHTC) program, the PHA will accept Safe Harbor determinations from any of the programs listed above.

In order to be acceptable, the income determination must:

- Be dated within 12 months of the dates listed above;

- State the family size;

- Be for the entire family (i.e., the family members listed in the documentation 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;

The determination need not list each source of income individually. If the PHA does not receive any acceptable income determination documentation or is unable to obtain documentation, then the PHA will revert to third-party verification of income for the family.

When families present multiple verifications from the same or different acceptable Safe Harbor programs, the PHA will use the most recent income determination, unless the family presents acceptable evidence that the PHA should consider an alternative verification from a different Safe Harbor source.

When the PHA uses a Safe Harbor income determination from another program, and the family's income subsequently changes, the family is required to report the change to the PHA. Depending on when the change occurred, the change may or may not impact the PHA's calculation of the family's total annual income. -Changes that occur between the time the PHA receives the Safe Harbor documentation, and the effective date of the family's annual reexamination will not be considered. - If the family has a change in income that occurs after the annual reexamination effective date, the PHA will conduct an interim reexamination if the change meets the requirements for performing an interim reexamination as outlined in Chapter 11. -In this case, the PHA will use third-party verification to verify the change.

7-I.C. STREAMLINED INCOME DETERMINATIONS [24 CFR 960.257(c); Notice PIH 2023-27]

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

When the PHA does not use a Safe Harbor income determination from a federal assistance program to determine the family's annual income as outlined above, then PHA will use a streamlined income determinations where applicable.

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 COLA/inflationary adjustment factor to fixed-income sources.

- The family will be required to sign a self-certification stating that their sources of fixed income have not changed from the previous year.

- The PHA will document in the file how the determination that a source of income was fixed was made.

- If the family's sources of fixed income have changed from the previous year, the PHA will obtain third-party verification of any new sources of fixed income.

- All other income will be verified using third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy.

In the following circumstances, regardless of the percentage of income received from fixed sources, the PHA will obtain third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy:

- Of all assets when net family assets exceed the HUD-published threshold (\$50,000 for 2024, and \$51,600 for 2025);

- Of all deductions and allowances from annual income;

- If a family member with a fixed source of income is added;

- If verification of the COLA or rate of interest is not available;

- During the intake process and at least once every three years thereafter.

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 tables (\$50,000 for 2024, and \$51,600 for 2025);
- 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.

In order of priority, the forms of verification that the PHA will use are:

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, 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)

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.

~~Upfront Income Verification Using~~ 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 ~~or recertifications~~ 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 ~~and~~ IVT Reports

PHAs are required to obtain an EIV Income ~~and~~ IVT Report for each family any time the PHA conducts an annual reexamination. However, PHAs are not required to use the EIV Income ~~and~~ IVT Reports:

- 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 ~~and~~ IVT Reports ~~is~~ also not available for program applicants at admission.

When required to use the EIV Income Report, in order for the report to be considered current, the PHA must pull the report within 120 days of the effective date of the annual reexamination.

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.

PHA Policy

Except for when Safe Harbor verification from another means-tested federal assistance program is used to determine the family's annual income, the PHA will obtain an EIV ~~Income and IVT reports~~ Report for all annual reexaminations for all families on a monthly basis. -The PHA will ensure that all EIV Income Reports are pulled within 120 days of the effective date of the annual reexamination.

Income ~~and IVT~~ 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 ~~and IVT~~ reports will be retained in participant files with the applicable annual [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.

New Hires Report [Notice PIH 2023-27]

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.~~income.~~

PHA Policy

In accordance with PHA policies in Chapter 11, the PHA does not process interim reexaminations for families who have increases in earned income. Except for instances in which the PHA uses Safe Harbor income determinations to determine a family's annual income, the PHA will only review the New Hires Report at annual reexamination.

No Income Reported by HHS or SSA Report

This report is a tool for PHAs to identify participants who passed the SSA identity test, but no income information was reported by either 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

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 in order 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

EIV Identity Verification Report

The EIV system verifies tenant identities against SSA records. These records are compared to ~~HUD PIC~~ 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

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 ~~PIC/SSA~~ discrepancies by obtaining appropriate documentation from the participant. When the PHA determines that discrepancies exist as a result of due to PHA errors such as spelling errors or incorrect birth dates, ~~it will correct~~ the errors ~~will be corrected~~ promptly.

Deceased Tenants Reports [Notice PIH 2012-4 and Notice PIH 2023-27]

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 quarterly.

PHA Policy

The PHA will review the Deceased Tenants Report on a monthly basis.

When the Deceased Tenants Report identifies an individual as being deceased, PHAs must immediately send a letter to the head of household or emergency contact person (if the head of household is deceased and there is no other adult household member) to confirm the death of the listed household member. The PHA must notify the owner in writing of the deceased head of household.

PHAs may list the EOP as the last day of the month in which the death occurred. The landlord is entitled to receive the full HAP amount for the month in which the tenant death occurred.

PHA Policy

The PHA will list the EOP as the last day of the month in which the death occurred. The landlord is entitled to receive the full HAP amount for the month in which the tenant death occurred.

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.

Other EIV Reports [Notice PIH 2023-27]

The PHA is required to review the Multiple Subsidy Report at least quarterly and the Failed EIV Pre-Screening and Failed Verification (Failed SSA Identity Test) reports at least monthly.

Upfront Income Verification Using Non-HUD Systems

In addition to mandatory use of the EIV system, HUD encourages PHAs to utilize other upfront verification sources.

PHA Policy

The PHA will inform all applicants and participants of its use of the following UIV resources: ~~during the admission and reexamination process:~~

HUD's EIV system

- N-Focus
- Child Support
- Unemployment

7-I.F. LEVEL 4 VERIFICATION [Notice PIH 2023-27]

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

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 use an average of the last two quarters of income listed in EIV to determine income from employment. The PHA will provide the family with the information in EIV. The family will be required to sign a self-certification stating that the amount listed in EIV is accurate and representative of current income. If the family disagrees with using only the last two quarters of income listed in EIV, because of the seasonal or otherwise fluctuating nature of a particular family member's employment, the PHA will permit the family to sign a self-certification stating that the average of all four quarters of income listed in EIV is accurate and representative of current annual income and use that amount for calculating annual income. If the family disagrees and contends that the amount listed in EIV is not reflective of current income, or if less than two quarters are available in EIV, the 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.

Written Third-Party Verification from the Source [~~Notice PHH-2018-18~~]

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.

Examples of acceptable tenant-provided documents include, but are not limited to: pay stubs, payroll summary reports, employer notice or letters of hire and termination, SSA benefit verification letters, bank statements, child support payment stubs, welfare benefit letters and/or printouts, and unemployment monetary benefit notices. **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.) are an acceptable form of written, third-party verification.**

The PHA is required to obtain, at minimum, two current and consecutive pay stubs when calculating income using third-party verification from the source. For new income sources or when two pay stubs are not available, the PHA should determine income based on the information from a traditional written, third-party verification form or the best available information.

When the family disputes EIV-reported employment income, the PHA uses written third-party verification.

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.

PHA Policy

In general, the PHA will use third-party verification from the source in the following circumstances:

- At annual reexamination when EIV + self-certification is not used;

- For all new admissions; and

- For all interim reexaminations.

The PHA will not use this method if the PHA is able to use an income determination from a means-tested federal assistance program or if the PHA uses EIV + self-certification as outlined above.

In general, third-party documents provided by the family or the source must be dated within 120 days of the date received by the PHA. However, for fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation.

The PHA may reject documentation provided by the family if the document is not an original, if the document appears to be forged, or if the document is altered, mutilated, or illegible. If the PHA determines that third-party documents provided by the family are not acceptable, the PHA will explain the reason to the family and request additional documentation from the family or will use a lower form of verification such as a written third-party verification form.

When verification of assets held by a banking or financial institution is required, the PHA will obtain one statement that reflects the current balance of the account.

When pay stubs are used, the PHA will require the family to provide the two most current, consecutive pay stubs. At the PHA's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income, fluctuating schedule, etc.), the PHA may request additional paystubs or a payroll record.

7-I.G. LEVEL 3 VERIFICATION: WRITTEN, THIRD-PARTY FORM [Notice PIH 2023 -27]

This type of ~~When-upfront~~ verification is a form developed by ~~not available and the family is unable to provide written third-party documents~~, the PHA and used uniformly for all families when needed to collect information from a ~~written~~ third-party source. This ~~verification form. HUD's position is known as "that this traditional third-party verification."~~ method ~~presents administrative burdens and risks which may be reduced through the use of family-provided third-party documents.~~

PHAs send a PHA-developed ~~may mail, fax, or email third-party written verification form requests to third-party sources.~~

The PHA will send third-party verification forms 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 ~~Third-party verification forms will be sent when third-party verification documents 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

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 2018-18]

For third-party oral verification, PHAs contact sources, identified by UIV techniques or by the family, by telephone or in person.

~~Oral third-party verification is mandatory if neither form of written third-party verification is available.~~

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 should~~ 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 ~~oral~~ verification via a form and the source did not respond and move directly to self-certification.

PHA Policy

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 ~~family's~~ file the ~~date and time~~ of the telephone call or visit, the name ~~and title~~ of the person contacted and the telephone number, as well as the ~~information confirmed~~.

~~When any source responds verbally to the initial written request for verification the PHA will accept the verbal response as oral verification but will also request that the source complete and return any verification forms that were provided.~~

When Third-Party Verification is Not Required [Notice PIH 2023-27]

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

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.

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

Third-party verification is not required when legal documents are the primary source, such as a birth certificate or other legal documentation of birth.

7-I.I. LEVEL 1: NON-THIRD-PARTY VERIFICATION TECHNIQUE: SELF-CERTIFICATION [Notice PIH 2023-27]

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 ~~is unable to obtain third-party verification.~~

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 (\$50,000 for 2024, and \$51,600 for 2025) ~~50,000 or less~~ 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 ~~annual recertifications~~ 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 a tenant declaration for verification of income, assets, or expenses,~~ 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.

PHA Policy

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 not 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 must be signed in the presence of a PHA representative or PHA notary public.~~

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).”

PART II: VERIFYING FAMILY INFORMATION

7-II.A. VERIFICATION OF LEGAL IDENTITY

PHA Policy

The PHA will require families to furnish verification of legal identity for each household member.

Verification of Legal Identity for Adults	Verification of Legal Identity for Children
Certificate of birth, naturalization papers Church issued baptismal certificate Current, valid driver's license or Department of Motor Vehicles identification card Current temporary driver's license or Department of Motor Vehicles identification card without photo U.S. military discharge (DD 214) Current U.S. passport Current Federal or State ID with a photo Current government employer identification card with picture	Certificate of birth Adoption papers Custody agreement Health and Human Services ID Certified school records

If a document submitted by a family is illegible for any reason or otherwise questionable, more than one of these documents may be required.

If none of these documents can be provided and at the PHA's discretion, a third party who knows the person may attest to the person's identity. The certification must be provided in a format acceptable to the PHA and must be signed by the family member whose information or status is being verified.

Persons who are homeless can provide identification from a social worker or homeless shelter coordinator.

The certification must be provided in a format acceptable to OHA and be signed in the presence of a PHA representative or PHA notary public.

Legal identity will be verified for all applicants at the time of application and 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.B. SOCIAL SECURITY NUMBERS [24 CFR 5.216, Notice PIH ~~2023-27-2018-24~~]

The family must provide documentation of a valid ~~Social Security~~ ~~social-security~~ number (SSN) for each member of the household, with the exception of individuals who do not contend eligible immigration status. Exemptions also include existing program participants who were at least 62 years of age as of January 31, 2010, and had not previously disclosed an SSN.

Note that an individual who previously declared to have eligible immigration status may not change their declaration for the purpose of avoiding compliance with the SSN disclosure and documentation requirements or penalties associated with noncompliance with these requirements. Nor may the head of household opt to remove a household member from the family composition for this purpose.

The PHA must accept the following documentation as acceptable evidence of the social security number:

- An original SSN card issued by the Social Security Administration (SSA)
- An original SSA-issued document, which contains the name and SSN of the individual
- An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual

While PHAs must attempt to gather third-party verification of SSNs prior to admission as listed above, PHAs also have the option of accepting a self-certification and a third-party document (such as a bank statement, utility or cell phone bill, or benefit letter) with the applicant's name printed on it to satisfy the SSN disclosure requirement if the PHA has exhausted all other attempts to obtain the required documentation. If verifying an individual's SSN using this method, the PHA must document why the other SSN documentation was not available. ~~[Notice PIH 2023-27].~~

If the tenant's SSN becomes verified in EIV, then no further verification is required. If the tenant's SSN fails the SSA identity match, then the PHA must obtain a valid SSN card issued by the SSA or an original document issued by a federal or state government agency that contains the name of the individual and the SSN of the individual, along with other identifying information of the individual. The tenant's assistance must be terminated if they fail to provide the required documentation.

PHA Policy

The PHA will verify an individual's SSN in the situations described above using the method described above as a last resort when no other forms of verification of the individual's SSN are available.

The PHA may only reject documentation of an SSN provided by an applicant or participant if the document is not an original document or if the original document has been altered, mutilated, is illegible, or appears to be forged.

PHA Policy

The PHA will explain to the applicant or participant the reasons the document is not acceptable and request that the individual obtain and submit acceptable documentation of the SSN to the PHA within 90 days.

In the case of Moderate Rehabilitation Single Room Occupancy (SRO) individuals, the required documentation must be provided within 90 calendar days from the date of admission into the program. The PHA must grant one additional 90-day extension if it determines that the applicant's failure to comply was due to circumstances that were beyond the applicant's control and could not have been reasonably foreseen.

PHA Policy

The PHA will grant one additional 90-day extension if needed for reasons beyond the participant's control such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency. If the individual fails to comply with SSN disclosure and documentation requirements upon expiration of the provided time period, the PHA will terminate the individual's assistance.

If an applicant family includes a child under 6 years of age who joined the household within the 6 months prior to the date of voucher issuance, an otherwise eligible family may be admitted to the program and the family must provide documentation of the child's SSN within 90 days of the effective date of the initial HAP contract. A 90-day extension will be granted if the PHA determines that the participant's failure to comply was due to unforeseen circumstances and was outside of the participant's control.

PHA Policy

The PHA will grant one additional 90-day extension if needed for reasons beyond the applicant's control, such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.

When a participant requests to add a new household member who is at least 6 years of age, or who is under the age of 6 and has an SSN, the participant must provide the complete and accurate SSN assigned to each new member at the time of reexamination or recertification, in addition to the documentation required to verify it. The PHA may not add the new household member until such documentation is provided.

When a participant requests to add a new household member who is under the age of 6 and has not been assigned an SSN, the participant must provide the SSN assigned to each new child and the required documentation within 90 calendar days of the child being added to the household. A 90-day extension will be granted if the PHA determines that the participant's failure to comply was due to unforeseen circumstances and was outside of the participant's control. During the period the PHA is awaiting documentation of the SSN, the child will be counted as part of the assisted household.

PHA Policy

The PHA will grant one additional 90-day extension if needed for reasons beyond the participant's control such as delayed processing of the SSN application by the SSA, natural disaster, fire, death in the family, or other emergency.

Social security numbers must be verified only once during continuously assisted occupancy.

PHA Policy

The PHA will verify each disclosed SSN by:

Obtaining documentation from applicants and participants that is acceptable as evidence of social security numbers

Making a copy of the original documentation submitted, returning it to the individual, and retaining a copy in the file folder

Once the individual's verification status is classified as "verified," the PHA may, at its discretion, remove and destroy copies of documentation accepted as evidence of social security numbers. The retention of the EIV Summary Report or Income Report is adequate documentation of an individual's SSN.

PHA Policy

Once an individual's status is classified as "verified" in HUD's EIV system, the PHA will not remove and destroy copies of documentation accepted as evidence of social security numbers.

7-II.C. DOCUMENTATION OF AGE

A birth certificate or other official record of birth is the preferred form of age verification for all family members. For elderly family members an original document that provides evidence of the receipt of social security retirement benefits is acceptable.

PHA Policy

If an official record of birth or evidence of social security retirement benefits cannot be provided, the PHA will require the family to submit other documents that support the reported age of the family member (e.g., school records, driver's license if birth year is recorded) and to provide a self-certification.

Age must be verified only once during continuously -assisted occupancy.

7-II.D. FAMILY RELATIONSHIPS

Applicants and program participants are required to identify the relationship of each household member to the head of household. Definitions of the primary household relationships are provided in the Eligibility chapter.

PHA Policy

Family relationships are verified only to the extent necessary to determine a family's eligibility and level of assistance. Certification by the head of household normally is sufficient verification of family relationships.

Marriage

PHA Policy

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a marital relationship, the PHA will require the family to document the marriage.

A marriage certificate generally is required to verify that a couple is married.

In the case of a common law marriage, the couple must demonstrate that they hold themselves to be married (e.g., by telling the community they are married, calling each other husband and wife, using the same last name, filing joint income tax returns).

Separation or Divorce

PHA Policy

Certification by the head of household is normally sufficient verification. If the PHA has reasonable doubts about a separation or divorce, the PHA will require the family to provide documentation of the divorce or separation.

A certified copy of a divorce decree, signed by a court officer, is required to document that a couple is divorced.

A copy of a court-ordered maintenance or other court record is required to document a separation.

If no court document is available, documentation from a community-based agency will be accepted.

Absence of Adult Member

PHA Policy

If an adult member who was formerly a member of the household is reported to be permanently absent, the family must provide evidence to support that the person is no longer a member of the family (e.g., documentation of another address at which the person resides such as a lease or utility bill), if the PHA so requests.

Foster Children and Foster Adults

PHA Policy

Third-party verification from the state or local government agency responsible for the placement of the individual with the family is required.

7-II.E. VERIFICATION OF STUDENT STATUS

General Requirements

PHA Policy

The PHA requires families to provide information about the student status of all students who are 18 years of age or older. This information will be verified only if:

The family reports full-time student status for an adult other than the head, spouse, or cohead.

The family reports child-care expenses to enable a family member to further their education.

The family includes a student enrolled in an *institution of higher education*.

Restrictions on Assistance to Students Enrolled in Institutions of Higher Education

This section applies only to students who are seeking assistance on their own, separately from their parents. It does not apply to students residing with parents who are seeking or receiving HCV assistance.

PHA Policy

In accordance with the verification hierarchy described in section 7-~~II~~.B, the PHA will determine whether the student is exempt from the restrictions in 24 CFR 5.612 by verifying any one of the following exemption criteria:

The student is enrolled at an educational institution that does not meet the definition of *institution of higher education* in the Higher Education Act of 1965 (see section Exhibit 3-2).

The student is at least 24 years old.

The student is a veteran, as defined in section 3-II.E.

The student is married.

The student has at least one dependent child, as defined in section 3-II.E.

The student is a person with disabilities, as defined in section 3-II.E, and was receiving assistance prior to November 30, 2005.

If the PHA cannot verify at least one of these exemption criteria, the PHA will conclude that the student is subject to the restrictions on assistance at 24 CFR 5.612. In addition to verifying the student's income eligibility, the PHA will then proceed to verify either the student's parents' income eligibility (see section 7-III.~~J~~ M) or the student's independence from their parents (see below).

Independent Student

PHA Policy

The PHA will verify a student's independence from their parents to determine that the student's parents' income is not relevant for determining the student's eligibility by doing all of the following:

Either reviewing and verifying previous address information to determine whether the student has established a household separate from their parents for at least one year, or reviewing and verifying documentation relevant to determining

whether the student meets the U.S. Department of Education's definition of *independent student* (see section 3-II.E)

Reviewing the student's prior year income tax returns to verify the student is

independent or verifying the student meets the U.S. Department of Education's definition of *independent student* (see section 3-II.E)

Requesting and obtaining written certification directly from the student's parents identifying the amount of support they will be providing to the student, even if the amount of support is \$0, except in cases in which the PHA determines that the student is a *vulnerable youth* (see section 3-II.E)

7-II.F. DOCUMENTATION OF DISABILITY

The PHA must verify the existence of a disability in order to allow certain income disallowances and deductions from income. The PHA is not permitted to inquire about the nature or extent of a person's disability [24 CFR 100.202(c)]. The PHA may not inquire about a person's diagnosis or details of treatment for a disability or medical condition. If the PHA receives a verification document that provides such information, the PHA will not place this information in the tenant file. Under no circumstances will the PHA request a participant's medical record(s). For more information on health care privacy laws, see the Department of Health and Human Services' website at <http://www.hhs.gov/ocr/privacy/>.

The above cited regulation does not prohibit the following inquiries, provided these inquiries are made of all applicants, whether or not they are persons with disabilities [VG, p. 24]:

- Inquiry into an applicant's ability to meet the requirements of ownership or tenancy
- Inquiry to determine whether an applicant is qualified for a dwelling available only to persons with disabilities or to persons with a particular type of disability
- Inquiry to determine whether an applicant for a dwelling is qualified for a priority available to persons with disabilities or to persons with a particular type of disability
- Inquiring whether an applicant for a dwelling is a current illegal abuser or addict of a controlled substance
- Inquiring whether an applicant has been convicted of the illegal manufacture or distribution of a controlled substance

Family Members Receiving SSA Disability Benefits

Verification of the receipt of disability benefits from the Social Security Administration (SSA) is sufficient verification of disability for the purpose of qualifying for waiting list preferences (if applicable) or certain income disallowances and deductions [VG, p. 23].

PHA Policy

For family members claiming disability who receive disability benefits from the SSA, the PHA will attempt to obtain information about disability benefits through the HUD Enterprise Income Verification (EIV) system. If documentation from HUD's EIV System is not available, the PHA will request a current (dated within the ~~last 60 days~~ appropriate benefit year ~~last 60 days~~) SSA benefit verification letter from each family member claiming disability status. If the family is unable to provide the document(s), the PHA will ask the family to request a benefit verification letter by either calling SSA at 1-800-772-1213, or by requesting it from www.ssa.gov. Once the applicant or participant receives the benefit verification letter, they will be required to provide it to the PHA.

Family Members Not Receiving SSA Disability Benefits

Receipt of veteran's disability benefits, worker's compensation, or other non-SSA benefits based on the individual's claimed disability are not sufficient verification that the individual meets HUD's definition of disability in 24 CFR 5.403.

PHA Policy

For family members claiming disability who do not receive disability benefits from the SSA, a knowledgeable professional must provide third-party verification that the family member meets the HUD definition of disability. See the Eligibility chapter for the HUD definition of disability. The knowledgeable professional will verify whether the family member does or does not meet the HUD definition.

7-II.G. CITIZENSHIP OR ELIGIBLE IMMIGRATION STATUS [24 CFR 5.508]

Overview

Housing assistance is not available to persons who are not citizens, nationals, or eligible immigrants. Prorated assistance is provided for "mixed families" containing both eligible and ineligible persons. A detailed discussion of eligibility requirements is in the Eligibility chapter. This verifications chapter discusses HUD and PHA verification requirements related to citizenship status.

The family must provide a certification that identifies each family member as a U.S. citizen, a U.S. national, an eligible noncitizen or an ineligible noncitizen and submit the documents discussed below for each family member. Once eligibility to receive assistance has been verified for an individual it need not be collected or verified again during continuously assisted occupancy. [24 CFR 5.508(g)(5)]

U.S. Citizens and Nationals

HUD requires a declaration for each family member who claims to be a U.S. citizen or national. The declaration must be signed personally by any family member 18 or older and by a guardian for minors.

The PHA may request verification of the declaration by requiring presentation of a birth certificate, United States passport or other appropriate documentation.

PHA Policy

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

Documents Required

All family members claiming eligible immigration status must declare their status in the same manner as U.S. citizens and nationals.

The documentation required for eligible noncitizens varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, age, and the date on which the family began receiving HUD-funded assistance. Exhibit 7-1 at the end of this chapter summarizes documents family members must provide.

PHA Verification [HCV GB, pp. 5-3 and 5-7]

For family members age 62 or older who claim to be eligible immigrants, proof of age is required in the manner described in 7-II.C. of this plan. No further verification of eligible immigration status is required.

For family members under the age of 62 who claim to be eligible immigrants, 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.

7-II.H. VERIFICATION OF PREFERENCE STATUS

The PHA must verify any preferences claimed by an applicant that determined placement on the waiting list.

PHA Policy

The PHA will offer a preference to any family that has been terminated from its HCV program due to insufficient program funding. The PHA will verify this preference using the PHA's termination records.

The PHA also offers a preference for victims of domestic violence, dating violence, sexual assault, ~~or~~ stalking, **or human trafficking**, as described in Section 4-III.C. To verify that applicants qualify for the preference, the PHA will follow documentation requirements outlined in Section 16-IX.D.

PART III: VERIFYING INCOME AND ASSETS

Chapter 6 of this plan describes in detail the types of income that are included and excluded and how assets and income from assets are handled. Any income reported by the family must be verified. This part provides PHA policies that supplement the general verification procedures specified in Part I of this chapter.

PHA Policy

The following policies do not apply when the PHA uses a Safe Harbor income determination from a means-tested federal assistance program.

7-III.A. EARNED INCOME

Tips

PHA Policy

Unless tip income is included in a family member's W-2 by the employer or in UIV verification sources, persons who work in industries where tips are standard will be required to sign a certified estimate of tips received for the prior year or tips anticipated to be received in the coming year.

Wages

PHA Policy

When the PHA requires third-party verification of wages, for wages other than tips, the family must provide originals of the two most current, consecutive pay stubs.

7-III.B. BUSINESS AND SELF EMPLOYMENT INCOME

The PHA must obtain written, third-party verification when the income type is not available in EIV. This includes income from self-employment.

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.).~~

~~An audited financial statement for the previous fiscal year if an audit was conducted. If an audit was not conducted, a statement of income and expenses must be submitted and the business owner or self-employed person must certify to its accuracy.~~

~~All schedules completed for filing federal and local taxes in the preceding year.~~

If accelerated depreciation was used on the tax return or financial statement, an accountant's calculation of depreciation expense, computed using straight-line depreciation rules.

~~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.

The PHA will provide a format for any person who is unable to provide such a statement to record income and expenses for the coming year. The business owner/self-employed person will be required to submit the information requested and to certify to its accuracy at all future reexaminations.

At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.

If a family member has been self-employed less than three (3) months, the PHA will accept the family member's certified estimate of income and schedule an interim reexamination in three (3) months. If the family member has been self-employed for three (3) to twelve (12) months the PHA will require the family to provide documentation of income and expenses for this period and use that information to project income.

7-III.C. PERIODIC PAYMENTS AND PAYMENTS IN LIEU OF EARNINGS

For policies governing streamlined income determinations for fixed sources of income, please see Chapter 11.

Social Security/SSI Benefits [Notice PIH 2023-27]

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 ~~-, OHA will request a~~ current SS and/or SSI benefit letter (dated within the ~~last 120 calendar days appropriate~~ ~~last 60 days~~ ~~SSA benefit year~~) for ~~verification letter from~~ each family member that receives SS and/or SSI ~~social security~~ benefits. If the family is unable to provide the document or documents, the PHA should ~~(s), OHA will help~~ ~~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 from the applicant, make a photocopy of the document for the file, and return the original to the family.

~~For Once the applicant has received the benefit verification letter they will be required to provide it to OHA.~~

- ~~To verify the SS/SSI benefits of~~ participants, the PHA must ~~OHA will~~ obtain information ~~about social security/SSI benefits~~ 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 ~~HUD systems, OHA will~~ request a current SSA benefit verification letter (dated within the ~~last 120 calendar days appropriate~~ ~~benefit year~~) from each family member that receives SS and/or SSI ~~social security~~ benefits. If the family is unable to provide the document or documents, the PHA should ~~help (s), OHA will 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.

7-III.D. ALIMONY OR 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 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

~~The methods the PHA will use to verify alimony and child support payments differ depending on whether the family declares that it receives regular payments.~~

~~OHA will review child support website records to determine if applicants and participant families receive child support payments.~~

~~If the family declares that it *receives regular payments*,~~ Verification will be obtained in the following order of priority:

Copies of the receipts and/or payment stubs for the ~~12 months~~ **60 days** 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

~~If the family declares that it *receives irregular or no payments*, in addition to the verification process listed above, the family must provide evidence that it has taken all reasonable efforts to collect amounts due. This may include:~~

~~A statement from any agency responsible for enforcing payment that shows the family has requested enforcement and is cooperating with all enforcement efforts~~

~~If the family has made independent efforts at collection, a written statement from the attorney or other collection entity that has assisted the family in these efforts~~

Note: Families are not required to undertake independent enforcement action.

7-III.E. NONRECURRING INCOME [Notice PIH 2023-27]

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

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]

At admission and reexam, for families with net assets ~~totaling \$50,000 or less~~ less than or equal to the HUD-published threshold listed in HUD's current year Inflation-Adjusted Values tables (~~adjusted annually \$50,000 for 2024, \$51,600 for 2025~~), the PHA may, but is not required to, accept the family's self-certification that the family's assets do not exceed ~~\$50,000~~ 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 excluded from the calculation of net family assets (because the combined value of non-necessary personal property does not exceed ~~\$50,000~~ 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 value over ~~\$50,000~~ 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 ~~\$50,000~~ 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.

For families with net assets ~~totaling \$50,000 or less~~ less than or equal to the HUD-published threshold listed in the current year's Inflation-Adjusted Values tables, the PHA will accept the family's self-certification of the value of family assets and anticipated asset income. The family's declaration must show the total amount of income expected from all assets. ~~The family's declaration must show each asset and the amount of income expected from that asset.~~ All family members 18 years of age and older must sign the family's declaration. The PHA reserves the right to require additional verification in situations where the accuracy of the declaration is in question. Any income the family expects to receive from assets will be included in the family's annual income. The family will be required to provide third-party verification of net family assets every three years.

When verification is required, 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]

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 and 12. ~~At admission and reexam, the PHA may accept a self-certification from the family stating that the family does not have any present ownership in any real property that is suitable for occupancy. 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

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. ~~Both at admission and reexam, the PHA will accept self-certification from the family that the family does not have any present ownership in any real property. The certification will state that the family does not have any present ownership interest in any real property and 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 a 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 confidentiality requirements under 24 CFR 5.2007 and will accept a self-certification.

~~7-III.G. ASSETS DISPOSED OF FOR LESS THAN FAIR MARKET VALUE~~

~~The family must certify whether any assets have been disposed of for less than fair market value in the preceding two years. 5-28]. The PHA needs to verify only those certifications that warrant documentation [HCV GB, p. 5-28].~~

PHA Policy

~~The PHA will accept a self-certification from a family as verification of assets disposed of for less than fair market value.~~

~~The PHA will verify the value of assets disposed of only if:~~

~~The PHA does not already have a reasonable estimation of its value from previously collected information, or~~

~~The amount reported by the family in the certification appears obviously in error.~~

~~Example 1: An elderly participant reported a \$10,000 certificate of deposit at the last annual reexamination and the PHA verified this amount. Now the person reports that theyshe have she has given this \$10,000 to their her son. The PHA has a reasonable estimate of the value of the asset; therefore, reverification of the value of the asset is not necessary.~~

~~Example 2: A family member has disposed of its 1/4 share of real property located in a desirable area and has valued their her share at approximately \$5,000. Based upon market conditions, this declaration does not seem realistic. Therefore, the PHA will verify the value of this asset.~~

7-III.GH. NET INCOME FROM RENTAL PROPERTY

PHA Policy

The family must provide:

A current executed lease for the property that shows the rental amount or certification from the current tenant

A self-certification from the family members engaged in the rental of property providing an estimate of expenses for the coming year and the most recent IRS Form 1040 with Schedule E (Rental Income).

If schedule E was not prepared, the PHA will require the family members involved in the rental of property to provide a self-certification of income and expenses for the previous year and may request documentation to support the statement including: tax statements, insurance invoices, bills for reasonable maintenance and utilities, and bank statements or amortization schedules showing monthly interest expense.

7-III.H. FEDERAL TAX REFUNDS OR REFUNDABLE TAX CREDITS [Notice PIH 2023-27]

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) equal to or below \$50,000 (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 \$50,000 the HUD-published threshold.

7-III.J. RETIREMENT ACCOUNTS

PHA Policy

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.

~~written third-party documents supplied by the family as evidence of the status of retirement accounts.~~

~~The type of original document that will be accepted depends upon the family member's retirement status.~~

7-III.KJ. INCOME FROM EXCLUDED SOURCES [Notice PIH 2023-27]

A detailed discussion of excluded income is provided in Chapter 6, Part I.

HUD guidance on verification of excluded income draws a distinction between income which is fully excluded and income which is only partially excluded.

For fully excluded income, the PHA is **not** required to follow the verification hierarchy, **For fully excluded income, the PHA is not required to** document why third-party verification is not available, or report the income on the 50058. *Fully excluded income* is defined as income **where the entire amount qualifies to be excluded from the annual income determination in accordance with 24 CFR 5.609(b) and any Federal Register notice on mandatory exclusions issued by HUD** (for example, food stamps, earned income of a minor, or foster care funds) ~~[Notice PIH 2013-04].~~

PHAs may accept a family's signed application or reexamination form as self-certification of fully excluded income. They do not have to require additional documentation. However, if there is any doubt that a source of income qualifies for full exclusion, PHAs have the option of requiring additional verification.

For partially excluded income, the PHA **is** required to follow the verification hierarchy and all applicable regulations, and to report the income on the 50058. Partially excluded income is defined as income where only a certain portion of what is reported by the family qualifies to be excluded and the remainder is included in annual income (for example, the income of an adult full-time student, ~~or income excluded under the earned income disallowance).~~

PHA Policy

The PHA will accept the family's self-certification as verification of fully excluded income. The PHA may request additional documentation if necessary to document the income source.

The PHA will verify the source and amount of partially excluded income as described in Part 1 of this chapter.

7-III.LK1. ZERO ANNUAL INCOME STATUS REVIEWS FAMILIES [Notice PIH 2023-27]

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.

~~A zero-income review is an assessment, sometimes periodic, performed by the PHA of the income of a family who claims that they do not receive income from any source, including from assets. During such reviews, it is common for PHAs to request that families complete and sign a worksheet explaining how they pay for the household's expenses. HUD does not require PHAs to conduct periodic zero income reviews. 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

The PHA will check UIV sources and/or may request information from third-party sources to verify that certain forms of income such as unemployment benefits, TANF, SS, SSI, earned income, child support, etc., ~~and earnings~~ are not being received by families claiming to have zero annual income.

The PHA will 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 conduct interims in accordance with PHA policy in Chapter 11.~~

The PHA will only conduct interims in accordance with PHA policy in Chapter 11.

7-III.MLJ. STUDENT FINANCIAL ASSISTANCE [24 CFR 5.609(b)(9)]

The regulations under HOTMA distinguish between two categories of student ~~Any~~ financial assistance paid to both full-time and part-time students. ~~Any assistance to students under section 479B of , in excess of amounts received for tuition, fees, and other required charges that a person attending an institution of higher education receives under the Higher Education Act of 1965 (Title IV of the HEA) must be ,~~ from private sources, or from an institution of higher education must be considered income unless the student is over the age of 23 with dependent children or is residing with parents who are seeking or receiving HCV assistance [24 CFR 5.609(b)(9) and FR 4/10/06].

~~For students over the age of 23 with dependent children or students residing with parents who are seeking or receiving HCV assistance, the full amount of student financial assistance is excluded from the family's annual income [24 CFR 5.609(c)(6)]. The full amount of student financial assistance is also excluded for students attending schools that do not qualify as institutions of higher education (as defined in Exhibit 3-2). Excluded amounts are verified only if, without verification, the PHA would not be able to determine whether or to what extent the income is to be excluded (see section 7-III.H).~~

Any other grant-in-aid, scholarship, or other assistance amounts an individual receives for the actual covered costs charged by the institute of higher education not otherwise excluded by the federally mandated income exclusions are included ~~excluded~~ For a student subject to having a portion of their student financial assistance included in annual income in accordance with 24 CFR 5.609(b)(9)(ii).

PHA Policy

The PHA will request written third-party verification of both the source and the **amount of student financial assistance**. Family-provided documents from the educational institution attended by the student will be requested, as well as documents generated by any other person or entity providing such assistance, as reported by the student.

In addition, ~~unless the student's only source of assistance is assistance under Title IV of the HEA, the PHA will request written verification of the~~ **cost of the student's tuition, books, supplies, room and board fees, and other required fees and charges to the student from the educational institution.**

If the PHA is unable to obtain third-party written verification of the requested information, the PHA will pursue other forms of verification following the verification hierarchy in section 7-I.B.

7-III.M. PARENTAL INCOME OF STUDENTS SUBJECT TO ELIGIBILITY RESTRICTIONS

If a student enrolled at an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the income of the student's parents must be considered when determining income eligibility, unless the student is determined independent from their parents or a *vulnerable youth* in accordance with PHA policy [24 CFR 5.612, FR _Notice 4/10/06, p. _18146, and FR _Notice 9/21/16].

This provision does not apply to students residing with parents who are seeking or receiving HCV assistance. It is limited to students who are seeking or receiving assistance on their own, separately from their parents.

PHA Policy

If the PHA is required to determine the income eligibility of a student's parents, the PHA will request an income declaration and certification of income from the appropriate parent(s) (as determined in section 3-II.E). The PHA will send the request directly to the parents, who will be required to certify to their income under penalty of perjury. The parents will be required to submit the information directly to the PHA. The required information must be submitted (postmarked) within 10 business days of the date of the PHA's request or within any extended timeframe approved by the PHA.

The PHA reserves the right to request and review supporting documentation at any time if it questions the declaration or certification. Supporting documentation may include, but is not limited to, Internal Revenue Service (IRS) tax returns, consecutive and original pay stubs, bank statements, pension benefit statements, benefit award letters, and other official and authentic documents from a federal, state, or local agency.

PART IV: VERIFYING MANDATORY DEDUCTIONS

7-IV.A. DEPENDENT AND ELDERLY/DISABLED HOUSEHOLD DEDUCTIONS

The dependent and elderly/disabled family deductions require only that the PHA verify that the family members identified as dependents or elderly/disabled persons meet the statutory definitions. No further verifications are required.

Dependent Deduction

See Chapter 6 (~~6-II.B.~~) for a full discussion of this deduction. The PHA must verify that:

- Any person under the age of 18 for whom the dependent deduction is claimed is not the head, spouse, or cohead of the family and is not a foster child
- Any person age 18 or older for whom the dependent deduction is claimed is not a foster adult or live-in aide, and is a person with a disability or a full time student

Elderly/Disabled Family Deduction

See Eligibility chapter for a definition of elderly and disabled families and Chapter 6 (~~6-II.C.~~) for a discussion of the deduction. The PHA must verify that the head, spouse, or cohead is 62 years of age or older or a person with disabilities.

7-IV.B. **HEALTH AND MEDICAL CARE EXPENSE DEDUCTION**

Policies related to medical expenses are found in **Chapter 6 -H.D.** 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

Medical 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 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 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].

In addition, the PHA must verify that:

- The household is eligible for the deduction.
- The costs to be deducted are qualified **health and** medical **care** expenses.
- The expenses are not paid for or reimbursed by any other source.
- Costs incurred in past years are counted only once.

Eligible Household

The **health and medical care expense** deduction is permitted only for households in which the head, spouse, or cohead is at least 62, or a person with disabilities. The PHA must verify that the family meets the definition of an elderly or disabled family provided in the Eligibility chapter and as described in Chapter 7 (7-IV.A.) of this plan.

Qualified Expenses

- To be eligible for the **health and medical care expense** deduction, the costs must qualify as medical expenses. See Chapter 6 (~~6-II.D.~~) for the PHA's policy on what counts as a medical expense.

Unreimbursed Expenses

To be eligible for the **health and medical care expense expenses** deduction, the costs must not be reimbursed by another source.

PHA Policy

The family will be required to certify that the medical expenses are not paid or reimbursed to the family from any source. If expenses are verified through a third party, the third party must certify that the expenses are not paid or reimbursed from any other source.

Expenses Incurred in Past Years

PHA Policy

At new admission and interim reexam, when ~~When~~ anticipated costs are related to on-going payment of medical bills incurred in past years, the PHA will verify:

The anticipated repayment schedule

- ——— The amounts paid in the past, and

- Whether the amounts to be repaid have been deducted from the family's annual income in past years

7-IV.C. DISABILITY ASSISTANCE EXPENSES

Policies related to disability assistance expenses are found in 6-II.E. 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 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

Attendant Care

PHA Policy

~~The PHA will accept written third-party documents provided by the family.~~

~~If family-provided documents are not available, the PHA will provide a third-party verification form directly to the care provider requesting the needed information.~~

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.~~

~~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 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

Expenses for auxiliary apparatus will be verified through:

Written third-party documents provided by the family, such as billing statements for purchase of auxiliary apparatus, or other evidence of monthly payments or total payments that will be due for the apparatus during the upcoming 12 months.

Third-party verification form signed by the provider, if family-provided documents are not available.

If third-party verification is not possible, written family certification of estimated apparatus costs for the upcoming 12 months.

In addition, the PHA must verify that:

- The family member for whom the expense is incurred is a person with disabilities (as described in 7-II.F above).
- The expense permits a family member, or members, to work (as described in **Chapter 6-II.E.**).
- The expense is not reimbursed from another source (as described in Chapter 6-~~II.E.~~).

Family Member is a Person with Disabilities

To be eligible for the disability assistance expense deduction, the costs must be incurred for attendant care or auxiliary apparatus expense associated with a person with disabilities. The PHA will verify that the expense is incurred for a person with disabilities (See 7-II.F.).

Family Member(s) Permitted to Work

The PHA must verify that the expenses claimed actually enable a family member, or members, (including the person with disabilities) to work.

PHA Policy

The PHA will request third-party verification from a rehabilitation agency or knowledgeable medical professional indicating that the person with disabilities requires attendant care or an auxiliary apparatus to be employed, or that the attendant care or auxiliary apparatus enables another family member, or members, to work (See 6-II.E.). This documentation may be provided by the family.

If third-party verification has been attempted and is either unavailable or proves unsuccessful, the family must certify that the disability assistance expense frees a family member, or members (possibly including the family member receiving the assistance), to work.

Unreimbursed Expenses

To be eligible for the disability expenses deduction, the costs must not be reimbursed by another source.

PHA Policy

The family will be required to certify that attendant care or auxiliary apparatus expenses are not paid by or reimbursed to the family from any source.

7-IV.D. CHILD-CARE EXPENSES

Policies related to childcare expenses are found in Chapter 6 (~~6-II.F~~). The amount of the deduction will be verified following the standard verification procedures described in Part I of this chapter. In addition, the PHA must verify that:

- The child is eligible for care (12 or younger).
- The costs claimed are not reimbursed.
- The costs enable a family member to work, actively seek work, or further their education.
- The costs are for an allowable type of childcare.
- The costs are reasonable.

Eligible Child

To be eligible for the childcare deduction, the costs must be incurred for the care of a child under the age of 13. The PHA will verify that the child being cared for (including foster children) is under the age of 13 (See 7-II.C.).

Unreimbursed Expense

To be eligible for the childcare deduction, the costs must not be reimbursed by another source.

PHA Policy

The family (and the care provider) will be required to certify that the childcare expenses are not paid or reimbursed to the family from any source.

Pursuing an Eligible Activity

The PHA must verify that the family member(s) that the family has identified as being enabled to seek work, pursue education, or be gainfully employed, are actually pursuing those activities.

PHA Policy

Information to be Gathered

The PHA will verify information about how the schedule for the claimed activity relates to the hours of care provided, the time required for transportation, the time required for study (for students), the relationship of the family member(s) to the child, and any special needs of the child that might help determine which family member is enabled to pursue an eligible activity.

Seeking Work

Whenever possible the PHA will use documentation from a state or local agency that monitors work-related requirements (e.g., welfare or unemployment). In such cases the PHA will request family-provided verification from the agency of the member's job seeking efforts to date, and require the family to submit to the PHA any reports provided to the other agency.

In the event third-party verification is not available, the PHA will provide the family with a form on which the family member must record job search efforts. The PHA will review this information at each subsequent reexamination for which this deduction is claimed.

Allowable Type of Childcare

The type of care to be provided is determined by the family, but must fall within certain guidelines, as discussed in Chapter 6.

PHA Policy

The PHA will verify that the type of childcare selected by the family is allowable, as described in Chapter 6.

The PHA will verify that the fees paid to the childcare provider cover only childcare costs (e.g., no housekeeping services or personal services) and are paid only for the care of an eligible child (e.g., prorate costs if some of the care is provided for ineligible family members).

The PHA will verify that the childcare provider is not an assisted family member. Verification will be made through the head of household's declaration of family members who are expected to reside in the unit.

Reasonableness of Expenses

Only reasonable childcare costs can be deducted.

PHA Policy

The actual costs the family incurs will be compared with the PHA's established standards of reasonableness for the type of care in the locality to ensure that the costs are reasonable.

If the family presents a justification for costs that exceed typical costs in the area, the PHA will request additional documentation, as required, to support a determination that the higher cost is appropriate.

**EXHIBIT 7-1: SUMMARY OF DOCUMENTATION REQUIREMENTS
FOR NONCITIZENS [HCV GB, pp. 5-9 and 5-10]**

- **All** noncitizens claiming eligible status must sign a declaration of eligible immigrant status on a form acceptable to the PHA.
- Except for persons 62 or older, all noncitizens must sign a verification consent form
- Additional documents are required based upon the person's status.

Elderly Noncitizens

- A person 62 years of age or older who claims eligible immigration status also must provide proof of age such as birth certificate, passport, or documents showing receipt of SS old-age benefits.

All other Noncitizens

- Noncitizens that claim eligible immigration status also must present the applicable USCIS document. Acceptable USCIS documents are listed below.

- Form I-551 Alien Registration Receipt Card (for permanent resident aliens)
- Form I-94 Arrival-Departure Record annotated with one of the following:
 - “Admitted as a Refugee Pursuant to Section 207”
 - “Section 208” or “Asylum”
 - “Section 243(h)” or “Deportation stayed by Attorney General”
 - “Paroled Pursuant to Section 221 (d)(5) of the USCIS”

- Form I-94 Arrival-Departure Record with no annotation accompanied by:
 - A final court decision granting asylum (but only if no appeal is taken);
 - A letter from a USCIS asylum officer granting asylum (if application is filed on or after 10/1/90) or from a USCIS district director granting asylum (application filed before 10/1/90);
 - A court decision granting withholding of deportation; or
 - A letter from an asylum officer granting withholding or deportation (if application filed on or after 10/1/90).

- Form I-688 Temporary Resident Card annotated “Section 245A” or Section 210”.

Form I-688B Employment Authorization Card annotated “Provision of Law 274a. 12(11)” or “Provision of Law 274a.12”.

- A receipt issued by the USCIS indicating that an application for issuance of a replacement document in one of the above listed categories has been made and the applicant’s entitlement to the document has been verified; or
- Other acceptable evidence. If other documents are determined by the USCIS to constitute acceptable evidence of eligible immigration status, they will be announced by notice published in the *Federal Register*

Allowable Type of Childcare

The type of care to be provided is determined by the family, but must fall within certain guidelines, as discussed in Chapter 6.

PHA Policy

The PHA will verify that the type of childcare selected by the family is allowable, as described in Chapter 6 (~~6-H.F.~~).

The PHA will verify that the fees paid to the childcare provider cover only childcare costs (e.g., no housekeeping services or personal services) and are paid only for the care of an eligible child (e.g., prorate costs if some of the care is provided for ineligible family members).

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- Other acceptable evidence. If other documents are determined by the USCIS to constitute acceptable evidence of eligible immigration status, they will be announced by notice published in the *Federal Register*

Chapter 8.A.

HOUSING QUALITY ~~NATIONAL STANDARDS FOR THE PHYSICAL INSPECTION OF REAL ESTATE~~ AND RENT REASONABLENESS DETERMINATIONS

[24 CFR ~~982.5982~~ Subpart ~~IGI~~ and 24 CFR 982.507 ~~and Notice PIH 2023-28~~]

INTRODUCTION

~~HUD requires that~~ Owners must maintain all units occupied by families receiving Housing Choice Voucher (HCV) ~~and Project Based Voucher (PBV)~~ assistance ~~in accordance with housing quality standards. meet HUD's Housing Quality Standards (HQS) and permits the PHA to establish additional requirements. The use of the term "HQS" in this plan refers to the combination of both HUD and PHA established requirements.~~ Units assisted under the program must comply with HUD's National Standards for the Physical Inspection of Real Estate (NSPIRE) regulations and standards no later than October 1, 2025. Until such time, the PHA ~~may continue using the HQS inspection standards. 2024. The inspection performance standards and procedures for conducting NSPIRE inspections must be included in the administrative plan [Notice PIH 2023-28].~~

~~and permits OHA to establish additional requirements. The use of the term "HQS" in this plan refers to the combination of both HUD and PHA established requirements.~~

All units must pass an NSPIRE HQS inspection prior to the approval of a lease ~~(with some exceptions)~~ and at least once every 24 months ~~(or 36 months for small rural PHAs)~~ during the term of the HAP contract, and at other times as needed, to determine that the unit meets ~~NSPIRE standards~~ HQS. HUD also requires PHAs to determine that rents for units under the program are reasonable when compared to comparable unassisted units in the market area.

~~Provided they meet certain requirements, HUD permits PHAs to establish some additional local requirements in their administrative plans. The use of the term NSPIRE in this plan refers to the combination of both HUD and PHA established requirements. However, state and local codes, compliance is not part of the determination of whether a unit passes the NSPIRE standards.~~

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

This chapter explains HUD and PHA requirements related to ~~physical inspections~~ housing quality and rent reasonableness as follows:

Part I. Physical Standards. This part discusses the ~~NSPIRE~~ physical standards required of units occupied by HCV ~~and PBV~~-assisted families and identifies decisions about the acceptability of the unit that may be made by the family based upon the family's preference. It also identifies ~~affirmative habitability requirements for all units and~~ life-threatening conditions that must be ~~corrected in 24 hours~~ addressed on an expedited basis.

Part II. The Inspection Process. This part describes the types of inspections the PHA will make and the steps that will be taken when units do not meet ~~NSPIRE standards~~ HQS.

Part III. Rent Reasonableness Determinations. This part discusses the policies the PHA will use to make rent reasonableness determinations.

Special ~~NSPIRE~~ HQS requirements for homeownership, manufactured homes, and other special housing types are discussed in Chapter 15 to the extent that they apply in this jurisdiction.

~~NSPIRE~~ Special requirements for the ~~PBV~~ and HQS

Even once the HQS inspection standard has sunset, the regulations at 24 CFR Part 982 and 983 governing the HCV and ~~RAD~~ PBV programs will continue to use the terms *HQS* and *housing quality standards* rather than *NSPIRE*. This is because the definition of *housing quality standards (HQS)* at 24 CFR 982.4 means the minimum quality standards developed by HUD in accordance with 24 CFR 5.703 for the HCV program, including any variations approved by HUD for the PHA. As such, the model policy uses the term *housing quality standards* whenever ~~if~~ applicable regulations use this term. Except in the chapter describing HQS, the acronym *HQS* is not used in the model policy in order to avoid confusion between the umbrella term meaning housing standards and the specific inspection protocol. The model policy only uses the term *NSPIRE* when referring to specific NSPIRE standards.

PART I: ~~NSPIRE~~ PHYSICAL STANDARDS

~~NSPIRE standards are published on HUD's NSPIRE website as well as in the NSPIRE Final Rule [FR Notice 5/1/2023].~~

8-I.A. ~~INSPECTABLE AREAS [24 CFR 5.703(a)(1) and 24 CFR 5.705(a)(2)]~~ GENERAL HUD REQUIREMENTS

~~NSPIRE defines the inspectable areas for inspection under the standards as inside, outside, and unit. However, the inspection requirement for the HCV and PBV programs only applies to units occupied or to be occupied by HCB or PBV participants and common areas and exterior areas which either service or are associated with such units.~~

8-1.B. ~~AFFIRMATIVE HABITABILITY REQUIREMENTS [24 CFR 5.703(b), (c), and (d)]~~

~~NSPIRE provides for minimum or affirmative habitability requirements for each area (unit, inside, outside). These areas must meet these requirements for habitability, which are listed in Exhibit 8-1.~~

~~The inside, outside, and unit must be free of health and safety hazards that pose a danger to residents. Types of health and safety concerns include, but are not limited to carbon monoxide, electrical hazards, extreme temperature, flammable materials or other fire hazards, garbage and debris, handrail hazards, infestation, lead-based paint, mold and structural soundness [24 CFR 5.703(e)].~~

~~The NSPIRE Smoke Alarm Standards does not require that smoke alarms have a sealed battery; however, upon the effective date of the Public and Federally Assisted Housing Fire Safety Act of 2022 on December 29, 2024, sealed batteries will be required.~~

HUD Performance and Acceptability Standards

~~HUD's~~ HUD's performance and acceptability standards for HCV-assisted housing are provided in 24 CFR 982.401. These standards cover the following areas:

- Sanitary facilities
- Food preparation and refuse disposal
- Space and ~~s~~Security
- Thermal ~~e~~Environment
- Illumination and electricity
- Structure and materials
- Interior ~~a~~Air ~~q~~Air Quality
- Water ~~s~~Supply
- Lead-based paint
- Access
- Site and neighborhood

- Sanitary condition
- Smoke ~~d~~Detectors

A summary of HUD performance criteria is provided in Exhibit 8-1. Additional guidance on these requirements is found in the following HUD resources:

- Housing Choice Voucher Guidebook, Chapter 10.
- HUD Housing Inspection Manual for Section 8 Housing
- HUD Inspection Form, form HUD-52580 (3/01) and Inspection Checklist, form HUD-~~52580~~-A (9/00)
- HUD Notice 2003-31, Accessibility Notice: Section 504 of the Rehabilitation Act of 1973; the Americans with Disabilities Act of 1990; the Architectural Barriers Act of 1968 and the Fair Housing Act of 1988.

NSPIRE Standards Applicable to HQS [HUD Letter 6/14/24]

Even if the PHA is still under the HQS inspection standard, the PHA must apply the following requirements under NSPIRE:

- The NSPIRE standards for carbon monoxide alarms are currently applicable even if the PHA has not yet transitioned to NSPIRE;
- PHAs are required to comply with the NSPIRE Smoke Alarm Standard prior to December 30, 2024; and
- The Visual Assessment Standard for Potential Lead-Based Paint Hazard in 24 CFR Part 35 Subparts M and H apply.

Tenant Preference Items

HUD requires the PHA to enforce minimum HQS but also recognizes that certain judgments about the acceptability of the unit are left to the family. For example, the PHA must ensure that the unit contains the required sanitary facilities, but the family decides whether the cosmetic appearance of the facilities is acceptable. Exhibit 8-2 summarizes those items that are considered tenant preferences.

Modifications to Provide Accessibility

~~8.I.C. MODIFICATIONS TO PROVIDE ACCESSIBILITY [24 CFR 100.203; Notice 2003-31; and Notice PIH 2014-02]~~

Under the Fair Housing Act of 1988 an owner must ~~make reasonable accommodations in rules, policies, practices, or services, if necessary for a person with disabilities to use the housing and~~ not refuse the request of a family that contains a person with a disability to make necessary and reasonable modifications to the unit ~~if such modification is necessary to afford the person with a disability full enjoyment of the premises.~~ Such modifications are at the family's expense. The owner may, ~~where it is reasonable to do so,~~ require restoration of the unit to its original condition ~~(reasonable wear and tear excepted)~~ if the modification would interfere with the owner or next occupant's full enjoyment of the premises. The owner may not increase a customarily required security deposit. However, the landlord may negotiate a restoration agreement that requires the family to restore the unit and, if necessary to ensure the likelihood of restoration, may require the tenant to pay a reasonable amount into an interest-bearing escrow account over a reasonable period of time. The interest in any such account accrues to the benefit of the tenant. The owner may also require reasonable assurances that the quality of the work will be acceptable and that any required building permits will be obtained. [24 CFR 100.203; Notice 2003-31].

Modifications to units to provide access for a person with a disability must meet all applicable ~~NSPIRE~~ HQS requirements and conform to the design, construction, or alteration of facilities contained in the UFAS and the ADA Accessibility Guidelines (ADAAG) [28 CFR 35.151(c) and Notice 2003-31] See Chapter 2 of this plan for additional information on reasonable accommodations for persons with disabilities.

PHA Policy

Any owner that intends to negotiate a restoration agreement or require an escrow account must submit the agreement(s) to the PHA for review.

8-I.D.B. ADDITIONAL LOCAL REQUIREMENTS ~~[24 CFR 5.705(a)(3) and Notice PIH 2023-28]~~

The PHA may impose variations to the ~~NSPIRE standards~~ HQS as long as the additional criteria are not likely to adversely affect the health or safety of participant families or severely restrict housing choices for families. HUD approval is required for variations to ~~the HQS. NSPIRE standards and approved variations must be added to the administrative plan. the HQS.~~

HUD approval is not required if the variations are clarifications of HUD's acceptability criteria or performance standards ~~[24 CFR 982.401(a)(4)].~~
~~[24 CFR 982.401(a)(4)].~~

~~HUD may approve inspection criteria variations if the variations apply standards in local housing codes or other codes adopted by the PHA or because of local climatic or geographic conditions. Acceptability criteria variations may only be approved by HUD if such variations either meet or exceed the performance requirements or significantly expand affordable housing opportunities for families assisted under the program.~~

PHA Policy

~~The PHAS has not requested any HUD approved variations to NSPIRE standards.~~

~~All units must meet the minimum standards set forth in CFR 982.401, and Chapter 48 of the Code of the City of Omaha, which incorporates the International Property Maintenance Code. In cases of inconsistency between the City Code and the HQS, the stricter of the two shall prevail.~~

~~If it is determined that, due to application of the Code of the City of Omaha, a Section 8 unit fails inspection due to the unit size needed for the family, the HAP contract will not automatically be terminated but will not be renewed beyond the initial term. At the end of the term, the family will be issued a move packet allowing them to obtain a dwelling of appropriate size.~~

Thermal Environment [HCV GB p.10-7]

The PHA must define a “healthy living environment” for the local climate. This may be done by establishing a temperature that the heating system must be capable of maintaining, that is appropriate for the local climate.

PHA Policy

The heating system must be capable of maintaining an interior temperature of 65 degrees Fahrenheit between October 1 and May 1.

Clarifications of HUD Requirements

PHA Policy

As permitted by HUD, the PHA has adopted the following specific requirements that elaborate on HUD standards.

Walls

In areas where plaster or drywall is sagging, severely cracked, or otherwise damaged, it must be repaired or replaced.

Windows

Window sashes must be in good condition, solid and intact, and properly fitted to the window frame. Damaged or deteriorated sashes must be replaced.

Windows must be weather-stripped as needed to ensure a weather-tight seal.

-Window screens must be in good condition (applies only if screens are present).

-Doors

All exterior doors must be weather-tight to avoid any air or water infiltration, be lockable, have no holes, have all trim intact, and have a threshold.

All interior doors must have no holes, have all trim intact, and be openable without the use of a key.

Floors

All wood floors must be sanded to a smooth surface and sealed. Any loose or warped boards must be resecured and made level. If they cannot be leveled, they must be replaced.

All floors must be in a finished state. Raw wood or unsealed concrete is not permitted.

All floors should have some type of base shoe, trim, or sealing for a "finished look." Vinyl base shoe is permitted.

Sinks

All sinks and commode water lines must have shut off valves, unless faucets are wall mounted.

All sinks must have functioning stoppers.

Toilets

All worn or cracked toilet seats and tank lids must be replaced and toilet tank lid must fit properly.

Security

If window security bars or security screens are present on emergency exit windows, they must be equipped with a quick release system. The owner is responsible for ensuring that the family is instructed on the use of the quick release system.

8-I.C. LIFE-THREATENING DEFICIENCIES-CONDITIONS [Notice PHH 2023-28] 24 CFR 982.404(a); FR Notice 1/18/17]

HUD ~~requires the PHA~~previously required OHA to define life-threatening conditions ~~in the administrative plan. The NSPIRE standards now describe those conditions which are considered life-threatening and must be corrected within 24 hours.~~

~~The following are a list of life-threatening deficiencies under NSPIRE.~~

and to notify the owner or the family (whichever is responsible) of the corrections required. The responsible party must correct life-threatening conditions within 24 hours of PHA notification.

Inspectable Item	Deficiency
Call-for-Aid System	System is blocked, or pull cord is higher than 6 inches off the floor.
	System does not function properly
Carbon Monoxide Alarm	Carbon monoxide alarm is missing, not installed, or not installed in a proper location.
	Carbon monoxide alarm is obstructed.
	Carbon monoxide alarm does not produce an audio or visual alarm when tested.
Chimney	A visually accessible chimney, flue, or firebox connected to a fireplace or wood-burning appliance is incomplete or damaged such that it may not safely contain fire and convey smoke and combustion gases to the exterior.
	Chimney exhibits signs of structural failure.
Clothes Dryer Exhaust Ventilation	Electric dryer transition duct is detached or missing.
	Gas dryer transition duct is detached or missing.
	Electric dryer exhaust ventilation system has restricted airflow.

Inspectable Item	Deficiency
	Dryer transition duct is constructed of unsuitable material.
	Gas dryer exhaust ventilation system has restricted airflow.
Door – Entry	Entry door is missing.
Door – Fire Labeled	Fire labeled door is missing.
Egress	Obstructed means of egress.
	Sleeping room is located on the <u>third</u> floor or below and has an obstructed rescue opening.
	Fire escape is obstructed.
Electrical – Conductor, Outlet, and Switch	Outlet or switch is damaged.
	Exposed electrical conductor.
	Water is currently in contact with an electrical conductor.
Electrical – Service Panel	The overcurrent protection device is damaged.
Exit Sign	Exit sign is damaged, missing, obstructed, or not adequately illuminated.
Fire Escape	Fire extinguisher is damaged or missing.
Fire Extinguisher	Fire extinguisher pressure gauge reads over or under-charged.
	Fire extinguisher service tag is missing, illegible, or expired.
	Fire extinguisher is damaged or missing.
Flammable and Combustible Items	Flammable or combustible item is on or within 3 feet of an appliance that provides heat for thermal comfort or a fuel-burning water heater; OR

Inspectable Item	Deficiency
	Improperly stored chemicals.
Guardrail	Guardrail is missing or not installed.
	Guardrail is not functionally adequate.
Heating, Ventilation, and Air Conditioning (HVAC)	The inspection date is on or between October 1 and March 31 and the permanently installed heating source is not working or the permanently installed heating source is working and the interior temperature is below 64 degrees Fahrenheit.
	Unvented space heater that burns gas, oil, or kerosene is present.
	Combustion chamber cover or gas shutoff valve is missing from a fuel burning heating appliance.
	Fuel burning heating system or device exhaust vent is misaligned, blocked, disconnected, improperly connected, damaged, or missing.
Leak – Gas or Oil	Natural gas, propane, or oil leak.
Mold-like Substance	Presence of mold-like substance at extremely high levels is observed visually.
Smoke Alarm	Smoke alarm is not installed where required.
	Smoke alarm is obstructed.
	Smoke alarm does not produce an audio or visual alarm when tested.
Sprinkler Assembly	Sprinkler head assembly is encased or obstructed by an item or object that is within 18 inches of the sprinkler head.
	Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance.

Inspectable Item	Deficiency
	Sprinkler assembly has evidence of corrosion.
	Sprinkler assembly has evidence of foreign material that is detrimental to performance.
Structural System	Structural system exhibits signs of serious failure.
Toilet	Only 1 toilet was installed, and it is missing.
Water Heater	Chimney or flue piping is blocked, misaligned, or missing.
	Gas shutoff valve is damaged, missing, or not installed.

~~However, PHA's may add additional deficiencies which the PHA considers life-threatening provided they are described in the administrative plan.~~

PHA Policy

~~The~~In addition to those listed under the NSPIRE standards, the following are considered life-threatening ~~conditions; provided they are described in the administrative plan.~~

Any condition that jeopardizes the security of the unit

Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling

Natural or LP gas or fuel oil leaks

A fuel storage vessel, fluid line, valve, or connection that supplies fuel to a HVAC unit is leaking or a strong odor is detected with potential for explosion or fire or that results in a health risk if inhaled

Any electrical problem or condition that could result in shock or fire

A light fixture is readily accessible, is not securely mounted to the ceiling or wall, and electrical connections or wires are exposed

A light fixture is hanging by its wires

A light fixture has a missing or broken bulb, and the open socket is readily accessible to the tenant during the day-to-day use of the unit

A receptacle (outlet) or switch is missing or broken and electrical connections or wires are exposed

An open circuit breaker position is not appropriately blanked off in a panel board, main panel board, or other electrical box that contains circuit breakers or fuses

A cover is missing from any electrical device box, panel box, switch gear box, control panel, etc., and there are exposed electrical connections

Any nicks, abrasions, or fraying of the insulation that exposes conducting wire

Exposed bare wires or electrical connections

Any condition that results in openings in electrical panels or electrical control device enclosures

Water leaking or ponding near any electrical device

Any condition that poses a serious risk of electrocution or fire and poses an immediate life-threatening condition

Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit.

Utilities not in service, including no running hot water

~~Conditions that present the imminent possibility of injury~~

Obstacles that prevent safe entrance or exit from the unit

Any components that affect the function of the fire escape are missing or ~~damaged~~

Stored items or other barriers restrict or prevent the use of the fire escape in the event of an emergency

The building's emergency exit is blocked or impeded, thus limiting the ability of occupants to exit in a fire or other emergency

Absence of a functioning toilet in the unit ~~Inoperable or missing smoke detectors~~

Inoperable or missing smoke detectors

Missing or inoperable carbon monoxide detector

Missing, damaged, discharged, overcharged, or expired fire extinguisher (where ~~required~~)

Gas/oil-fired water heater or heating, ventilation, or cooling system with missing, damaged, improper, or misaligned chimney venting

The chimney or venting system on a fuel-fired water heater is misaligned, negatively pitched, or damaged, which may cause improper or dangerous venting or gases

A gas dryer vent is missing, damaged, or is visually determined to be inoperable, or the dryer exhaust is not vented to the outside

A fuel-fired space heater is not properly vented or lacks available combustion air

A non-vented space heater is present

Safety devices on a fuel-fired space heater are missing or damaged ~~The chimney or venting system on a fuel-fired heating, ventilation, or~~

The chimney or venting system on a fuel-fired heating, ventilation, or cooling system is misaligned, negatively pitched, or damaged, which may cause improper or dangerous venting of gas

Deteriorating paint as defined at 24 CFR 35.110 in a unit built before 1978 that is to be occupied by a family with a child under six years of age if it would prevent the family from moving into the unit.

If an owner fails to correct life-threatening conditions as required by the PHA, the PHA housing assistance payment will ~~enforce~~ be abated and the HQS in accordance with HUD requirements. HAP contract will be terminated. See 8-II-G.

If a family fails to correct a family-caused life-threatening condition as required by the PHA, the PHA will enforce the family obligations. See 8-II.H.

The owner will be required to repair an inoperable smoke detector unless the PHA determines that the family has intentionally disconnected it (by removing batteries or other means). In this case, the family will be required to repair the smoke detector within 24 hours.

8-I.F.D. OWNER AND FAMILY RESPONSIBILITIES [24 CFR 982.404]

The following is applicable to HAP contracts executed or renewed June 5, 2024, or earlier:

Family Responsibilities

The family is responsible for correcting the following HQS deficiencies:

- Tenant-paid utilities not in service
- Failure to provide or maintain appliances owned by the family
- Damage to the unit or premises caused by a household member or guest beyond ordinary~~normal~~ wear and tear that results in a breach of the HQS. "Normal~~Ordinary~~ wear and tear" is defined as items which could not be charged against the tenant'~~stenant's~~ security deposit under state law or court practice.

~~If a family fails to correct a family-caused life-threatening condition as required by the PHA, the PHA will enforce the family obligations. See 8-II.H.~~

~~_____ PHA Policy~~

~~_____ Damages beyond ordinary wear and tear will be considered to be damages which could be assessed against the security deposit under state law or in court practice.~~

Owner Responsibilities

~~The owner must maintain the unit in accordance with NSPIRE regulations and standards. The owner is not responsible for a breach of the HQS that is not caused by the owner, and for which the family is responsible (as provided in 24CFR 982.404 (b) and 982.551(c)).~~

~~_____ PHA Policy~~

~~The owner is responsible for all NSPIRE HQS violations not listed as a family responsibility above, even if the violation is caused by the family'~~s~~ family's living habits (e.g., vermin infestation). However, if the family'~~s~~ family's actions constitute a serious or repeated lease violation, the owner may take legal action to evict the family.~~

~~_____ PHA Policy~~

~~The owner is responsible for all housing quality violations not listed as a family responsibility above, even if the violation is caused by the family's living habits (e.g., vermin infestation). However, if the family's actions constitute a serious or repeated lease violation, the owner may take legal action to evict the family.~~

~~The owner will be required to repair an inoperable smoke detector unless the PHA determines that the family~~family~~ has intentionally disconnected it (by removing batteries~~batteries~~ or other~~

means).~~mean).~~ In this case, the family will be required to repair the smoke detector~~deteeector~~ within 24 hours.

If an owner fails to correct life-threatening conditions as required by the PHA, the PHA will enforce the housing quality~~NSPRE~~ standards in accordance with HUD requirements. -See 8-~~II-~~G.

The following is applicable to HAP contracts executed or renewed June 6, 2024, or later:

Owner Obligation

The owner must maintain the unit in accordance with housing quality standards. A unit is not in compliance with housing quality standards if the PHA or other inspector authorized by the state or local government determines that the unit has housing quality standards deficiencies based upon an inspection, notifies the owner in writing of the deficiencies, and the deficiencies are not remedied within the appropriate time frame.

In the case of a housing quality standards deficiency that the PHA determines is caused by the tenant, any member of the household, or any guest or other person under the tenant's control (other than damage resulting from ordinary use), the PHA may waive the owner's responsibility to remedy the violation. The HAP to the owner may not be withheld or abated if the owner responsibility has been waived. However, if the family's actions constitute a serious or repeated lease violation, the owner may take legal action to evict the family. In addition, the PHA may terminate the family's assistance because of a housing quality standards breach (beyond damage resulting from ordinary use) caused by any member of the household, guest, or other person under the tenant's control.

PHA Policy

The PHA will waive the owner's responsibility for housing quality standards deficiencies that have been determined to have been caused by the tenant, any member of the household, or any guest or other person under the tenant's control, to the extent the tenant can be held responsible for ensuring that the deficiencies are corrected: the tenant must take all necessary steps permissible under the lease and state and local law to remedy the deficiency. This may include paying the owner for the cost of the necessary repairs in accordance with the lease.

Family Responsibilities

The family may be held responsible for a breach of housing quality standards caused by any of the following:

- Tenant-paid utilities not in service;
- Failure to provide or maintain appliances owned by the family; and
- Damage to the dwelling unit or premises caused by a household member or guest beyond ordinary wear and tear.



PHA Policy

Damages beyond ordinary wear and tear will be considered to be damages which could be assessed against the security deposit under state law or in court practice.

If the PHA has waived the owner's responsibility to remedy the violation as outlined under the owner obligations above, the following applies:

- If the housing quality standards breach caused by the family is life-threatening, the family must take all steps permissible under the lease and state and local law to ensure the deficiency is corrected within 24 hours of notification.
- For other family-caused deficiencies, the family must take all steps permissible under the lease and state and local law to ensure the deficiency is corrected within 30 calendar days of notification (or any PHA-approved extension).

If the family has caused a breach of the HQS, the PHA must take prompt and vigorous action to enforce the family obligations. The PHA may terminate assistance for the family in accordance with 24 CFR 982.552.

8-I.G. E. ~~LEAD-BASED PAINT~~ SPECIAL REQUIREMENTS FOR CHILDREN WITH ELEVATED BLOOD LEAD LEVEL [24 CFR 35.1225; FR Notice 1/13/17; Notice PIH 2017-13]

~~PHAs and owners must comply with the requirements and timelines in 24 CFR Part 35 Subpart M—Tenant-Based Rental Assistance and Subpart H—Project-Based Assistance, PHA’s and owners are reminded that any deteriorated paint in target housing, or other lead-based paint hazards identified through a lead-based paint risk assessment or lead-based paint inspection is considered a violation of NSPIRE standards.~~

~~For the HCB program, Subpart M applies to units where a child under age six resides or is expected to reside, common areas that service that unit, and exterior painted surfaces associated with that unit or common areas. For project-based programs, Subpart H applies to assisted units and common areas of the property regardless of whether a child under age six resides or is expected to reside in the unit. NSPIRE does not alter any of the lead-based paint requirements in part 35 for these programs.~~

~~Special Requirements for Children with Elevated Blood Lead Level [24 CFR 35.1225; FR Notice 1/13/17; Notice PIH 2017-13]~~

If a PHA is notified by a public health department or other medical health care provider, or verifies information from a source other than a public health department or medical health care provider, that a child of less than six years of age, living in an HCV-assisted unit has been identified as having an elevated blood lead level, the PHA must complete an environmental investigation of the dwelling unit within 15 calendar days after being notified by a public health department or other medical health care provider. The environmental investigation must be completed in accordance with program requirements, and the result of the environmental investigation must be immediately provided to the owner of the dwelling unit. In cases where the public health department has already completed an evaluation of the unit, this information must be provided to the owner.

Within 30 days after receiving the environmental investigation report from the PHA, or the evaluation from the public health department, the owner is required to complete the reduction of identified lead-based paint hazards in accordance with the lead-based paint regulations [24 CFR 35.1325 and 35.1330; 40 CFR 745.227]. If the owner does not complete the “hazard reduction” as required, the dwelling unit is in violation of HQS and the PHA will take action in accordance with Section 8--II.G.

PHA reporting requirements, and data collection and record keeping responsibilities related to children with an elevated blood lead level are discussed in Chapter 16.

8-I.H.F. VIOLATION OF HQS SPACE STANDARDS [24 CFR ~~5.703(d)(5)~~ 982.401, 24 CFR 982.403]

A dwelling unit must:

- Provide adequate space and security for the family
- Have at least one bedroom or living/sleeping room for each two persons

A unit that does not meet these HQS space standards is defined as *overcrowded*.

~~Units assisted under the HCV or PBV programs must have at least one bedroom or living space for each two persons. A~~ A living room may be used as sleeping (bedroom) space, but no more than two persons may occupy the space [HCV GB p. 10-6]. ~~10-6]. Each habitable room must have two working outlets, or one working outlets and a permanent light. HUD defines a habitable room as a room in a building for living, sleeping, eating or cooking, but excluding bathrooms, toilet rooms, closets, hallways, storage or utility spaces, and similar areas. [FR Notice 5/11/23].~~

~~A unit that does not meet these HQS space standards is defined as *overcrowded*.~~

A bedroom or living/sleeping room must have at least:

- One window
- Two electrical outlets in proper operating condition (permanent overhead or wall-mounted light fixtures may count as one of the required electrical outlets)

If the PHA determines that a unit is overcrowded because of an increase in family size or a change in family composition, the PHA must issue the family a new voucher, and the family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, the PHA must terminate the HAP contract in accordance with its terms.

PART II: THE INSPECTION PROCESS

8-II.A. OVERVIEW [24 CFR 982.405]

Types of Inspections

The PHA conducts the following types of inspections as needed. Each type of inspection is discussed in the paragraphs that follow.

- *Initial Inspections.* The PHA conducts initial inspections in response to a request from the family to approve a unit for participation in the HCV program.
- *Annual/Biennial/Periodic Inspections.* HUD requires the PHA to inspect each unit under lease at least annually or biennially, ~~(or triennially for small, rural PHAs, as defined in 24 CFR 982.305(b)(2),~~ depending on ~~PHA policy~~~~OHA Policy~~, to confirm that the unit still meets ~~NSPIRE standards~~-HQS. The inspection may be conducted in conjunction with the family's annual reexamination but also may be conducted separately.
- *Special-Interim Inspections.* A special inspection may be requested by the owner, the family, or a third party as a result of problems identified with a unit between annual inspections.
- *Supervisory Quality Control Inspections.* HUD requires that a sample of units be inspected by a supervisor or other qualified individual to evaluate the work of the inspector(s) and to ensure that inspections are performed in compliance with the ~~NSPIRE standards~~-HQS.

Inspection of PHA-Owned Units [24 CFR 982.352(b)]

The PHA must obtain the services of an independent entity to perform all ~~NSPIRE~~-HQS inspections in cases where an HCV family is receiving assistance in a PHA-owned unit ~~as defined in 24 CFR 982.4.~~ ~~A PHA-owned unit is defined as a unit that is owned by the PHA that administers the assistance under the consolidated ACC (including a unit owned by an entity substantially controlled by the PHA).~~ The independent ~~entity~~~~agency~~ must communicate the results of each inspection to the family and the PHA. The independent agency must be approved by HUD and may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government). ~~The PHA must inform the family, both orally and in writing, that the family has the right to select any eligible unit available for lease. The PHA~~-owned unit is freely selected by the family, without PHA pressure or steering.

For information on the inspection of PHA-owned units in the PBV program, see Chapters 17 and -18.



Inspection Costs [Notice PIH 2016-05; 24 CFR 5.705(hd)]

The PHA may not charge the family for unit inspections or reinspections [24 CFR 982.405(ge). e)].

In the case of inspections of PHA-owned units, the PHA may compensate the independent agency from ongoing administrative ~~fees (including fees credited to the administrative fee reserve)~~ fee for inspections performed. The PHA and the independent agency may not charge the family any fee or charge for the inspection [24-CFR.982.352(b)].

~~The PHA~~ PHA may not charge the owner for the inspection of the unit prior to the initial term of the lease or for a first inspection during assisted occupancy of the unit. However, the PHA may charge a reasonable fee to owners for reinspections if an owner notifies the PHA that a repair has been made or the allotted time for repairs has elapsed and a reinspection reveals that any deficiency cited in the previous inspection that the owner is responsible for repairing, pursuant to 24 CFR 982.404(a), was not corrected ~~in two situations: when the owner notifies the PHA that a repair has been made but the deficiency has not been corrected, and when the time for repairs has elapsed and the deficiency has not been corrected.~~ Fees may not be imposed for tenant-caused damages, for cases in which the inspector could not gain access to the unit, or for new deficiencies discovered during a reinspection.

The owner may not pass the cost of a reinspection fee to the family. Reinspection fees must be added to the PHA's administrative fee reserves and may only be used for activities related to the provision of tenant-based assistance.

PHA Policy

The PHA will not charge a fee for failed reinspections.

Remote Video Inspections (RVIs) [Notice PIH 2020-31]

As an alternative to some or all on-site inspections, the PHA may, but is not required to, perform HQS inspections from a remote location using video streaming technology and a proxy at the inspection site. Since there may be some circumstances in which the application of technology provides insufficient information or evidence to allow the PHA to make appropriate determinations about whether a condition violates HQS, Notice PIH 2020-31 requires that if a PHA chooses to implement RVIs, the PHA should have policies and procedures in place to address such limitations.

PHA Policy

The PHA will not conduct any HQS inspection using RVI.

Notice and Scheduling

The family must allow the PHA to inspect the unit at reasonable times with reasonable notice [24-CFR 982.551(d)].

PHA Policy

Both the family and the owner will be given reasonable notice of all inspections. Except in the case of a life-threatening emergency, reasonable notice is considered to be not less than 48 hours. Inspections may be scheduled between 8:00 a.m. and 7:00 p.m. Generally, inspections will be conducted on business days only. In the case of a life-threatening emergency, the PHA will give as much notice as possible, given the nature of the emergency.

Owner and Family Inspection Attendance

HUD permits the PHA to set policy regarding family and owner presence at the time of inspection [HCV GB p. 10-27].

PHA Policy

When a family occupies the unit at the time of inspection an authorized adult representative or the owner or a representative must be present for the inspection.

At initial inspection of a vacant unit, the PHA will inspect the unit in the presence of the owner or owner's representative. The presence of a family representative is permitted but is not required.

It is the owner's responsibility to make certain entry can be gained to the common area spaces and heating facilities at the appointed time.

Any "no show" at the scheduled inspection is considered a failed inspection for the owner and participant.

Failure to allow the inspector inside the unit to do an inspection is considered a failed inspection.

~~When a family occupies the unit at the time of inspection, an authorized adult family member (at least 18 years of age) must be present for the inspection. The presence of the owner or the owner's representative is encouraged but is not required.~~

8-II.B. INITIAL HQS INSPECTION [24 CFR 982.4051401(a)]

Approving Units Initial Inspections [FR Notice 1/18/17; Notice PIH 2017-20; and 24 CFR 982.406]

HUD regulations require that units assisted under the HCV program be inspected to determine that the units meet housing quality NSPIRE standards before the PHA approves assisted tenancy. However, while the PHA is required to conduct an inspection prior to approving assisted tenancy, PHAs have two options for bringing units under HAP contract (or, in the case of PBV, approving occupancy and the execution of a lease) more quickly. The PHA may, but is not required to approve assisted tenancy and start HAP if the unit:

- OHA may, but is not required to, approve assisted tenancy and start HAP if the unit Fails the initial HQS inspection, but only if no life-threatening the deficiencies identified are no life-threatening deficiencies are identified; and/or
- Further, OHA may, but is not required to, authorize occupancy if a unit Passed an alternative inspection in the last 24 months.

If the PHA adopts the alternative inspection option in combination with the non-life-threatening deficiencies option, the PHA must follow family and owner notification requirements listed at 24 CFR 982.406(f). Otherwise, if neither of the above provisions are adopted, the PHA must determine that the unit the family selects meets NSPIRE standardsstandards prior to approvingapprovaing tenancy.

Approving Units with Non-Life-Threatening Deficiencies [FR Notice 1/18/17; Notice PIH 2017-20; FR Notice 5/7/24; and 24 CFR 982.405(j)]

The PHA may approve assisted tenancy, execute a HAP contract, and begin paying HAP if a unit fails an initial inspection, but only if the deficiencies identified are non-life threatening. This is known as the “NLT option.” A PHA that implements the NLT option may apply the option to all of the PHA’s initial inspections or may limit it to certain units. If the NLT option is adopted, the PHA must follow requirements listed at 24 CFR 982.405(j) for family and owner notification.

OHA Policy

The Moderate Rehabilitation program OHA will complete the initial inspection within 12060 days of the effective date of the lease.

The PHA’s administrative plan must specify the circumstances under which the PHA will exercise the NLT option, if any.

PHA Policy

The PHA will not use the NLT option. All units unit must pass the initial HQS inspection on or before the effective date of the HAP contract.

Approving Units Using Alternative Inspections [FR Notice 1/18/17; Notice PIH 2017-20; FR Notice 5/7/24; and 24 CFR 982.406]

The PHA may approve assisted tenancy, execute a HAP contract, and begin paying HAP if a unit passed an alternative inspection (i.e., an inspection conducted for another housing program) conducted in the last 24 months provided the PHA is able to obtain the results of the alternative inspection, the property received a “pass” score (if applicable), and the inspection meets the requirements at 24 CFR 982.406(c) and (d). The PHA may implement the use of alternative inspections for both initial and periodic inspections or may limit the use of alternative inspections to either initial or periodic inspections. If alternative inspections are used, the PHA must follow requirements listed at 24 CFR 982.406(e)(2) for family and owner notification.

A PHA relying on an alternative inspections must identify the alternative inspection method being used in the PHA’s administrative plan.

PHA Policy

The unit must pass the initial inspection on or before the effective date of the HAP contract.

The PHA will not rely on alternative inspections and will conduct an initial inspection for each unit prior to executing a HAP contract with the owner.

Initial Inspections [FR Notice 1/18/17]

~~The PHA may, but is not required to, approve assisted tenancy and start HAP if the unit fails HQS inspection, but only if the deficiencies identified are non-life-threatening. Further, the PHA may, but is not required to, authorize occupancy if a unit passed an alternative inspection in the last 24 months.~~

PHA Policy

~~The unit must pass the HQS inspection on or before the effective date of the HAP contract.~~

~~The PHA will not rely on alternative inspections and will conduct an HQS inspection for each unit prior to executing a HAP contract with the owner.~~

Timing of Initial Inspections [24 CFR 982.305395(b)(2)(i)]

Unless the PHA relies on alternative inspections, HUD requires PHAs with fewer than 1,250 budgeted units to complete the initial inspection, determine whether the unit satisfies ~~NSPIRE~~ HQS, and notify the owner and the family of the determination within 15 days of submission of the Request for Tenancy Approval (RTA). For PHAs with 1,250 or more budgeted units, to the extent practicable such inspection and determination must be completed within 15 days. The 15-day period is suspended for any period during which the unit is not available for inspection [982.305(b)(2)].

PHA Policy

The PHA ~~To the extent practicable, OHA~~ will complete the initial inspection, determine whether the unit satisfies ~~NSPIRE standards~~ HQS, and notify the owner and the family of the determination within 15 days of submission of the Request for Tenancy Approval (RTA).

~~In cases where OHA is not able to complete the inspection within 15 days, the file will be documented as to the reason it was not practicable.~~

Inspection Results and Reinspections

For new units proposed for the HCV program, life-threatening deficiencies must be resolved before the HAP contract is executed and the family moves into the unit.

PHA Policy

If any ~~deficiencies~~ HQS violations are identified, the owner will be notified of the deficiencies and be given a time frame to correct them. If requested by the owner, the time frame for correcting the deficiencies may be extended by the PHA for good cause. The PHA will reinspect the unit within five business days of the date the owner notifies the PHA that the required corrections have been made.

If the time period for correcting the deficiencies (or any PHA-approved extension) has elapsed, or the unit fails HQS at the time of the reinspection, the PHA will notify the owner and the family that the unit has been rejected and that the family must search for another unit. The PHA may agree to conduct a second reinspection, for good cause, at the request of the family and owner.

Following a failed reinspection, the family may submit a new Request for Tenancy Approval for the same unit after the owner has made repairs, if they are unable to locate another suitable unit.

Utilities

Generally, at initial lease-up the owner is responsible for demonstrating that all utilities are in working order including those utilities that the family will be responsible for paying.

PHA Policy

If utility service is not ~~must be~~ available for testing at the time of the initial inspection, the PHA will allow the utilities to be placed in service after the unit has met all other HQS requirements. The PHA will reinspect the unit to confirm that utilities are operational before the HAP contract is executed by the PHA.

Appliances [Form HUD-52580]

PHA Policy

If the family is responsible for supplying the stove and/or refrigerator, the PHA will allow the stove and refrigerator to be placed in the unit after the unit has met all other ~~NSPIRE~~ HQS requirements. The required appliances must be in place before the HAP contract is executed by the PHA. The PHA will execute the HAP contract based on a certification from the family that the appliances have been installed and are working. A confirmatory inspection will be scheduled within 30 days of HAP contract approval.

8-II.C. ~~ANNUAL/BIENNIAL/PERIODIC~~ HQS INSPECTIONS [24 CFR 982.405(~~b~~) and ~~982.406~~;

Notice ~~PIH~~ ~~2016-05~~]

PHA Policy

~~Hud requires the PHA to inspect each unit under HAP contract at least biennially (or triennially for small, rural PHAs), to confirm that the unit still meets NSPIRE standards. The inspection may be conducted in conjunction with the family's annual reexamination but also may be conducted separately.~~

OHA Policy

Each unit under HAP contract must be inspected **annually** within **12** months of the last full HQS inspection. The PHA reserves the right to require annual inspections of any unit or owner at any time.

The PHA will not rely on alternative inspection standards.

Scheduling the Inspection

PHA Policy

If an adult cannot be present on the scheduled date, the family should request that the PHA reschedule the inspection. The PHA and family will agree on a new inspection date that generally should take place within five business days of the originally scheduled date. The PHA may schedule an inspection more than five business days after the original date for good cause.

If the family misses the first scheduled appointment without requesting a new inspection date, the PHA will automatically schedule a second inspection. If the family misses two scheduled inspections without PHA approval, the PHA will consider the family to have violated its obligation to make the unit available for inspection. This may result in termination of the family's assistance in accordance with Chapter 12.

8-II.D. ~~SPECIAL-INTERIM~~ INSPECTIONS [24 CFR 982.405(~~dg~~)]

If a participant ~~family~~ or government official notifies the PHA of a potential deficiency, the following applies:

- If the reported deficiency is life-threatening, the PHA must, within 24 hours of notification, both inspect the housing unit and notify the owner if the life-threatening deficiency is confirmed. The owner must then make the repairs within 24 hours of PHA notification.
- If the reported deficiency is non-life-threatening, the PHA must, within 15 days of notification, both inspect the unit and notify the owner if the deficiency is confirmed. The owner must then make the repairs within 30 days of notification from the PHA or within any PHA-approved extension.~~reports a life-threatening condition which the owner would be required to repair within 24 hours, the PHA~~OHA ~~must inspect the unit within 24 hours of notification. If the reported condition is not life-threatening, the PHA must inspect the unit within 15 days of notification.~~

PHA Policy

During ~~an interim~~~~special~~ inspection, the PHA generally will inspect only those deficiencies that were reported. However, the inspector will record any additional HQS deficiencies that are observed and will require the responsible party to make the necessary repairs.

If the ~~annual/biennial~~~~periodic~~ inspection has been scheduled or is due within 90 days of the date the ~~special~~~~interim~~ inspection is scheduled the PHA may elect to conduct a full ~~annual/biennial~~ inspection.

8-II.E. **SUPERVISORY** QUALITY CONTROL INSPECTIONS [24 CFR 982.405(b); 24 CFR 985.3(e); HCV-GB, p. 10-32]

HUD requires a PHA supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the ~~NSPIRE standards~~ HQS.

The unit sample must include only units that have been inspected within the preceding three months. The selected sample should be drawn to represent a cross section of neighborhoods and the work of a cross section of inspectors.

8-II.F. INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT

The following is applicable to HAP contracts executed or renewed June 5, 2024, or earlier:

~~Correction Timeframes~~

~~Each deficiency is identified in the NSPIRE standards as either life-threatening, severe, moderate, or low.~~

~~For units under HAP contract, life-threatening deficiencies must be corrected within 24 hours after notice has been provided. All other non-life-threatening deficiencies (severe and moderate) must be corrected within 30 days (or a PHA approved extension) after notice has been provided. If low deficiencies are present in a unit, these deficiencies result in a pass and would only be noted by the inspector for informational purposes.~~

Notification of Corrective Actions

The owner and the family will be notified in writing of the results of all inspections. When an inspection identifies HQS failures, the PHA will determine (1) whether or not the failure is a life-threatening condition and (2) whether the family or owner is responsible.

PHA Policy

When life-threatening ~~deficiencies~~ conditions are identified, the PHA will immediately notify both parties by telephone or email. The notice will specify who is responsible for correcting the violation. The corrective actions must be taken within 24 hours of the PHA's notice.

When failures that are not life-threatening ~~severe or moderate~~ are identified, the PHA will send the owner and the family a written notification of the inspection results within five business days of the inspection. The written notice will specify who is responsible for correcting the violation, and the time frame within which the failure must be corrected. Generally, not more than 30 days will be allowed for the correction. ~~If low deficiencies are identified, these deficiencies will only be noted for informational purposes.~~

The notice of inspection results will inform the owner that if life-threatening conditions are not corrected within 24 hours, and non-life-threatening conditions are not corrected within the specified time frame (or any PHA-approved extension), the owner's HAP will be abated in accordance with PHA policy (see 8-II.G.).

Likewise, in the case of family caused deficiencies, the notice will inform the family that if corrections are not made within the specified time frame (or any PHA-approved extension, if applicable) the family's assistance will be terminated in accordance with PHA policy (see Chapter 12).

The following is applicable to HAP contracts executed or renewed June 6, 2024, or later:

Notification of Corrective Actions [24 CFR 982.404(d)(1)]

The owner must maintain the unit in accordance with housing quality standards. The unit is in noncompliance with housing quality standards if:

- The PHA or authorized inspector determines the unit has housing quality standards deficiencies based upon an inspection
- The PHA notified the owner in writing of the unit housing quality standards deficiencies; and
- The unit's housing quality standards deficiencies are not corrected within the required timeframes.

A PHA may withhold assistance payments for units that have deficiencies once the owner has been notified in writing of the deficiencies. The PHA's administrative plan must identify the conditions under which the PHA will withhold HAP. In this case, if the unit is brought into compliance during the applicable cure period, the PHA must resume assistance payments and provide payments to cover the time period for which the payments were withheld.

The PHA must abate the HAP, including amounts that had been withheld, if the owner fails to make the repairs within the applicable cure period. In this case, the PHA must notify the family and the owner that it is abating payments and, if the unit does not meet housing quality standards within 60 days (or a reasonable longer period established by the PHA), the PHA will terminate the HAP contract for the unit and the family will have to move to receive continued assistance. In this case, the PHA must issue the family its voucher to move at least 30 days prior to the termination of the HAP contract.

PHA Policy

The owner and the family will be notified in writing of the results of all inspections. When an inspection identifies housing quality standards failures, the PHA will determine (1) whether or not the failure is a life-threatening condition and (2) whether the family or owner is responsible.

The PHA will not withhold assistance payments upon notification of the deficiencies to the owner.

When life-threatening conditions are identified, the PHA will immediately notify both parties by telephone or email. The notice will specify who is responsible for correcting the violation. The corrective actions must be taken within 24 hours of the PHA's notice.

When failures that are not life-threatening are identified, the PHA will send the owner and the family a written notification of the inspection results within five business days of the inspection. The written notice will specify who is responsible for correcting the violation, and the time frame within which the failure must be corrected. Generally, not more than 30 days will be allowed for the correction.

If the owner is responsible for correcting the deficiency, the notice of inspection results will inform the owner that if life-threatening conditions are not corrected within 24 hours, and non-life-threatening conditions are not corrected within the specified time frame (or any PHA-approved extension), the owner's HAP will be abated in accordance with PHA policy (see 8-II.G.).

Likewise, if the family is responsible for correcting the deficiency, the notice will inform the family that if corrections are not made within the specified time frame (or any PHA-approved extension, if applicable) the family's assistance will be terminated in accordance with PHA policy (see Chapter 12).

Extensions

For conditions that are life-threatening, the PHA ~~deficiencies, OHA~~ cannot grant an extension to the 24 hour corrective action period. For conditions that are not life-threatening, the PHA ~~severe or moderate, OHA~~ may grant an exception to the required time frames for correcting the violation, if the PHA determines that an extension is appropriate [24 CFR 982.404].

PHA Policy

Extensions will be granted in cases where has determined that the owner has made a good faith effort to correct the deficiencies and is unable to for reasons beyond the owner's control. Reasons may include, but are not limited to:

A repair cannot be completed because required parts or services are not available.

A repair cannot be completed because of weather conditions.

A reasonable accommodation is needed because the family includes a person with disabilities.

The length of the extension will be determined on a case-by-case basis, but will not exceed 90 days, except in the case of delays caused by winter weather conditions. In the case of winter weather conditions, extensions will be continued until spring when the weather has improved sufficiently to make repairs possible.

~~The length of the extension will be determined on a case-by-case basis, but will not exceed 60 days, except in the case of delays caused by weather conditions. In the case of weather conditions, extensions may be continued until the weather has improved sufficiently to make repairs possible. The necessary repairs must be made within 15 calendar days, once the weather conditions have subsided.~~

Reinspections [24 CFR 982.405(i)]

When a PHA must verify correction of a deficiency, the PHA may use verification methods other than another on-site inspection. The PHA may establish different verification methods for initial and non-initial inspections or for different deficiencies. Upon either an inspection for initial occupancy or a reinspection, the PHA may accept photographic evidence or other reliable evidence from the owner to verify that a deficiency has been corrected.

PHA Policy

The PHA will conduct a reinspection immediately following the end of the corrective period, or any PHA approved extension.

The family and owner will be given reasonable notice of the reinspection appointment. If the deficiencies have not been corrected by the time of the reinspection, the PHA will send a notice of abatement to the owner, or in the case of family caused violations, a notice of termination to the family, in accordance with PHA policies. If the PHA is unable to gain entry to the unit in order to conduct the scheduled reinspection, the PHA will consider the family to have violated its obligation

to make the unit available for inspection. This may result in termination of the family's assistance in accordance with Chapter 12.

The PHA will not accept self-certification of HQS repairs.

~~The Inspection Department will use their own discretion on a case-by-case basis to allow for the use of photos or other documentation of repairs rather than conducting a physical reinspection that deficiencies were corrected.~~

8-II.G. ENFORCING OWNER COMPLIANCE

If the owner fails to maintain the dwelling unit in accordance with ~~NSPIRE standards~~-HQS, the PHA~~OHA~~ must take prompt and vigorous action to enforce the owner obligations.

The following is applicable to HAP contracts executed or renewed June 5, 2024, or earlier:

HAP Abatement

If an owner fails to correct HQS deficiencies by the time specified by the PHA, HUD requires the PHA to abate housing assistance payments no later than the first of the month following the specified correction period (including any approved extension) [24 CFR 985.3(f)]. No retroactive payments will be made to the owner for the period of time the rent was abated. Owner rents are not abated as a result of ~~deficiencies~~-HQS failures that are the family's~~family's~~ responsibility.

PHA Policy

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).

The PHA will inspect abated units within **seven** business days of the owner's notification that the work has been completed. Payment will resume effective on the day the unit passes inspection.

During any abatement period the family continues to be responsible for its share of the rent. The owner must not seek payment from the family for abated amounts and may not use the abatement as cause for eviction.

HAP Contract Termination

The PHA must decide how long any abatement period will continue before the HAP contract will be terminated. The PHA should not terminate the contract until the family finds another unit, provided the family does so in a reasonable time [HCV GB p. 10-29] and must give the owner reasonable notice of the termination. The PHA will issue a voucher to permit the family to move to another unit as described in Chapter 10.

PHAHowever, if the owner completes corrections and notifies the PHA before the termination date of the HAP contract, the PHA may rescind the termination notice if (1) the family still resides in the unit and wishes to remain in the unit and (2) the unit passes inspection.

Reasonable notice of HAP contract termination by the PHA is 30 days.

The following is applicable to HAP contracts executed or renewed June 6, 2024, or later:

HAP Withholding [24 CFR 982.404(d)(1)]

A PHA may withhold assistance payments for units that have housing quality standards deficiencies once the PHA has notified the owner in writing of the deficiencies. The PHA's administrative plan must identify the conditions under which the PHA will withhold HAP. In this case, if the unit is brought into compliance during the applicable cure period, the PHA resumes assistance payments and provides assistance payments to cover the time period for which the payments were withheld.

PHA Policy

The PHA will not withhold assistance payments upon notification to the owner of the deficiencies.

HAP Abatement [24 CFR 982.404(d)(2)]

The PHA must abate the HAP, including amounts that had been withheld, if the owner fails to make the repairs within the applicable cure period. In this case, the PHA must notify the family and the owner that it is abating payments and, if the unit does not meet housing quality standards within 60 days (or a reasonable longer period established by the PHA), the PHA will terminate the HAP contract for the unit and the family will have to move to receive continued assistance. In this case, the PHA must issue the family its voucher to move at least 30 days prior to the termination of the HAP contract.

The owner may not terminate the tenancy of any family due to the withholding or abatement of assistance.

PHA Policy

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).

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 day the unit passes inspection.

During any abatement period the family continues to be responsible for its share of the rent.

For PHA policies on family moves when units are in abatement and termination of the HAP contract when a family moves due to deficiencies, see Section 10-I.B.

HAP Contract Termination

The PHA must decide how long any abatement period will continue before the HAP contract will be terminated. The PHA should not terminate the contract until the family finds another unit, provided the family does so in a reasonable time [HCV GB p. 10-29] and must give the owner reasonable notice of the termination. The PHA will issue a voucher to permit the family to move to another unit as described in Chapter 10.

PHA Policy

~~The maximum length of time that HAP may be abated is 90 days.~~

PHA Policy

The maximum length of time that HAP may be abated is 60 days. However, if the owner completes corrections and notifies the PHA before the termination date of the HAP contract, the PHA may rescind the termination notice if (1) the family still resides in the unit and wishes to remain in the unit and (2) the unit passes inspection.

Reasonable notice of HAP contract termination by the PHA is 30 days. The PHA will issue a voucher to permit the family to move to another unit as described in Chapter 10.

8-II.H. ENFORCING FAMILY COMPLIANCE WITH HQS [24 CFR 982.404(b)]

The following is applicable to HAP contracts executed or renewed June 5, 2024, or earlier:

Families are responsible for correcting any HQS violations ~~deficiencies~~ listed in paragraph 8.I.D. If the family fails to correct a violation within the period allowed by the PHA (and any extensions), the PHA will terminate the family's assistance, according to the policies described in Chapter 12.

If the owner carries out a repair for which the family is responsible under the lease, the owner may bill the family for the cost of the repair.

The following is applicable to HAP contracts executed or renewed June 6, 2024, or later:

If the PHA waived the landlord responsibility for housing quality standards deficiencies that have been determined to have been caused by the tenant, any member of the household, or any guest or other person under the tenant's control (see section 8-I.D), the family is responsible for correcting any housing quality standards violations listed in paragraph 8.I.D. If the family fails to correct a violation within the period allowed by the PHA (and any extensions), the PHA will terminate the family's assistance, according to the policies described in Chapter 12.

If the owner carries out a repair for which the family is responsible under the lease, the owner may bill the family for the cost of the repair and may enter into a repayment agreement with the family.

PART III: RENT REASONABLENESS [24 CFR 982.507]

8-III.A. OVERVIEW

Except in the case of certain LIHTC- and HOME-assisted units, no HAP contract can be approved until [the PHA](#) has determined that the rent for the unit is reasonable. The purpose of the rent reasonableness test is to ensure that a fair rent is paid for each unit rented under the HCV program.

HUD regulations define a reasonable rent as one that does not exceed the rent charged for comparable, unassisted units in the same market area. HUD also requires that owners not charge more for assisted units than for comparable units on the premises. This part explains the method used to determine whether a unit's rent is reasonable.

PHA-Owned Units [24 CFR 982.352(b)]

In cases where an HCV family is receiving assistance in a PHA-owned unit, the PHA must obtain the services of an independent entity to determine rent reasonableness in accordance with program requirements, and to assist the family in negotiating the contract rent when the family requests assistance. A PHA-owned unit is defined as a unit that is owned by the PHA that administers the assistance under the consolidated ACC (including a unit owned by an entity substantially controlled by the PHA). The independent agency must communicate the results of the rent reasonableness determination to the family and the PHA. The independent agency must be approved by HUD, and may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government).

8-III.B. WHEN RENT REASONABLENESS DETERMINATIONS ARE REQUIRED

Owner-Initiated Rent Determinations

The PHA must make a rent reasonableness determination at initial occupancy and whenever the owner requests a rent adjustment.

The owner and family first negotiate the rent for a unit. The PHA (or independent agency in the case of PHA-owned units) will assist the family with the negotiations upon request. At initial occupancy the PHA must determine whether the proposed rent is reasonable before a HAP Contract is signed. The owner must not change the rent during the initial lease term. Subsequent requests for rent adjustments must be consistent with the lease between the owner and the family. Rent increases will not be approved unless any failed items identified by the most recent HQS inspection have been corrected.

PHA Policy

After the initial occupancy period, the owner may request a rent adjustment in accordance with the owner's lease. For rent increase requests after initial lease-up, the PHA may request owners to provide information about the rents charged for other units on the premises, if the premises include more than 4 units. In evaluating the proposed rents in comparison to other units on the premises the PHA will consider unit size and length of tenancy in the other units.

The PHA will determine whether the requested increase is reasonable within 10 business days of receiving the request from the owner. The owner will be notified of the determination in writing.

All rents adjustments will be effective the first of the month following 60 days after the PHA's receipt of the owner's request or on the date specified by the owner, whichever is later.

PHA and HUD-Initiated Rent Reasonableness Determinations

HUD requires the PHA to make a determination of rent reasonableness (even if the owner has not requested a change) if there is a 10 percent decrease in the fair market rent that goes into effect at least 60 days before the contract anniversary date. HUD also may direct the PHA to make a determination at any other time. The PHA may decide that a new determination of rent reasonableness is needed at any time.

PHA Policy

In addition to the instances described above, the PHA will make a determination of rent reasonableness at any time after the initial occupancy period if: (1) the PHA determines that the initial rent reasonableness determination was in error or (2) the PHA determines that the information provided by the owner about the unit or other units on the same premises was incorrect.

LIHTC and HOME-Assisted Units [24 CFR 982.507(c)]

For units receiving low-income housing tax credits (LIHTCs) or units assisted under HUD's HOME Investment Partnerships (HOME) Program, a rent comparison with unassisted units is not required if the voucher rent does not exceed the rent for other LIHTC- or HOME-assisted units in the project that are not occupied by families with tenant-based assistance.

For LIHTCs, if the rent requested by the owner does exceed the LIHTC rents for non-voucher families, the PHA must perform a rent comparability study in accordance with program regulations. In such cases, the rent shall not exceed the lesser of: (1) the reasonable rent as determined from the rent comparability study; or (2) the payment standard established by the PHA for the unit size involved.

8-III.C. HOW COMPARABILITY IS ESTABLISHED

Factors to Consider

HUD requires PHAs to take into consideration the factors listed below when determining rent comparability. The PHA may use these factors to make upward or downward adjustments to the rents of comparison units when the units are not identical to the HCV-assisted unit.

- Location and age
- Unit size including the number of rooms and square footage of rooms
- The type of unit including construction type (e.g., single family, duplex, garden, low-rise, high-rise)
- The quality of the units including the quality of the original construction, maintenance and improvements made
- Amenities, services, and utilities included in the rent

Units that Must Not Be Used as Comparables

Comparable units must represent unrestricted market rents. Therefore, units that receive some form of federal, state, or local assistance that imposes rent restrictions cannot be considered comparable units. These include units assisted by HUD through any of the following programs: Section 8 project-based assistance, Section 236 and Section 221(d)(3) Below Market Interest Rate (BMIR) projects, HOME or Community Development Block Grant (CDBG) program-assisted units in which the rents are subsidized; units subsidized through federal, state, or local tax credits; units subsidized by the Department of Agriculture rural housing programs, and units that are rent-controlled by local ordinance [Notice PIH 2002-22, Notice PIH 2005-20, and Notice PIH 2020-19].

Note: Notice PIH 2020-19, issued August 21, 2020, provides further guidance on the issue of what constitutes an assisted unit.

Rents Charged for Other Units on the Premises

The Request for Tenancy Approval (HUD-52517) requires owners to provide information, on the form itself, about the rent charged for other unassisted comparable units on the premises if the premises include more than 4 units.

By accepting the PHA payment each month the owner certifies that the rent is not more than the rent charged for comparable unassisted units on the premises. If asked to do so, the owner must give the PHA information regarding rents charged for other units on the premises.

8-III.D. PHA RENT REASONABLENESS METHODOLOGY

How Market Data Is Collected

PHA Policy

The PHAOHA will primarily utilize www.myhousingsearch.com which will collect and maintain data on market rents in the PHA's jurisdiction. Information sources include newspapers, realtors, market surveys, inquiries of owners, and other available sources. The data will be maintained by bedroom size and market areas. Market areas may be defined by zip codes—, census tract, neighborhood, and identifiable natural or man-made boundaries. The data will be updated on an ongoing basis and rent information that is more than 12 months old will be eliminated from the database. ~~archived in www.myhousingsearch.com.~~ Market Rent Data greater than 12 months old will not be used for eligibility but may be used for reference.

How Rents Are Determined

PHA Policy

The rent for a unit proposed for HCV assistance will be compared to the rent charged for comparable units in the same market area. The PHA will develop a range of prices for comparable units by bedroom size within defined market areas. Units proposed for HCV assistance will be compared to the units within this rent range. Because units may be similar, but not exactly like the unit proposed for HCV assistance, the PHA may make adjustments to the range of prices to account for these differences.

—The adjustment must reflect the local market. Not all differences in units require adjustments (e.g., the presence or absence of a garbage disposal may not affect the rent in some market areas).

~~OHA uses a unit-to-unit comparison, by which the rent for a unit proposed for HCV assistance is directly compared to the rents for one or more unassisted units selected as comparables within the same market area. Geocoded maps will be used to identify the non-assisted units in closest proximity to the subject unit, and unit data information will be used to select the most similar units.~~

~~In comparing rents, OHA will take into account critical market factors that impact rent, including the location, quality, size, unit type, and age of the contract unit, as well as any amenities, housing services, maintenance and utilities to be provided by the owner in accordance with the lease.~~

~~Where comparable units differ from the unit proposed for t HCV assistance, OHA will determine whether those differences impact rent. Where they do, OHA will adjust the rental value of the caomparnable uits, up or down, based on the market value of these factores. Ther rent for the unit proposed for HCV assistance will be compared to the adjuexted rents for the comparable units, enabling a fair, accurate, market-based determination of rent reasonable.ess.~~

Adjustments may vary by unit type (e.g., a second bathroom may be more valuable in a three-bedroom unit than in a two-bedroom).

–The adjustment must reflect the rental value of the difference—not its construction costs (e.g., it might cost \$20,000 to put on a new roof, but the new roof might not make any difference in what a tenant would be willing to pay because rental units are presumed to have functioning roofs).

–When a comparable project offers rent concessions (e.g., first month rent-free, or reduced rent) reported monthly rents will be adjusted accordingly. –For example, if a comparable project reports rents of \$500/month but new tenants receive the first month's rent free, the actual rent for the unit would be calculated as follows: $\$500 \times 11 \text{ months} = 5500 / 12 \text{ months} = \text{actual monthly rent of } \$488$.

The PHA will notify the owner of the rent the PHA can approve based upon its analysis of rents for comparable units. The owner may submit information about other comparable units in the market area. The PHA will confirm the accuracy of the information provided and consider this additional information when making rent determinations. The owner must submit any additional information within **ten** business days of the PHA's request for information or the owner's request to submit information.



EXHIBIT 8-1: OVERVIEW OF HUD HOUSING QUALITY STANDARDS

EXHIBIT 8-1: AFFIRMATIVE HABITABILITY REQUIREMENTS

Affirmative Habitability Requirements: Inside

~~Must include at least 1 battery-operated or hard-wired smoke detector, in proper working condition, on each level of the property.~~

~~Must meet or exceed the carbon monoxide detection standards set by the Secretary through *Federal Register* notification.~~

~~Any outlet installed within 6 feet of a water source must be GFCI protected.~~

~~Must have a guardrail when there is an elevated walking surface with a drop-off of 30 inches or greater measured vertically.~~

~~Must have permanently mounted light fixtures in any kitchens and each bathroom.~~

~~May not contain unvented space heaters that burn gas, oil, or kerosene.~~

Affirmative Habitability Requirements: Outside

~~Any outlet installed within 6 feet of a water source must be GFCI protected.~~

~~Must have a guardrail when there is an elevated walking surface with a drop-off of 30 inches or greater measured vertically.~~

Affirmative Habitability Requirements: Unit

~~Must have hot and cold running water in the bathroom and kitchen, including an adequate source of safe drinking water in the bathroom and kitchen.~~

~~Must include its own bathroom or sanitary facility that is in proper operating condition and usable in privacy. It must contain a sink, a bathtub or shower, and an interior flushable toilet.~~

~~Must include at least 1 battery-operated or hard-wired smoke detector, in proper working condition, in the following locations:~~

- ~~• On each level of the unit AND~~
- ~~• Inside each bedroom or sleeping area AND~~
- ~~• Within 21 feet of any door to a bedroom measured along a path of travel AND~~
- ~~• Where a smoke detector is installed outside a bedroom is separated from an adjacent living area~~
 - ~~—by a door, a smoke detector must also be installed in the living areas side of the door.~~

~~If the unit is occupied by a hearing-impaired person, the smoke detectors must have an alarm system designed for hearing-impaired persons.~~

~~Must have a living room and a kitchen area with a sink, cooking appliance, refrigerator, food preparation areas and food storage area.~~

~~Must have two working outlets or one working outlet and one permanent light fixture within all habitable rooms.~~

~~Must have a permanently mounted light fixture in each bathroom and in the kitchen.~~

~~Any outlet installed within 6 feet of a water source must be GFCI protected.~~

~~Must have permanently installed heating source.~~

~~No units may contain unvented space heaters that burn gas, oil, or kerosene~~

Must have a guardrail when there is an elevated walking surface with a drop-off of 30 inches or greater measured vertically.

Must have at least one bedroom or living/sleeping room for each two persons.

EXHIBIT 8-1: OVERVIEW OF HUD HOUSING QUALITY STANDARDS

Note: __—This document provides an overview of HQS. For more detailed information see the following documents:

- 24 CFR 982.401, Housing Quality Standards (HQS)
- Housing Choice Voucher Guidebook, Chapter 10.
- HUD Housing Inspection Manual for Section 8 Housing
- HUD Inspection Form, form HUD-52580 (3/01) and Inspection Checklist, form HUD--52580--A (9/00)

Sanitary Facilities

The dwelling unit must include sanitary facilities within the unit. The sanitary facilities must be usable in privacy and must be in proper operating condition and adequate for personal cleanliness and disposal of human waste.

Food Preparation and Refuse Disposal

The dwelling unit must have space and equipment suitable for the family to store, prepare, and serve food in a sanitary manner.

Space and Security

The dwelling unit must provide adequate space and security for the family. This includes having at least one bedroom or living/sleeping room for each two persons.

Thermal Environment

The unit must have a safe system for heating the dwelling unit. Air conditioning is not required but if provided must be in proper operating condition. The dwelling unit must not contain unvented room heaters that burn gas, oil, or kerosene. Portable electric room heaters or kitchen stoves with built-in heating units are not acceptable as a primary source of heat for units located in climatic areas where permanent heat systems are required.

Illumination and Electricity

Each room must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of occupants. The dwelling unit must have sufficient electrical sources so occupants can use essential electrical appliances. Minimum standards are set for different types of rooms. Once the minimum standards are met, the number, type and location of electrical sources are a matter of tenant preference.

Structure and Materials

The dwelling unit must be structurally sound. Handrails are required when four or more steps (risers) are present, and protective railings are required when porches, balconies, and stoops are thirty inches or more off

the ground. The elevator servicing the unit must be working [if there is one]. Manufactured homes must have proper tie-down devices capable of surviving wind loads common to the area.

Interior Air Quality

The dwelling unit must be free of air pollutant levels that threaten the occupants' health. There must be adequate air circulation in the dwelling unit. Bathroom areas must have one openable window or other adequate ventilation. Any sleeping room must have at least one window. If a window was designed to be opened, it must be in proper working order.

Water Supply

The dwelling unit must be served by an approved public or private water supply that is sanitary and free from contamination. Plumbing fixtures and pipes must be free of leaks and threats to health and safety.

Lead-Based Paint

Lead-based paint requirements apply to dwelling units built prior to 1978 that are occupied or can be occupied by families with children under six years of age, excluding zero bedroom dwellings. Owners must:

- Disclose known lead-based paint hazards to prospective tenants before the lease is signed,
- provide all prospective families with "Protect Your Family from Lead in Your Home",
- Stabilize deteriorated painted surfaces and conduct hazard reduction activities within 30 days when identified by [the PHA OHA](#)
- Notify tenants each time such an activity is performed
- Conduct all work in accordance with HUD safe practices
- As part of ongoing maintenance ask each family to report deteriorated paint
- Maintain covered housing without deteriorated paint if there is child under six in the family

For units occupied by elevated blood lead level (lead poisoned) children under six years of age, an environmental investigation must be conducted (paid for by [the PHA OHA](#)). If lead hazards are identified during the environmental investigation, the owner must complete hazard reduction activities within 30 days.

See HCV GB p. 10-15 for a detailed description of these requirements. For additional information on lead-based paint requirements see 24 CFR 35, Subparts A, B, M, and R.

Access

Use and maintenance of the unit must be possible without unauthorized use of other private properties. The building must provide an alternate means of exit in case of fire.

Site and Neighborhood

The site and neighborhood must be reasonably free from disturbing noises and reverberations, excessive trash or vermin, or other dangers to the health, safety, and general welfare of the occupants.

Sanitary Condition

The dwelling unit and its equipment must be in sanitary condition and free of vermin and rodent infestation. The unit must have adequate barriers to prevent infestation.

Smoke Detectors

Smoke detectors must be installed in accordance with and meet the requirements of the National Fire Protection Association Standard (NFPA) 74 (or its successor standards). If the dwelling unit is occupied by any person with a hearing impairment, smoke detectors must have an appropriate alarm system as specified in NFPA 74 (or successor standards).

Hazards and Heath/Safety

The unit, interior and exterior common areas accessible to the family, the site, and the surrounding neighborhood must be free of hazards to the family's health and safety.



EXHIBIT 8-2: SUMMARY OF TENANT PREFERENCE AREAS -RELATED TO HOUSING QUALITY

Note: —This document provides an overview of unit and site characteristics and conditions for which the family determines acceptability. For more detailed information see the following documents:

- Housing Choice Voucher Guidebook, Chapter 10.
- HUD Housing Inspection Manual for Section 8 Housing
- HUD Inspection Form, form HUD-52580 (3/01) and Inspection Checklist, form HUD-52580-A (9/00)

Provided the minimum housing quality standards have been met, HUD permits the family to determine whether the unit is acceptable with regard to the following characteristics.

- *Sanitary Facilities.* The family may determine the adequacy of the cosmetic condition and quality of the sanitary facilities, including the size of the lavatory, tub, or shower; the location of the sanitary facilities within the unit; and the adequacy of the water heater.
- *Food Preparation and Refuse Disposal.* The family selects size and type of equipment it finds acceptable. When the family is responsible for supplying cooking appliances, the family may choose to use a microwave oven in place of a conventional oven, stove, or range. When the owner is responsible for providing cooking appliances, the owner may offer a microwave oven in place of an oven, stove, or range only if other subsidized and unsubsidized units on the premises are furnished with microwave ovens only. The adequacy of the amount and type of storage space, the cosmetic conditions of all equipment, and the size and location of the kitchen are all determined by the family.
- *Space and Security.* The family may determine the adequacy of room sizes and room locations. The family is also responsible for deciding the acceptability of the type of door and window locks.
- *Energy conservation items.* The family may determine whether the amount of insulation, presence of absence of storm doors and windows and other energy conservation items are acceptable.
- *Illumination and Electricity.* The family may determine whether the location and the number of outlets and fixtures (over and above those required to meet HQS standards) are acceptable or if the amount of electrical service is adequate for the use of appliances, computers, or stereo equipment.

- (1) *Structure and Materials*. Families may determine whether minor defects, such as lack of paint, or worn flooring or carpeting will affect the livability of the unit.
- (2)• *Indoor Air*. Families may determine whether window and door screens, filters, fans, or other devices for proper ventilation are adequate to meet the family's needs. However, if screens are present they must be in good condition.
- (3)• *Sanitary Conditions*. The family determines whether the sanitary conditions in the unit, including minor infestations, are acceptable.
- (4)• *Neighborhood conditions*. Families may determine whether neighborhood conditions such as the presence of drug activity, commercial enterprises, and convenience to shopping will affect the livability of the unit.

Families have no discretion with respect to lead-based paint standards and smoke detectors.

Chapter 8

HOUSING-QUALITY NATIONAL STANDARDS FOR THE PHYSICAL INSPECTION OF REAL ESTATE AND RENT REASONABLENESS DETERMINATIONS

[24 CFR ~~5982~~ Subpart ~~GI~~ and 24 CFR 982.507 and Notice PIH 2023-28]

INTRODUCTION

HUD requires that all units occupied by families receiving Housing Choice Voucher (HCV) and Project Based Voucher (PBV) assistance meet HUD's ~~Housing Quality Standards (HQS)~~ National Standards for the Physical Inspection of Real Estate (NSPIRE) regulations and standards no later than October 1, 2024. The inspection performance standards and procedures for conducting NSPIRE inspections must be included in the administrative plan [Notice PIH 2023-28]. ~~and permits OHA to establish additional requirements. The use of the term "HQS" in this plan refers to the combination of both HUD and PHA-established requirements.~~

All units must pass an **NSPIRE HQS** inspection prior to the approval of a lease (with some exceptions) and at least once every 24 months (or 36 months for small rural PHAs) during the term of the **HAP** contract, and at other times as needed, to determine that the unit meets **NSPIRE standards HQS**. HUD also requires PHAs to determine that rents for units under the program are reasonable when compared to comparable unassisted units in the market area.

~~Provided they meet certain requirements, HUD permits PHAs to establish some additional local requirements in their administrative plans. The use of the term NSPIRE in this plan refers to the combination of both HUD and PHA-established requirements. However, state and local codes, compliance is not part of the determination of whether a unit passes the NSPIRE standards.~~

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

This chapter explains HUD and PHA requirements related to ~~physical inspections housing quality~~ and rent reasonableness as follows:

Part I. Physical Standards. This part discusses the **NSPIRE physical** standards required of units occupied by HCV and PBV-assisted families ~~and identifies decisions about the acceptability of the unit that may be made by the family based upon the family's preference.~~ It also identifies affirmative habitability requirements for all units and life-threatening conditions that must be ~~corrected in 24 hours-addressed on an expedited basis.~~

Part II. The Inspection Process. This part describes the types of inspections OHA will make and the steps that will be taken when units do not meet **NSPIRE standards HQS**.

Part III. Rent Reasonableness Determinations. This part discusses the policies OHA will use to make rent reasonableness determinations.

Special **NSPIRE HQS**-requirements for homeownership, manufactured homes, and other special housing types are discussed in Chapter 15 to the extent that they apply in this jurisdiction.

~~Special requirements for the PBV and RAD PBV programs (if applicable) are discussed in Chapters 17 and 18 respectively.~~

NSPIRE and HQS

Even once the HQS inspection standard has sunset, the regulations at 24 CFR Part 982 and 983 governing the HCV and PBV programs will continue to use the terms *HQS* and *housing quality standards* rather than *NSPIRE*. This is because the definition of *housing quality standards (HQS)* at 24 CFR 982.4 means the minimum quality standards developed by HUD in accordance with 24 CFR 5.703 for the HCV program, including any variations approved by HUD for the PHA. As such, the model policy uses the term *housing quality standards* whenever applicable regulations use this term. Except in the chapter describing HQS, the acronym *HQS* is not used in the model policy in order to avoid confusion between the umbrella term meaning housing standards and the specific inspection protocol. The model policy only uses the term *NSPIRE* when referring to specific NSPIRE standards.

PART I: ~~NSPIRE PHYSICAL~~ STANDARDS

NSPIRE standards are published on HUD's NSPIRE website as well as in the NSPIRE Final Rule [FR Notice 5/1/2023].

8-I.A. INSPECTABLE AREAS [24 CFR 5.703(a)(1) and 24 CFR 5.705(a)(2)] ~~GENERAL HUD REQUIREMENTS~~

NSPIRE defines the inspectable areas for inspection under the standards as inside, outside, and unit. However, the inspection requirement for the HCV and PBV programs only applies to units occupied or to be occupied by HCB or PBV participants and common areas and exterior areas which either service or are associated with such units.

8-1. B. AFFIRMATIVE HABITABILITY REQUIREMENTS [24 CFR 5.703(b), (c), and (d)]

NSPIRE provides for minimum or affirmative habitability requirements for each area (unit, inside, outside). These areas must meet these requirements for habitability, which are listed in Exhibit 8-1.

The inside, outside, and unit must be free of health and safety hazards that pose a danger to residents. Types of health and safety concerns include, but are not limited to carbon monoxide, electrical hazards, extreme temperature, flammable materials or other fire hazards, garbage and debris, handrail hazards, infestation, lead-based pain, mold and structural soundness [24 CFR 5.703(e)].

The NSPIRE Smoke Alarm Standards does not require that smoke alarms have a sealed battery; however, upon the effective date of the Public and Federally Assisted Housing Fire Safety Act of 2022 on December 29, 2024, sealed batteries will be required.

~~HUD Performance and Acceptability Standards~~

~~HUD's performance and acceptability standards for HCV-assisted housing are provided in 24 CFR 982.401. These standards cover the following areas:~~

- ~~•—Sanitary facilities~~
- ~~•—Food preparation and refuse disposal~~
- ~~•—Space and Security~~
- ~~•—Thermal Environment~~
- ~~•—Illumination and electricity~~
- ~~•—Structure and materials~~
- ~~•—Interior Air Quality~~
- ~~•—Water Supply~~
- ~~•—Lead-based paint~~
- ~~•—Access~~
- ~~•—Site and neighborhood~~
- ~~•—Sanitary condition~~

- ~~Smoke Detectors~~

~~A summary of HUD performance criteria is provided in Exhibit 8-1. Additional guidance on these requirements is found in the following HUD resources:~~

- ~~Housing Choice Voucher Guidebook, Chapter 10.~~
- ~~HUD Housing Inspection Manual for Section 8 Housing~~
- ~~HUD Inspection Form, form HUD-52580 (3/01) and Inspection Checklist, form HUD-52580-A (9/00)~~
- ~~HUD Notice 2003-31, Accessibility Notice: Section 504 of the Rehabilitation Act of 1973; the Americans with Disabilities Act of 1990; the Architectural Barriers Act of 1968 and the Fair Housing Act of 1988.~~

Tenant Preference Items

~~HUD requires OHA to enforce minimum HQS but also recognizes that certain judgments about the acceptability of the unit are left to the family. For example, OHA must ensure that the unit contains the required sanitary facilities, but the family decides whether the cosmetic appearance of the facilities is acceptable. Exhibit 8-2 summarizes those items that are considered tenant preferences.~~

8.I.C. MODIFICATIONS TO PROVIDE ACCESSIBILITY [24 CFR 100.203; Notice 2003-31; and Notice PIH 2014-02]

Under the Fair Housing Act of 1988 an owner must **make reasonable accommodations in rules, policies, practices, or services, if necessary for a person with disabilities to use the housing and not refuse the request of a family that contains a person with a disability to make necessary and reasonable modifications to the unit if such modification is necessary to afford the person with a disability full enjoyment of the premises** . Such modifications are at the family's expense. The owner may, **where it is reasonable to do so**, require restoration of the unit to its original condition **(reasonable wear and tear excepted)** if the modification would interfere with the owner or next occupant's full enjoyment of the premises. The owner may not increase a customarily required security deposit. However, the landlord may negotiate a restoration agreement that requires the family to restore the unit and, if necessary to ensure the likelihood of restoration, may require the tenant to pay a reasonable amount into an interest-bearing escrow account over a reasonable period of time. The interest in any such account accrues to the benefit of the tenant. The owner may also require reasonable assurances that the quality of the work will be acceptable and that any required building permits will be obtained. [24 CFR 100.203; Notice 2003-31].

Modifications to units to provide access for a person with a disability must meet all applicable **NSPIRE HQS** requirements and conform to the design, construction, or alteration of facilities contained in the UFAS and the ADA Accessibility Guidelines (ADAAG) [28 CFR 35.151(c) and Notice 2003-31] See Chapter 2 of this plan for additional information on reasonable accommodations for persons with disabilities.

PHA Policy

Any owner that intends to negotiate a restoration agreement or require an escrow account must submit the agreement(s) to OHA for review.

8-I.D.B. ADDITIONAL LOCAL REQUIREMENTS [24 CFR 5.705(a)(3) and Notice PIH 2023-28]

OHA may impose variations to the ~~NSPIRE standards~~ **HQS** as long as the additional criteria are not likely to adversely affect the health or safety of participant families or severely restrict housing choices for families. HUD approval is required for variations to ~~NSPIRE standards and approved variations must be added to the administrative plan.~~ **the HQS.**

~~HUD approval is not required if the variations are clarifications of HUD's acceptability criteria or performance standards [24 CFR 982.401(a)(4)].~~

HUD may approve inspection criteria variations if the variations apply standards in local housing codes or other codes adopted by the PHA or because of local climatic or geographic conditions. Acceptability criteria variations may only be approved by HUD if such variations either meet or exceed the performance requirements or significantly expand affordable housing opportunities for families assisted under the program.

PHA Policy

The PHA has not requested any HUD-approved variations to NSPIRE standards.

All units must meet the minimum standards set forth in CFR 982.401, and the Code of the City of Omaha, which incorporates the International Property Maintenance Code. In cases of inconsistency between the City Code and the HQS, the stricter of the two shall prevail.

If it is determined that, due to application of the Code of the City of Omaha, a Section 8 unit fails inspection due to the unit size needed for the family, the HAP contract will not automatically be terminated but will not be renewed beyond the initial term. At the end of the term, the family will be issued a move packet allowing them to obtain a dwelling of appropriate size.

Thermal Environment [HCV-GB p.10-7]

~~OHA must define a “healthy living environment” for the local climate. This may be done by establishing a temperature that the heating system must be capable of maintaining, that is appropriate for the local climate.~~

OHA Policy

~~The heating system must be capable of maintaining an interior temperature of 65 degrees Fahrenheit between October 1 and May 1.~~

Clarifications of HUD Requirements

OHA Policy

~~As permitted by HUD, OHA has adopted the following specific requirements that elaborate on HUD standards.~~

Walls

~~In areas where plaster or drywall is sagging, severely cracked, or otherwise damaged, it must be repaired or replaced.~~

Windows

~~Window sashes must be in good condition, solid and intact, and properly fitted to the window frame. Damaged or deteriorated sashes must be replaced.~~

~~Windows must be weather-stripped as needed to ensure a weather-tight seal.~~

~~Window screens must be in good condition (applies only if screens are present).~~

Doors

~~All exterior doors must be weather-tight to avoid any air or water infiltration, be lockable, have no holes, have all trim intact, and have a threshold.~~

~~All interior doors must have no holes, have all trim intact, and be openable without the use of a key.~~

Floors

~~All wood floors must be sanded to a smooth surface and sealed. Any loose or warped boards must be resecured and made level. If they cannot be leveled, they must be replaced.~~

~~All floors must be in a finished state. Raw wood or unsealed concrete is not permitted.~~

~~All floors should have some type of base shoe, trim, or sealing for a "finished look." Vinyl base shoe is permitted.~~

Sinks

~~All sinks and commode water lines must have shut-off valves, unless faucets are wall mounted.~~

~~All sinks must have functioning stoppers.~~

Toilets

~~All worn or cracked toilet seats and tank lids must be replaced and toilet tank lid must fit properly.~~

Security

~~If window security bars or security screens are present on emergency exit windows, they must be equipped with a quick-release system. The owner is responsible for ensuring that the family is instructed on the use of the quick-release system.~~

8-I.C. LIFE-THREATENING DEFICIENCIES CONDITIONS [Notice PIH 2023-28] 24-CFR 982.404(a); FR Notice 1/18/17]

HUD previously required OHA to define life-threatening conditions in the administrative plan. The NSPIRE standards now describe those conditions which are considered life-threatening and must be corrected within 24 hours.

The following are a list of life-threatening deficiencies under NSPIRE.

and to notify the owner or the family (whichever is responsible) of the corrections required. The responsible party must correct life-threatening conditions within 24 hours of PHA notification.

<u>Inspectable Item</u>	<u>Deficiency</u>
<u>Call-for-Aid System</u>	<u>System is blocked, or pull cord is higher than 6 inches off the floor.</u>
	<u>System does not function properly</u>
<u>Carbon Monoxide Alarm</u>	<u>Carbon monoxide alarm is missing, not installed, or not installed in a proper location.</u>
	<u>Carbon monoxide alarm is obstructed.</u>
	<u>Carbon monoxide alarm does not produce an audio or visual alarm when tested.</u>
<u>Chimney</u>	<u>A visually accessible chimney, flue, or firebox connected to a fireplace or wood-burning appliance is incomplete or damaged such that it may not safely contain fire and convey smoke and combustion gases to the exterior.</u>
	<u>Chimney exhibits signs of structural failure.</u>
<u>Clothes Dryer Exhaust Ventilation</u>	<u>Electric dryer transition duct is detached or missing.</u>
	<u>Gas dryer transition duct is detached or missing.</u>
	<u>Electric dryer exhaust ventilation system has restricted airflow.</u>
	<u>Dryer transition duct is constructed of unsuitable material.</u>
	<u>Gas dryer exhaust ventilation system has restricted airflow.</u>
<u>Door – Entry</u>	<u>Entry door is missing.</u>
<u>Door – Fire Labeled</u>	<u>Fire labeled door is missing.</u>
<u>Egress</u>	<u>Obstructed means of egress.</u>
	<u>Sleeping room is located on the third floor or below and has an obstructed rescue opening.</u>
	<u>Fire escape is obstructed.</u>
<u>Electrical – Conductor, Outlet, and Switch</u>	<u>Outlet or switch is damaged.</u>
	<u>Exposed electrical conductor.</u>
	<u>Water is currently in contact with an electrical conductor.</u>
<u>Electrical – Service Panel</u>	<u>The overcurrent protection device is damaged.</u>
<u>Exit Sign</u>	<u>Exit sign is damaged, missing, obstructed, or not adequately illuminated.</u>

<u>Inspectable Item</u>	<u>Deficiency</u>
<u>Fire Escape</u>	<u>Fire ~~extinguisher~~ is escape component is</u> damaged or missing.
<u>Fire Extinguisher</u>	<u>Fire extinguisher pressure gauge reads over or under-charged.</u>
	<u>Fire extinguisher service tag is missing, illegible, or expired.</u>
	<u>Fire extinguisher is damaged or missing.</u>
<u>Flammable and Combustible Items</u>	<u>Flammable or combustible item is on or within 3 feet of an appliance that provides heat for thermal comfort or a fuel-burning water heater;</u> <u>OR</u> <u>Improperly stored chemicals.</u>
<u>Guardrail</u>	<u>Guardrail is missing or not installed.</u>
	<u>Guardrail is not functionally adequate.</u>
<u>Heating, Ventilation, and Air Conditioning (HVAC)</u>	<u>The inspection date is on or between October 1 and March 31 and the permanently installed heating source is not working or the permanently installed heating source is working and the interior temperature is below 64 degrees Fahrenheit.</u>
	<u>Unvented space heater that burns gas, oil, or kerosene is present.</u>
	<u>Combustion chamber cover or gas shutoff valve is missing from a fuel burning heating appliance.</u>
	<u>Fuel burning heating system or device exhaust vent is misaligned, blocked, disconnected, improperly connected, damaged, or missing.</u>
<u>Leak – Gas or Oil</u>	<u>Natural gas, propane, or oil leak.</u>
<u>Mold-like Substance</u>	<u>Presence of mold-like substance at extremely high levels is observed visually.</u>
<u>Smoke Alarm</u>	<u>Smoke alarm is not installed where required.</u>
	<u>Smoke alarm is obstructed.</u>
	<u>Smoke alarm does not produce an audio or visual alarm when tested.</u>
<u>Sprinkler Assembly</u>	<u>Sprinkler head assembly is encased or obstructed by an item or object that is within 18 inches of the sprinkler head.</u>
	<u>Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance.</u>
	<u>Sprinkler assembly has evidence of corrosion.</u>
	<u>Sprinkler assembly has evidence of foreign material that is detrimental to performance.</u>
<u>Structural System</u>	<u>Structural system exhibits signs of serious failure.</u>
<u>Toilet</u>	<u>Only 1 toilet was installed, and it is missing.</u>
<u>Water Heater</u>	<u>Chimney or flue piping is blocked, misaligned, or missing.</u>
	<u>Gas shutoff valve is damaged, missing, or not installed.</u>

However, PHA's may add additional deficiencies which the PHA considers life-threatening provided they are described in the administrative plan.

PHA Policy

In addition to those listed under the NSPIRE standards, the following are considered life-threatening provided they are described in the administrative plan.

Utilities not in service, including no running hot water

Any condition that jeopardizes the security of the unit

Major plumbing leaks or flooding, waterlogged ceiling or floor in imminent danger of falling

Natural or LP gas or fuel oil leaks

A fuel storage vessel, fluid line, valve, or connection that supplies fuel to a HVAC unit is leaking or a strong odor is detected with potential for explosion or fire or that results in a health risk if inhaled

Any electrical problem or condition that could result in shock or fire

A light fixture is readily accessible, is not securely mounted to the ceiling or wall, and electrical connections or wires are exposed

A light fixture is hanging by its wires

A light fixture has a missing or broken bulb, and the open socket is readily accessible to the tenant during the day-to-day use of the unit

A receptacle (outlet) or switch is missing or broken and electrical connections or wires are exposed

An open circuit breaker position is not appropriately blanked off in a panel board, main panel board, or other electrical box that contains circuit breakers or fuses

A cover is missing from any electrical device box, panel box, switch gear box, control panel, etc., and there are exposed electrical connections

Any nicks, abrasions, or fraying of the insulation that exposes conducting wire

Exposed bare wires or electrical connections

Any condition that results in openings in electrical panels or electrical control device enclosures

Water leaking or ponding near any electrical device

Any condition that poses a serious risk of electrocution or fire and poses an immediate life-threatening condition

Absence of a working heating system when outside temperature is below 60 degrees Fahrenheit.

Conditions that present the imminent possibility of injury
Obstacles that prevent safe entrance or exit from the unit

Any components that affect the function of the fire escape are missing or damaged

Stored items or other barriers restrict or prevent the use of the fire escape in the event of an emergency

The building's emergency exit is blocked or impeded, thus limiting the ability of occupants to exit in a fire or other emergency

Absence of a functioning toilet in the unit
Inoperable or missing smoke detectors

Missing or inoperable carbon monoxide detector

Missing, damaged, discharged, overcharged, or expired fire extinguisher (where required)

Gas/oil-fired water heater or heating, ventilation, or cooling system with missing, damaged, improper, or misaligned chimney venting

The chimney or venting system on a fuel-fired water heater is misaligned, negatively pitched, or damaged, which may cause improper or dangerous venting or gases

A gas dryer vent is missing, damaged, or is visually determined to be inoperable, or the dryer exhaust is not vented to the outside

A fuel-fired space heater is not properly vented or lacks available combustion air

A non-vented space heater is present

Safety devices on a fuel-fired space heater are missing or damaged

The chimney or venting system on a fuel-fired heating, ventilation, or cooling system is misaligned, negatively pitched, or damaged, which may cause improper or dangerous venting of gas

Deteriorating paint as defined at 24 CFR 35.110 in a unit built before 1978 that is to be occupied by a family with a child under six years of age if it would prevent the family from moving into the unit.

If an owner fails to correct life threatening conditions as required by the OHA, the housing assistance payment will be abated and the HAP contract will be terminated. See 8-II-G.

If a family fails to correct a family caused life threatening condition as required by the OHA, the OHA may terminate the family's assistance.

See 8-II.H.

8-I.F.D. OWNER AND FAMILY RESPONSIBILITIES [24 CFR 982.404]

The following is applicable to HAP contracts executed or renewed June 5, 2024, or earlier:

Family Responsibilities

The family is responsible for correcting the following ~~HQS~~ deficiencies:

- Tenant-paid utilities not in service
- Failure to provide or maintain appliances owned by the family
- Damage to the unit or premises caused by a household member or guest beyond normal wear and tear ~~that results in a breach of the HQS. "Normal wear and tear" is defined as items which could not be charged against the tenant's security deposit under state law or court practice.~~

If a family fails to correct a family-caused life-threatening condition as required by the PHA, the PHA will enforce the family obligations. See 8-II.H.

PHA Policy

Damages beyond ordinary wear and tear will be considered to be damages which could be assessed against the security deposit under state law or in court practice.

Owner Responsibilities

The owner must maintain the unit in accordance with ~~NSPIRE housing quality standards regulations and standards~~. The owner is not responsible for a breach of ~~housing quality standards~~ ~~the HQS~~ that is not caused by the owner, and for which the family is responsible (as provided in 24 CFR 982.404(b) and 982.551(c)).

PHA Policy

The owner is responsible for all ~~NSPIRE housing quality~~ violations not listed as a family responsibility above, even if the violation is caused by the family's living habits (e.g., vermin infestation). However, if the family's actions constitute a serious or repeated lease violation, the owner may take legal action to evict the family.

The owner will be required to repair an inoperable smoke detector unless the PHA determines that the family has intentionally disconnected it (by removing batteries or other means). In this case, the family will be required to repair the smoke detector within 24 hours.

If an owner fails to correct life-threatening conditions as required by the PHA, the PHA will enforce the ~~NSPIRE housing quality~~ standards in accordance with HUD requirements. See 8-II-G.

The following is applicable to HAP contracts executed or renewed June 6, 2024, or later.

Owner Obligation

The owner must maintain the unit in accordance with housing quality standards. A unit is not in compliance with housing quality standards if the PHA or other inspector authorized by the state or local government determines that the unit has housing quality standards deficiencies based upon an inspection, notifies the owner in writing of the deficiencies, and the deficiencies are not remedied within the appropriate time frame.

In the case of a housing quality standards deficiency that the PHA determines is caused by the tenant, any member of the household, or any guest or other person under the tenant's control (other than damage resulting from ordinary use), the PHA may waive the owner's responsibility to remedy the violation. The HAP to the owner may not be withheld or abated if the owner responsibility has been waived. However, if the family's actions constitute a serious or repeated lease violation, the owner may take legal action to evict the family. In addition, the PHA may terminate the family's assistance because of a housing quality standards breach (beyond damage resulting from ordinary use) caused by any member of the household, guest, or other person under the tenant's control.

PHA Policy

The PHA will waive the owner's responsibility for housing quality standards deficiencies that have been determined to have been caused by the tenant, any member of the household, or any guest or other person under the tenant's control, to the extent the tenant can be held responsible for ensuring that the deficiencies are corrected: the tenant must take all necessary steps permissible under the lease and state and local law to remedy the deficiency. This may include paying the owner for the cost of the necessary repairs in accordance with the lease.

Family Responsibilities

The family may be held responsible for a breach of housing quality standards caused by any of the following:

- Tenant-paid utilities not in service;
- Failure to provide or maintain appliances owned by the family; and
- Damage to the dwelling unit or premises caused by a household member or guest beyond ordinary wear and tear.

PHA Policy

Damages beyond ordinary wear and tear will be considered to be damages which could be assessed against the security deposit under state law or in court practice.

If the PHA has waived the owner's responsibility to remedy the violation as outlined under [the](#) owner obligations above, the following applies:

- If the housing quality standards breach caused by the family is life-threatening, the family must take all steps permissible under the lease and [state](#) and local law to ensure the deficiency is corrected within 24 hours of notification.
- For other family-caused deficiencies, the family must take all steps permissible under the lease and [state](#) and local law to ensure the deficiency is corrected within 30 calendar days of notification (or any PHA-approved extension).

If the family has caused a breach of housing quality standards, the PHA must take prompt and vigorous action to enforce the family obligations. The PHA may terminate assistance for the family in accordance with 24 CFR 982.552.

~~8-I.G. E. LEAD-BASED PAINT SPECIAL REQUIREMENTS FOR CHILDREN WITH ELEVATED BLOOD LEAD LEVEL [24 CFR 35.1225; FR Notice 1/13/17; Notice PIH 2017-13]~~

PHAs and owners must comply with the requirements and timelines in 24 CFR Part 35 Subpart M- Tenant-Based Rental Assistance and Subpart H – Project-Based Assistance, PHA's and owners are reminded that any deteriorated paint in target housing, or other lead-based paint hazared identified through a lead-based pain risk assessment or lead-based paint inspection is considered a violation of NSPIRE standards.

For the HCB program, Subpart M applies to units where a child under age six resides or is expected to reside, common areas that service that unit, and exterior painted surfaces associated with that unit or common areas. For project-based programs, Subpart H applies to assisted units and common areas of the property regardless of whether a child under age six resides or is expected to reside in the unit. NSPIRE does not alter any of the lead-based paint requiriemetns in part 35 for these programs.

Special Requirements for Children with Elevated Blood Lead Level [24 CFR 35.1225; FR Notice 1/13/17; Notice PIH 2017-13]

If a PHA is notified by a public health department or other medical health care provider, or verifies information from a source other than a public health department or medical health care provider, that a child of less than six years of age, living in an HCV-assisted unit has been identified as having an elevated blood lead level, OHA must complete an environmental investigation of the dwelling unit within 15 calendar days after being notified by a public health department or other medical health care provider. The environmental investigation must be completed in accordance with program requirements, and the result of the environmental investigation must be immediately provided to the owner of the dwelling unit. In cases where the public health department has already completed an evaluation of the unit, this information must be provided to the owner.

Within 30 days after receiving the environmental investigation report from the PHA, or the evaluation from the public health department, the owner is required to complete the reduction of identified lead-based paint hazards in accordance with the lead-based paint regulations [24 CFR 35.1325 and 35.1330; 40 CFR 745.227]. If the owner does not complete the "hazard reduction" as required, the dwelling unit is in violation of [HQS-NSPIRE](#) and the PHA will take action in accordance with Section 8-II.G.

PHA reporting requirements, and data collection and record keeping responsibilities related to children with an elevated blood lead level are discussed in Chapter 16.

~~8-I.H.F. VIOLATION OF HQS SPACE STANDARDS [24 CFR 5.703(d)(5) 982.401, 24 CFR 982.403]~~

~~A dwelling unit must:~~

- ~~• Provide adequate space and security for the family~~
- ~~• Have at least one bedroom or living/sleeping room for each two persons~~

Units assisted under the HCV or PBV programs must have at least one bedroom or living space for each two persons. A living room may be used as sleeping (bedroom) space, but no more than two persons may occupy the space [HCV GB p. 10-6]. ~~Each habitable room must have two working~~

outlets, or one working outlet and a permanent light. HUD defines a habitable room as a room in a building for living, sleeping, eating or cooking, but excluding bathrooms, toilet rooms, closets, hallways, storage or utility spaces, and similar areas. [FR Notice 5/11/23].

A unit that does not meet these HQS space standards is defined as *overcrowded*.

~~A bedroom or living/sleeping room must have at least:~~

- ~~• One window~~
- ~~• Two electrical outlets in proper operating condition (permanent overhead or wall-mounted light fixtures may count as one of the required electrical outlets)~~

If the PHA determines that a unit is overcrowded because of an increase in family size or a change in family composition, The PHA must issue the family a new voucher, and the family and PHA must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, the PHA must terminate the HAP contract in accordance with its terms.

PART II: THE INSPECTION PROCESS

8-II.A. OVERVIEW [24 CFR 982.405]

Types of Inspections

OHA conducts the following types of inspections as needed. Each type of inspection is discussed in the paragraphs that follow.

- *Initial Inspections.* The PHA conducts initial inspections in response to a request from the family to approve a unit for participation in the HCV program.
- *Annual/Biennial/Periodic Inspections.* HUD requires the PHA to inspect each unit under lease at least annually or biennially (or triennially for small rural PHAs as defined in 24 CFR 982.305(b)(2)), depending on PHA policy, to confirm that the unit still meets ~~NSPIRE~~ housing quality standards.
- *Special-Interim Inspections.* A special inspection may be requested by the owner, the family, or a third party as a result of problems identified with a unit between annual inspections.
- *Quality-Supervisory Control Inspections.* HUD requires that a sample of units be inspected by a supervisor or other qualified individual to evaluate the work of the inspector(s) and to ensure that inspections are performed in compliance with ~~the NSPIRE~~ housing quality standards.

Inspection of PHA-Owned Units [24 CFR 982.352(b)]

The PHA must obtain the services of an independent entity to perform all ~~NSPIRE~~ inspections in cases where an HCV family is receiving assistance in a PHA-owned unit as defined in 24 CFR 982.4. ~~A PHA-owned unit is defined as a unit that is owned by the PHA that administers the assistance under the consolidated ACC (including a unit owned by an entity substantially controlled by the PHA).~~ The independent ~~entity~~ agency must communicate the results of each inspection to the family and the PHA. The independent agency must be approved by HUD and may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government). The PHA must inform the family, both orally and in writing, that the family has the right to select any eligible unit available for lease. PHA-owned unit is freely selected by the family, without PHA pressure or steering.

For information on the inspection of PHA-owned units in the PBV program, see Chapters 17 and 18.

Inspection Costs [Notice PIH 2016-05; and 24 CFR 5.705(~~hd~~)]

The PHA may not charge the family for unit inspections or reinspections [24 CFR 982.405(~~ge~~)].

In the case of inspections of PHA-owned units, the PHA may compensate the independent agency from ongoing administrative fees (including fees credited to the administrative fee reserve) -for inspections performed. The PHA and the independent agency may not charge the family any fee or charge for the inspection [24 CFR.982.352(b)(~~1~~)(~~v~~)(~~B~~)].

The PHA may not charge the owner for the inspection of the unit prior to the initial term of the lease or for a first inspection during assisted occupancy of the unit. However, the PHA may charge a reasonable fee to owners for reinspections if an owner notifies the PHA that a repair has been made or the allotted time for repairs has elapsed and a reinspection reveals that any deficiency cited in the previous inspection that the owner is responsible for repairing, pursuant to 24 CFR 982.404(a), was not corrected. ~~in two situations: when the owner notifies the PHA that a repair has been made but the deficiency has not been corrected, and when the time for repairs has elapsed and the deficiency has not been corrected.~~ Fees may not be imposed for tenant-caused damages, for cases in which the inspector could not gain access to the unit, or for new deficiencies discovered during a reinspection.

The owner may not pass the cost of a reinspection fee to the family. Reinspection fees must be added to the PHA's administrative fee reserves and may only be used for activities related to the provision of tenant-based assistance.

PHA Policy

The PHA will not charge a fee for failed reinspections.

Remote Video Inspections (RVIs) [Notice PIH 2020-31]

As an alternative to some or all on-site inspections, OHA may, but is not required to, perform ~~NSPIRE~~ **HQS** inspections from a remote location using video streaming technology and a proxy at the inspection site. Since there may be some circumstances in which the application of technology provides insufficient information or evidence to allow OHA to make appropriate determinations about whether a condition violates ~~NSPIRE standards~~ **HQS**, Notice PIH 2020-31 requires that if a PHA chooses to implement RVIs, OHA should have policies and procedures in place to address such limitations.

PHA Policy

The PHA will not conduct any ~~HQS~~ inspection using RVI.

Notice and Scheduling

The family must allow OHA to inspect the unit at reasonable times with reasonable notice [24 CFR 982.551(d)].

PHA Policy

Both the family and the owner will be given reasonable notice of all inspections. Except in the case of a life-threatening emergency, reasonable notice is considered to be not less than 48 hours. Inspections may be scheduled between 8:00 a.m. and 7:00 p.m. Generally, inspections will be conducted on business days only. In the case of a life-threatening emergency, OHA will give as much notice as possible, given the nature of the emergency.

Owner and Family Inspection Attendance

HUD permits OHA to set policy regarding family and owner presence at the time of inspection [HCV GB p. 10-27].

PHA Policy

When a family occupies the unit at the time of inspection an authorized adult representative or the owner or a representative must be present for the inspection.

At initial inspection of a vacant unit, the PHA will inspect the unit in the presence of the owner or owner's representative. The presence of a family representative is permitted but is not required.

It is the owner's responsibility to make certain entry can be gained to the common area spaces and heating facilities at the appointed time.

Any "no show" at the scheduled inspection is considered a failed inspection for the owner and participant.

Failure to allow the inspector inside the unit to do an inspection is considered a failed inspection.

8-II.B. INITIAL ~~HQS~~ INSPECTION [24 CFR 982.401(a)]

~~Approving Units Initial Inspections [FR Notice 1/18/17; Notice PIH 2017-20; and 24 CFR 982.406]~~

HUD regulations require that units assisted under the HCV program be inspected to determine that the units meet housing quality NSPIRE standards before the PHA approves assisted tenancy. However, ~~while the PHA is required to conduct an inspection prior to approving assisted tenancy,~~ PHAs have two options for bringing units under HAP contract (or, in the case of PBV, approving occupancy and the execution of a lease) more quickly. The PHA may, but is not required to approve assisted tenancy and start HAP if the unit:

- Fails the initial inspection, but only if no life-threatening deficiencies are identified; and/or:
- Passed an alternative inspection in the last 24 months.

~~OHA may, but is not required to, approve assisted tenancy and start HAP if the unit Fails the initial HQS inspection, but only if the deficiencies identified are no life-threatening deficiencies are identified.~~

~~Further, OHA may, but is not required to, authorize occupancy if a unit Passed an alternative inspection in the last 24 months.~~

If the PHA adopts the alternative inspection option in combination with the non-life-threatening deficiencies option, the PHA must follow family and owner notification requirements listed at 24 CFR 982.406(f).

Otherwise, if neither of the above provisions are adopted, the PHA must determine that the unit the family selects meets NSPIRE standards prior to approving tenancy.

PHA Policy

The Moderate Rehabilitation program the PHA will complete the initial inspection within ~~120-60~~ days of the effective date of the lease.

The unit must pass the ~~initial HQS~~ inspection on or before the effective date of the HAP contract.

~~The PHA will not rely on alternative inspections and will conduct an HQS inspection for each unit prior to executing a HAP contract with the owner.~~

Approving Units with Non-Life-Threatening Deficiencies [FR Notice 1/18/17; Notice PIH 2017-20; FR Notice 5/7/24; and 24 CFR 982.405(j)]

The PHA may approve assisted tenancy, execute a HAP contract, and begin paying HAP if a unit fails an initial inspection, but only if the deficiencies identified are non-life threatening. This is known as the “NLT option.” A PHA that implements the NLT option may apply the option to all of the PHA's initial inspections or may limit it to certain units. If the NLT option is adopted, the PHA must follow requirements listed at 24 CFR 982.405(j) for family and owner notification.

The PHA's administrative plan must specify the circumstances under which the PHA will exercise the NLT option, if any.

PHA Policy

The PHA will not use the NLT option. All~~The~~ units must pass the initial inspection on or before the effective date of the HAP contract.

Approving Units Using Alternative Inspections [FR Notice 1/18/17; Notice PIH 2017-20; FR Notice 5/7/24; and 24 CFR 982.406]

The PHA may approve assisted tenancy, execute a HAP contract, and begin paying HAP if a unit passed an alternative inspection (i.e., an inspection conducted for another housing program) conducted in the last 24 months provided the PHA is able to obtain the results of the alternative inspection, the property received a “pass” score (if applicable), and the inspection meets the requirements at 24 CFR 982.406(c) and (d). The PHA may implement the use of alternative inspections for both initial and periodic inspections or may limit the use of alternative inspections to either initial or periodic inspections. If alternative inspections are used, the PHA must follow requirements listed at 24 CFR 982.406(e)(2) for family and owner notification.

A PHA relying on an alternative inspections must identify the alternative inspection method being used in the PHA’s administrative plan.

PHA Policy

The PHA will not rely on alternative inspections and will conduct an initial inspection for each unit prior to executing a HAP contract with the owner.

Timing of Initial Inspections [24 CFR 982.395(b)(2)(i)]

Unless the PHA relies on alternative inspections, HUD requires PHAs with fewer than 1,250 budgeted units to complete the initial inspection, determine whether the unit satisfies ~~NSPIRE~~ housing quality standards, and notify the owner and the family of the determination within 15 days of submission of the Request for Tenancy Approval (RTA). For PHAs with 1,250 or more budgeted units, to the extent practicable such inspection and determination must be completed within 15 days. The 15-day period is suspended for any period during which the unit is not available for inspection.

~~[982.305(b)(2)].~~

PHA Policy

The PHA will complete the initial inspection, determine whether the unit satisfies NSPIRE standards, and notify the owner and the family of the determination within 15 days of submission of the Request for Tenancy Approval (RTA).

In cases where the PHA is not able to complete the inspection within 15 days, the file will be documented as to the reason it was not practicable.

Inspection Results and Reinspections

For new units proposed for the HCV program, life-threatening deficiencies must be resolved before the HAP contract is executed and the family moves into the unit.

PHA Policy

If any ~~deficiencies~~ ~~HQS-violations~~ are identified, the owner will be notified of the deficiencies and be given a time frame to correct them. If requested by the owner, the time frame for correcting the deficiencies may be extended by the PHA for good cause. The PHA will reinspect the unit within five business days of the date the owner notifies the PHA that the required corrections have been made.

If the time period for correcting the deficiencies (or any PHA-approved extension) has elapsed, or the unit fails ~~HQS~~ at the time of the reinspection, OHA will notify the owner and the family that the unit has been rejected and that the family must search for another unit. OHA may agree to conduct a second reinspection, for good cause, at the request of the family and owner.

Following a failed reinspection, the family may submit a new Request for Tenancy Approval for the same unit after the owner has made repairs, if they are unable to locate another suitable unit.

Utilities

Generally, at initial lease-up the owner is responsible for demonstrating that all utilities are in working order including those utilities that the family will be responsible for paying.

PHA Policy

Utility service must be available for testing at the time of the initial inspection.

~~OHA will allow the utilities to be placed in service after the unit has met all other HQS requirements. OHA will reinspect the unit to confirm that utilities are operational before the HAP contract is executed by OHA.~~

Appliances ~~{Form HUD-52580}~~

PHA Policy

If the family is responsible for supplying the stove and/or refrigerator, the PHA will allow the stove and refrigerator to be placed in the unit after the unit has met all other ~~NSPIRE~~ ~~HQS~~ requirements. The required appliances must be in place before the HAP contract is executed by the PHA. The PHA will execute the HAP contract based upon a certification from the family that the appliances have been installed and are working. A confirmatory inspection will be scheduled within 30 days of HAP contract approval.

8-II.C. ANNUAL/BIENNIAL ~~HQS~~ INSPECTIONS [24 CFR 982.405 and 982.406; Notice PIH 2016-05]

Hud requires the PHA to inspect each unit under HAP contract at least biennially (or triennially for small, rural PHAs), to confirm that the unit still meets NSPIRE standards. The inspection may be conducted in conjunction with the family's annual reexamination but also may be conducted separately.

PHA Policy

Each unit under HAP contract must be inspected within 12 months of the last full ~~HQS~~ inspection. ~~The PHA reserves the right to require annual inspections of any unit or owner at any time.~~

The PHA will not rely on alternative inspection standards.

Scheduling the Inspection

PHA Policy

If an adult cannot be present on the scheduled date, the family should request that the PHA reschedule the inspection. The PHA and family will agree on a new inspection date that generally should take place within five business days of the originally scheduled date. The PHA may schedule an inspection more than five business days after the original date for good cause.

If the family misses the first scheduled appointment without requesting a new inspection date, the PHA will automatically schedule a second inspection. If the family misses two scheduled inspections without PHA approval, the PHA will consider the family to have violated its obligation to make the unit available for inspection. This may result in termination of the family's assistance in accordance with Chapter 12.

8-II.D. ~~INTERIM~~**SPECIAL** INSPECTIONS [24 CFR 982.405(~~dg~~)]

If a participant family or government official ~~notifies the PHA of a potential deficiency, the following applies:~~

- ~~• If the reported deficiency is life-threatening, the PHA must, within 24 hours of notification, both inspect the housing unit and notify the owner if the life-threatening deficiency is confirmed. The owner must then make the repairs within 24 hours of PHA notification.~~
- ~~• If the reported deficiency is non-life-threatening, the PHA must, within 15 days of notification, both inspect the unit and notify the owner if the deficiency is confirmed. The owner must then make the repairs within 30 days of notification from the PHA or within any PHA-approved extension.~~

~~reports a life-threatening condition which the owner would be required to repair within 24 hours, the PHA must inspect the unit within 24 hours of notification. If the reported condition is not life-threatening, the PHA must inspect the unit within 15 days of notification.~~

PHA Policy

During an ~~special-interim~~ inspection, the PHA generally will inspect only those deficiencies that were reported. However, the inspector will record any additional deficiencies that are observed and will require the responsible party to make the necessary repairs.

If the ~~annual/biennial/periodic~~ inspection has been scheduled or is due within 90 days of the date the ~~special-interim~~ inspection is scheduled the PHA may elect to conduct a full ~~annual/biennial~~ inspection.

8-II.E. SUPERVISORY QUALITY CONTROL INSPECTIONS [24 CFR 982.405(b); 24 CFR 985.3(e); HCV GB, p. 10-32]

HUD requires a PHA supervisor or other qualified person to conduct quality control inspections of a sample of units to ensure that each inspector is conducting accurate and complete inspections and that there is consistency in the application of the **NSPIRE standards HQS**.

The unit sample must include only units that have been inspected within the preceding three months. The selected sample should be drawn to represent a cross section of neighborhoods and the work of a cross section of inspectors.

8-II.F. INSPECTION RESULTS AND REINSPECTIONS FOR UNITS UNDER HAP CONTRACT

Correction Timeframes

Each deficiency is identified in the NSPIRE standards as either life-threatening, severe, moderate, or low.

For units under HAP contract, life-threatening deficiencies must be corrected within 24 hours after notice has been provided. All other non-life-threatening deficiencies (severe and moderate) must be corrected within 30 days (or a PHA-approved extension) after notice has been provided. If low deficiencies are present in a unit, these deficiencies result in a pass and would only be noted by the inspector for informational purposes.

The following is applicable to HAP contracts executed or renewed June 5, 2024, or earlier:

Notification of Corrective Actions

The owner and the family will be notified in writing of the results of all inspections. When an inspection identifies **HQS failures-deficiencies**, the PHA will determine (1) whether or not the failure is a life-threatening condition and (2) whether the family or owner is responsible.

PHA Policy

When life-threatening **deficiencies conditions** are identified, the PHA will immediately notify both parties by telephone or email. The notice will specify who is responsible for correcting the violation. The corrective actions must be taken within 24 hours of the PHA's notice.

When failures that are **not life-threatening severe or moderate** are identified, the PHA will send the owner and the family a written notification of the inspection results within five business days of the inspection. The written notice will specify who is responsible for correcting the violation, and the time frame within which the failure must be corrected. Generally, not more than 30 days will be allowed for the correction. **If low deficiencies are identified, these deficiencies will only be noted for informational purposes.**

The notice of inspection results will inform the owner that if life-threatening conditions are not corrected within 24 hours, and non-life threatening conditions are not corrected within the specified time frame (or any PHA-approved extension), the owner's HAP will be abated in accordance with the PHA's Policy (see 8-II.G.).

Likewise, in the case of family caused deficiencies, the notice will inform the family that if corrections are not made within the specified time frame (or any PHA-approved extension, if applicable) the family's assistance will be terminated in accordance with the PHA Policy (see Chapter 12).

The following is applicable to HAP contracts executed or renewed June 6, 2024, or later:

Notification of Corrective Actions [24 CFR 982.404(d)(1)]

The owner must maintain the unit in accordance with housing quality standards. The unit is in noncompliance with housing quality standards if:

- The PHA or authorized inspector determines the unit has housing quality standards deficiencies based upon an inspection
- The PHA notified the owner in writing of the unit housing quality standards deficiencies; and
- The unit's housing quality standards deficiencies are not corrected within the required timeframes.

A PHA may withhold assistance payments for units that have deficiencies once the owner has been notified in writing of the deficiencies. The PHA's administrative plan must identify the conditions under which the PHA will withhold HAP. In this case, if the unit is brought into compliance during the applicable cure period, the PHA must resume assistance payments and provide payments to cover the time period for which the payments were withheld.

The PHA must abate the HAP, including amounts that had been withheld, if the owner fails to make the repairs within the applicable cure period. The PHA must notify the family and the owner that it is abating payments and, if the unit does not meet housing quality standards within 60 days (or a reasonable longer period established by the PHA), the PHA will terminate the HAP contract for the unit and the family will have to move to receive continued assistance.

PHA Policy

The owner and the family will be notified in writing of the results of all inspections. When an inspection identifies housing quality standards failures, the PHA will determine (1) whether or not the failure is a life-threatening condition and (2) whether the family or owner is responsible.

The PHA will not withhold assistance payments upon notification of the deficiencies to the owner.

When life-threatening conditions are identified, the PHA will immediately notify both parties by telephone or email. The notice will specify who is responsible for correcting the violation. The corrective actions must be taken within 24 hours of the PHA's notice.

When failures that are not life-threatening are identified, the PHA will send the owner and the family a written notification of the inspection results within five business days of the inspection. The written notice will specify who is responsible for correcting the violation, and the time frame within which the failure must be corrected. Generally, not more than 30 days will be allowed for the correction.

If the owner is responsible for correcting the deficiency, the notice of inspection results will inform the owner that if life-threatening conditions are not corrected within 24 hours, and non-life-threatening conditions are not corrected within the specified time frame (or any PHA-approved extension), the owner's HAP will be abated in accordance with PHA policy (see 8-II.G.).

Likewise, if the family is responsible for correcting the deficiency, the notice will inform the family that if corrections are not made within the specified time frame (or any PHA-approved extension, if applicable) the family's assistance will be terminated in accordance with PHA policy (see Chapter 12).

Extensions

For ~~conditions that are life-threatening deficiencies~~, the PHA cannot grant an extension to the 24 hour corrective action period. For conditions that are ~~not life-threatening severe or moderate~~, the PHA may grant an exception to the required time frames for correcting the violation, if the PHA determines that an extension is appropriate ~~[24 CFR 982.404]~~.

PHA Policy

Extensions will be granted in cases where OHA has determined that the owner has made a good faith effort to correct the deficiencies and is unable to for reasons beyond the owner's control. Reasons may include, but are not limited to:

A repair cannot be completed because required parts or services are not available.

A repair cannot be completed because of weather conditions.

A reasonable accommodation is needed because the family includes a person with disabilities.

~~The length of the extension will be determined on a case-by-case basis, but will not exceed 60 days, except in the case of delays caused by weather conditions. In the case of weather conditions, extensions may be continued until the weather has improved sufficiently to make repairs possible. The necessary repairs must be made within 15 calendar days, once the weather conditions have subsided.~~

~~The length of the extension will be determined on a case-by-case basis, but will not exceed 60 days, except in the case of delays caused by weather conditions. In the case of weather conditions, extensions may be continued until the weather has improved sufficiently to make repairs possible. The necessary repairs must be made within 15 calendar days, once the weather conditions have subsided.~~

Reinspections [24 CFR 982.405(i)]

When a PHA must verify correction of a deficiency, the PHA may use verification methods other than another on-site inspection.

PHA Policy

The PHA will conduct a reinspection immediately following the end of the corrective period, or any PHA approved extension.

The family and owner will be given reasonable notice of the reinspection appointment. If the deficiencies have not been corrected by the time of the reinspection, the PHA will send a notice of abatement to the owner, or in the case of family caused violations, a notice of termination to the family, in accordance with PHA policies. If the PHA is unable to gain entry to the unit in order to conduct the scheduled reinspection, the PHA will consider the family to have violated its obligation to make the unit available for inspection. This may result in termination of the family's assistance in accordance with Chapter 12.

~~The PHA will on a case-by-case basis allow for the use of photos or other documentation of repairs rather than conducting a physical reinspection that deficiencies were corrected.~~

8-II.G. ENFORCING OWNER COMPLIANCE

If the owner fails to maintain the dwelling unit in accordance with **NSPIRE standards HQS**, OHA must take prompt and vigorous action to enforce the owner obligations.

The following is applicable to HAP contracts executed or renewed June 5, 2024, or earlier:

HAP Abatement

If an owner fails to correct **HQS** deficiencies by the time specified by the PHA, HUD requires the PHA to abate housing assistance payments no later than the first of the month following the specified correction period (including any approved extension) [24 CFR 985.3(f)]. No retroactive payments will be made to the owner for the period of time the rent was abated. Owner rents are not abated as a result of **deficiencies HQS failures** that are the family's responsibility.

PHA Policy

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).

The PHA will inspect abated units within seven business days of the owner's notification that the work has been completed. Payment will resume effective on the day the unit passes inspection.

During any abatement period the family continues to be responsible for its share of the rent. The owner must not seek payment from the family for abated amounts and may not use the abatement as cause for eviction.

HAP Contract Termination

The PHA must decide how long any abatement period will continue before the HAP contract will be terminated. The PHA should not terminate the contract until the family finds another unit, provided the family does so in a reasonable time [HCV GB p. 10-29] and must give the owner reasonable notice of the termination. The PHA will issue a voucher to permit the family to move to another unit as described in Chapter 10.

PHA Policy

The maximum length of time that HAP may be abated is 60 days. However, if the owner completes corrections and notifies the PHA before the termination date of the HAP contract, the PHA may rescind the termination notice if (1) the family still resides in the unit and wishes to remain in the unit and (2) the unit passes inspection.

Reasonable notice of HAP contract termination by the PHA is 30 days.

The following is applicable to HAP contracts executed or renewed June 6, 2024, or later:

HAP Withholding [24 CFR 982.404(d)(1)]

A PHA may withhold assistance payments for units that have housing quality standards deficiencies once the PHA has notified the owner in writing of the deficiencies. The PHA's administrative plan must identify the conditions under which the PHA will withhold HAP. In this case, if the unit is brought into compliance during the applicable cure period, the PHA resumes assistance payments and provides assistance payments to cover the time period for which the payments were withheld.

PHA Policy

The PHA will not withhold assistance payments upon notification to the owner of the deficiencies.

HAP Abatement [24 CFR 982.404(d)(2)]

The PHA must abate the HAP, including amounts that had been withheld, if the owner fails to make the repairs within the applicable cure period. In this case, the PHA must notify the family and the owner that it is abating payments and, if the unit does not meet housing quality standards within 60 days (or a reasonable longer period established by the PHA), the PHA will terminate the HAP contract for the unit and the family will have to move to receive continued assistance.

The owner may not terminate the tenancy of any family due to the withholding or abatement of assistance.

PHA Policy

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).

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 day the unit passes inspection.

During any abatement period the family continues to be responsible for its share of the rent.

For PHA policies on family moves when units are in abatement and termination of the HAP contract when a family moves due to deficiencies, see Section 10-I.B.

HAP Contract Termination

The PHA must decide how long any abatement period will continue before the HAP contract will be terminated. If the unit does not meet housing quality standards within 60 days (or a reasonable longer period established by the PHA), the PHA will terminate the HAP contract for the unit and the family will have to move to receive continued assistance. In this case, the PHA must issue the family its voucher to move at least 30 days prior to the termination of the HAP contract.

PHA Policy

The maximum length of time that HAP may be abated is 60 days. However, if the owner completes corrections and notifies the PHA before the termination date of the HAP contract, the PHA may rescind the termination notice if (1) the family still resides in the unit and wishes to remain in the unit and (2) the unit passes inspection.

Reasonable notice of HAP contract termination by the PHA is 30 days. The PHA will issue a voucher to permit the family to move to another unit as described in Chapter 10.

8-II.H. ENFORCING FAMILY COMPLIANCE [24 CFR 982.404(b)]

The following is applicable to HAP contracts executed or renewed June 5, 2024, or earlier:

Families are responsible for correcting any deficiencies listed in paragraph 8-I.D. If the family fails to correct a violation within the period allowed by the PHA (and any extensions), the PHA will terminate the family's assistance, according to the policies described in Chapter 12.

If the owner carries out a repair for which the family is responsible under the lease, the owner may bill the family for the cost of the repair.

The following is applicable to HAP contracts executed or renewed June 6, 2024, or later:

If the PHA waived the landlord responsibility for housing quality standards deficiencies that have been determined to have been caused by the tenant, any member of the household, or any guest or other person under the tenant's control, (see section 8-I.D), the family is responsible for correcting any housing quality standards violations listed in paragraph 8-I.D. If the family fails to correct a violation within the period allowed by the PHA (and any extensions), the PHA will terminate the family's assistance, according to the policies described in Chapter 12.

If the owner carries out a repair for which the family is responsible under the lease, the owner may bill the family for the cost of the repair and may enter into a repayment agreement with the family.

PART III: RENT REASONABLENESS [24 CFR 982.507]

8-III.A. OVERVIEW

Except in the case of certain LIHTC- and HOME-assisted units, no HAP contract can be approved until the PHA has determined that the rent for the unit is reasonable. The purpose of the rent reasonableness test is to ensure that a fair rent is paid for each unit rented under the HCV program.

HUD regulations define a reasonable rent as one that does not exceed the rent charged for comparable, unassisted units in the same market area. HUD also requires that owners not charge more for assisted units than for comparable units on the premises. This part explains the method used to determine whether a unit's rent is reasonable.

PHA-Owned Units [24 CFR 982.352(b)]

In cases where an HCV family is receiving assistance in a PHA-owned unit, the PHA must obtain the services of an independent entity to determine rent reasonableness in accordance with program requirements, and to assist the family in negotiating the contract rent when the family requests assistance. A PHA-owned unit is defined as a unit that is owned by the PHA that administers the assistance under the consolidated ACC (including a unit owned by an entity substantially controlled by the PHA). The independent agency must communicate the results of the rent reasonableness determination to the family and the PHA. The independent agency must be approved by HUD and may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government).

8-III.B. WHEN RENT REASONABLENESS DETERMINATIONS ARE REQUIRED

Owner-Initiated Rent Determinations

The PHA must make a rent reasonableness determination at initial occupancy and whenever the owner requests a rent adjustment.

The owner and family first negotiate the rent for a unit. The PHA (or independent agency in the case of PHA-owned units) will assist the family with the negotiations upon request. At initial occupancy the PHA must determine whether the proposed rent is reasonable before a HAP Contract is signed. The owner must not change the rent during the initial lease term. Subsequent requests for rent adjustments must be consistent with the lease between the owner and the family. Rent increases will not be approved unless any failed items identified by the most recent inspection have been corrected.

PHA Policy

After the initial occupancy period, the owner may request a rent adjustment in accordance with the owner's lease. For rent increase requests after initial lease-up, the PHA may request owners to provide information about the rents charged for other units on the premises, if the premises include more than 4 units. In evaluating the proposed rents in comparison to other units on the premises the PHA will consider unit size and length of tenancy in the other units.

The PHA will determine whether the requested increase is reasonable within 10 business days of receiving the request from the owner. The owner will be notified of the determination in writing.

All rents adjustments will be effective the first of the month following 60 days after the PHA's receipt of the owner's request or on the date specified by the owner, whichever is later.

PHA and HUD-Initiated Rent Reasonableness Determinations

HUD requires the PHA to make a determination of rent reasonableness (even if the owner has not requested a change) if there is a 10 percent decrease in the fair market rent that goes into effect at least 60 days before the contract anniversary date. HUD also may direct the PHA to make a determination at any other time. The PHA may decide that a new determination of rent reasonableness is needed at any time.

PHA Policy

In addition to the instances described above, the PHA will make a determination of rent reasonableness at any time after the initial occupancy period if: (1) the PHA determines that the initial rent reasonableness determination was in error or (2) the PHA determines that the information provided by the owner about the unit or other units on the same premises was incorrect.

LIHTC and HOME-Assisted Units [24 CFR 982.507(c)]

For units receiving low-income housing tax credits (LIHTCs) or units assisted under HUD's HOME Investment Partnerships (HOME) Program, a rent comparison with unassisted units is not required if the voucher rent does not exceed the rent for other LIHTC- or HOME-assisted units in the project that are not occupied by families with tenant-based assistance.

For LIHTCs, if the rent requested by the owner does exceed the LIHTC rents for non-voucher families, OHA must perform a rent comparability study in accordance with program regulations. In such cases, the rent shall not exceed the lesser of: (1) the reasonable rent as determined from the rent comparability study; or (2) the payment standard established by OHA for the unit size involved.

8-III.C. HOW COMPARABILITY IS ESTABLISHED

Factors to Consider

HUD requires PHAs to take into consideration the factors listed below when determining rent comparability. OHA may use these factors to make upward or downward adjustments to the rents of comparison units when the units are not identical to the HCV-assisted unit.

- Location and age
- Unit size including the number of rooms and square footage of rooms
- The type of unit including construction type (e.g., single family, duplex, garden, low-rise, high-rise)
- The quality of the units including the quality of the original construction, maintenance and improvements made
- Amenities, services, and utilities included in the rent

Units that Must Not Be Used as Comparables

Comparable units must represent unrestricted market rents. Therefore, units that receive some form of federal, state, or local assistance that imposes rent restrictions cannot be considered comparable units. These include units assisted by HUD through any of the following programs: Section 8 project-based assistance, Section 236 and Section 221(d)(3) Below Market Interest Rate (BMIR) projects, HOME or Community Development Block Grant (CDBG) program-assisted units in which the rents are subsidized; units subsidized through federal, state, or local tax credits; units subsidized by the Department of Agriculture rural housing programs, and units that are rent-controlled by local ordinance [Notice PIH 2002-22, Notice PIH 2005-20, and Notice PIH 2020-19].

Note: Notice PIH 2020-19, issued August 21, 2020, provides further guidance on the issue of what constitutes an assisted unit.

Rents Charged for Other Units on the Premises

The Request for Tenancy Approval (HUD-52517) requires owners to provide information, on the form itself, about the rent charged for other unassisted comparable units on the premises if the premises include more than 4 units.

By accepting the PHA payment each month the owner certifies that the rent is not more than the rent charged for comparable unassisted units on the premises. If asked to do so, the owner must give the PHA information regarding rents charged for other units on the premises.

8-III.D. PHA RENT REASONABLENESS METHODOLOGY

How Market Data Is Collected

PHA Policy

The PHA will utilize www.myhousingsearch.com which will collect and maintain data on market rents in the PHA's jurisdiction. Information sources include newspapers, realtors, market surveys, inquiries of owners and other available sources. The data will be maintained by bedroom size and market areas. Market areas may be defined by zip codes, ~~census tract, neighborhood, and identifiable natural or man-made boundaries~~. The data will be updated on an ongoing basis and rent information that is more than 12 months old will be ~~eliminated from the database—archived in~~ www.myhousingsearch.com. Market Rent Data greater than 12 months old will not be used for eligibility but may be used for reference.

How Rents Are Determined

PHA Policy

The rent for a unit proposed for HCV assistance will be compared to the rent charged for comparable units in the same market area. The PHA will develop a range of prices for comparable units by bedroom size within defined market areas. Units proposed for HCV assistance will be compared to the units within this rent range. Because units may be similar, but not exactly like the unit proposed for HCV assistance, the PHA may make adjustments to the range of prices to account for these differences.

The adjustment must reflect the local market. Not all differences in units require adjustments (e.g., the presence or absence of a garbage disposal may not affect the rent in some market areas).

The PHA uses a unit-to-unit comparison, by which the rent for a unit proposed for HCV assistance is directly compared to the rents for one or more unassisted units selected as comparable within the same market area. Geocoded maps will be used to identify the non-assisted units in closest proximity to the subject unit, and unit data information will be used to select the most similar units.

In comparing rents, the PHA will take into account critical market factors that impact on rent, including the location, quality, size, unit type, and age of the contract unit, as well as any amenities, housing services, maintenance, and utilities to be provided by the owner in accordance with the lease.

Where comparable units differ from the units proposed for HCV assistance, the PHA will determine whether those differences impact rent. Where they do, the PHA will adjust the rental value of the comparable units, up or down, based on the market value of these factors. The rent for the unit proposed for HCV assistance will be compared to the adjusted rents for the comparable units, enabling a fair, accurate, market-based determination of rent reasonableness.

Adjustments may vary by unit type (e.g., a second bathroom may be more valuable in a three-bedroom unit than in a two-bedroom).

The adjustment must reflect the rental value of the difference—not its construction costs (e.g., it might cost \$20,000 to put on a new roof, but the new roof might not make any difference in what a tenant would be willing to pay because rental units are presumed to have functioning roofs).

When a comparable project offers rent concessions (e.g., first month rent-free, or reduced rent) reported monthly rents will be adjusted accordingly. For example, if a comparable project reports rents of \$500/month but new tenants receive the first month's rent free, the actual rent for the unit would be calculated as follows: $\$500 \times 11 \text{ months} = 5500 / 12 \text{ months} = \text{actual monthly rent of } \$488$.

The PHA will notify the owner of the rent the PHA can approve based upon its analysis of rents for comparable units. The owner may submit information about other comparable units in the market area. The PHA will confirm the accuracy of the information provided and consider this additional information when making rent determinations. The owner must submit any additional information within ~~five~~ **ten** business days of the PHA's request for information or the owner's request to submit information.

EXHIBIT 8-1: AFFIRMATIVE HABITABILITY REQUIREMENTS

<u>Affirmative Habitability Requirements: Inside</u>

Must include at least 1 battery-operated or hard-wired smoke detector, in proper working condition, on each level of the property.

Must meet or exceed the carbon monoxide detection standards set by the Secretary through <i>Federal Register</i> notification.

Any outlet installed within 6 feet of a water source must be GFCI protected.

Must have a guardrail when there is an elevated walking surface with a drop off of 30 inches or greater measured vertically.

Must have permanently mounted light fixtures in any kitchens and each bathroom.

May not contain unvented space heaters that burn gas, oil, or kerosene.

<u>Affirmative Habitability Requirements: Outside</u>

Any outlet installed within 6 feet of a water source must be GFCI-protected.

Must have a guardrail when there is an elevated walking surface with a drop off of 30 inches or greater measured vertically.

<u>Affirmative Habitability Requirements: Unit</u>

Must have hot and cold running water in the bathroom and kitchen, including an adequate source of safe drinking water in the bathroom and kitchen.

Must include its own bathroom or sanitary facility that is in proper operating condition and usable in privacy. It must contain a sink, a bathtub or shower, and an interior flushable toilet.

Must include at least 1 battery-operated or hard-wired smoke detector, in proper working condition, in the following locations:

- | |
|---|
| <ul style="list-style-type: none"> • On each level of the unit AND • Inside each bedroom or sleeping area AND • Within 21 feet of any door to a bedroom measured along a path of travel AND • Where a smoke detector is installed outside a bedroom is separated from an adjacent living area <p style="padding-left: 40px;">by a door, a smoke detector must also be installed in the living areas side of the door.</p> |
|---|

If the unit is occupied by a hearing-impaired person, the smoke detectors must have an alarm system designed for hearing-impaired persons.

Must have a living room and a kitchen area with a sink, cooking appliance, refrigerator, food preparation areas and food storage area.

Must have two working outlets or one working outlet and one permanent light fixture within all habitable rooms.

Must have a permanently mounted light fixture in each bathroom and in the kitchen.

Any outlet installed within 6 feet of a water source must be GFCI protected.
Must have permanently installed heating source.
No units may contain unvented space heaters that burn gas, oil, or kerosene
Must have a guardrail when there is an elevated walking surface with a drop off of 30 inches or greater measured vertically.
Must have at least one bedroom or living/sleeping room for each two persons.

EXHIBIT 8-1: OVERVIEW OF HUD HOUSING QUALITY STANDARDS

Note: This document provides an overview of HQS. For more detailed information see the following documents:

- 24 CFR 982.401, Housing Quality Standards (HQS)
- Housing Choice Voucher Guidebook, Chapter 10.
- HUD Housing Inspection Manual for Section 8 Housing
- HUD Inspection Form, form HUD-52580 (3/01) and Inspection Checklist, form HUD-52580-A (9/00)

Sanitary Facilities

The dwelling unit must include sanitary facilities within the unit. The sanitary facilities must be usable in privacy and must be in proper operating condition and adequate for personal cleanliness and disposal of human waste.

Food Preparation and Refuse Disposal

The dwelling unit must have space and equipment suitable for the family to store, prepare, and serve food in a sanitary manner.

Space and Security

The dwelling unit must provide adequate space and security for the family. This includes having at least one bedroom or living/sleeping room for each two persons.

Thermal Environment

The unit must have a safe system for heating the dwelling unit. Air conditioning is not required but if provided must be in proper operating condition. The dwelling unit must not contain unvented room heaters that burn gas, oil, or kerosene. Portable electric room heaters or kitchen stoves with built-in heating units are not acceptable as a primary source of heat for units located in climatic areas where permanent heat systems are required.

Illumination and Electricity

Each room must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of occupants. The dwelling unit must have sufficient electrical sources so occupants can use essential electrical appliances. Minimum standards are set for different types of rooms. Once the minimum standards are met, the number, type and location of electrical sources are a matter of tenant preference.

Structure and Materials

The dwelling unit must be structurally sound. Handrails are required when four or more steps (risers) are present, and protective railings are required when porches, balconies, and stoops are thirty inches or more off the ground. The elevator servicing the unit must be working [if there is one]. Manufactured homes must have proper tie-down devices capable of surviving wind loads common to the area.

Interior Air Quality

~~The dwelling unit must be free of air pollutant levels that threaten the occupants' health. There must be adequate air circulation in the dwelling unit. Bathroom areas must have one openable window or other adequate ventilation. Any sleeping room must have at least one window. If a window was designed to be opened, it must be in proper working order.~~

Water Supply

~~The dwelling unit must be served by an approved public or private water supply that is sanitary and free from contamination. Plumbing fixtures and pipes must be free of leaks and threats to health and safety.~~

Lead-Based Paint

~~Lead-based paint requirements apply to dwelling units built prior to 1978 that are occupied or can be occupied by families with children under six years of age, excluding zero bedroom dwellings. Owners must:~~

- ~~• Disclose known lead-based paint hazards to prospective tenants before the lease is signed,~~
- ~~• provide all prospective families with "Protect Your Family from Lead in Your Home",~~
- ~~• Stabilize deteriorated painted surfaces and conduct hazard reduction activities within 30 days when identified by OHA~~
- ~~• Notify tenants each time such an activity is performed~~
- ~~• Conduct all work in accordance with HUD safe practices~~
- ~~• As part of ongoing maintenance ask each family to report deteriorated paint~~
- ~~• Maintain covered housing without deteriorated paint if there is child under six in the family~~

~~For units occupied by elevated blood lead level (lead poisoned) children under six years of age, an environmental investigation must be conducted (paid for by OHA). If lead hazards are identified during the environmental investigation, the owner must complete hazard reduction activities within 30 days.~~

~~See HCV GB p. 10-15 for a detailed description of these requirements. For additional information on lead-based paint requirements see 24 CFR 35, Subparts A, B, M, and R.~~

Access

~~Use and maintenance of the unit must be possible without unauthorized use of other private properties. The building must provide an alternate means of exit in case of fire.~~

Site and Neighborhood

~~The site and neighborhood must be reasonably free from disturbing noises and reverberations, excessive trash or vermin, or other dangers to the health, safety, and general welfare of the occupants.~~

Sanitary Condition

The dwelling unit and its equipment must be in sanitary condition and free of vermin and rodent infestation. The unit must have adequate barriers to prevent infestation.

Smoke Detectors

Smoke detectors must be installed in accordance with and meet the requirements of the National Fire Protection Association Standard (NFPA) 74 (or its successor standards). If the dwelling unit is occupied by any person with a hearing impairment, smoke detectors must have an appropriate alarm system as specified in NFPA 74 (or successor standards).

Hazards and Health/Safety

The unit, interior and exterior common areas accessible to the family, the site, and the surrounding neighborhood must be free of hazards to the family's health and safety.

EXHIBIT 8-2: SUMMARY OF TENANT PREFERENCE AREAS RELATED TO HOUSING QUALITY

Note: This document provides an overview of unit and site characteristics and conditions for which the family determines acceptability. For more detailed information see the following documents:

- Housing Choice Voucher Guidebook, Chapter 10.
- HUD Housing Inspection Manual for Section 8 Housing
- HUD Inspection Form, form HUD-52580 (3/01) and Inspection Checklist, form HUD-52580-A (9/00)

Provided the minimum housing quality standards have been met, HUD permits the family to determine whether the unit is acceptable with regard to the following characteristics:

- Sanitary Facilities.* The family may determine the adequacy of the cosmetic condition and quality of the sanitary facilities, including the size of the lavatory, tub, or shower; the location of the sanitary facilities within the unit; and the adequacy of the water heater.
- Food Preparation and Refuse Disposal.* The family selects size and type of equipment it finds acceptable. When the family is responsible for supplying cooking appliances, the family may choose to use a microwave oven in place of a conventional oven, stove, or range. When the owner is responsible for providing cooking appliances, the owner may offer a microwave oven in place of an oven, stove, or range only if other subsidized and unsubsidized units on the premises are furnished with microwave ovens only. The adequacy of the amount and type of storage space, the cosmetic conditions of all equipment, and the size and location of the kitchen are all determined by the family.
- Space and Security.* The family may determine the adequacy of room sizes and room locations. The family is also responsible for deciding the acceptability of the type of door and window locks.
- Energy conservation items.* The family may determine whether the amount of insulation, presence of absence of storm doors and windows and other energy conservation items are acceptable.
- Illumination and Electricity.* The family may determine whether the location and the number of outlets and fixtures (over and above those required to meet HQS standards) are acceptable or if the amount of electrical service is adequate for the use of appliances, computers, or stereo equipment.

- ~~(1) *Structure and Materials.* Families may determine whether minor defects, such as lack of paint, or worn flooring or carpeting will affect the livability of the unit.~~
 - ~~(2) *Indoor Air.* Families may determine whether window and door screens, filters, fans, or other devices for proper ventilation are adequate to meet the family's needs. However, if screens are present they must be in good condition.~~
 - ~~(3) *Sanitary Conditions.* The family determines whether the sanitary conditions in the unit, including minor infestations, are acceptable.~~
 - ~~(4) *Neighborhood conditions.* Families may determine whether neighborhood conditions such as the presence of drug activity, commercial enterprises, and convenience to shopping will affect the livability of the unit.~~
- ~~Families have no discretion with respect to lead-based paint standards and smoke detectors~~

Chapter 9

GENERAL LEASING POLICIES

INTRODUCTION

Chapter 9 covers the lease-up process from the ~~family's~~ family's submission of a Request for Tenancy Approval to execution of the HAP contract.

The Omaha Housing Authority (OHA) will be referred to as the Public Housing Authority (PHA) or simply as the PHA throughout the Administrative Plan.

In order for the PHA to assist a family in a particular dwelling unit, or execute a Housing Assistance Payments (HAP) contract with the owner of a dwelling unit, must determine that all the following program requirements are met:

- The unit itself must qualify as an eligible unit [24 CFR 982.305(a)]
- The unit must be inspected by the PHA and pass applicable housing quality standards [24 CFR 982.305(a)]
- ~~The unit must be inspected by the PHA and meet the National Standards for the Physical Inspection of Real Estate (NSPIRE) 982.305(a)]~~
- The lease offered by the owner must be approvable and must include the required Tenancy Addendum [24 CFR 982.305(a)]
- The rent to be charged by the owner for the unit must be reasonable [24 CFR 982.305(a)]
- The owner must be an eligible owner, approvable by the PHA, with no conflicts of interest [24 CFR 982.306]
- For families initially leasing a unit only: Where the gross rent of the unit exceeds the applicable payment standard for the family, the share of rent to be paid by the family cannot exceed 40 percent of the family's monthly adjusted income [24 CFR 982.305(a)]

9-I.A. TENANT SCREENING

The PHA has no liability or responsibility to the owner or other persons for the family's behavior or suitability for tenancy [24 CFR 982.307(a)(1)].

The PHA may elect to screen applicants for family behavior or suitability for tenancy. See Chapter 3 for a discussion of the PHA's policies with regard to screening applicant families for program eligibility [24 CFR 982.307(a)(1)].

The owner is responsible for screening and selection of the family to occupy the owner's unit. At or before PHA approval of the tenancy, the PHA must inform the owner that screening and selection for tenancy is the responsibility of the owner [24 CFR 982.307(a)(2)]. The PHA must also inform the owner or manager or their rights and obligations under the Violence against Women Act (VAWA) [24 CFR 5.2005(a)(2)].
~~must also inform the owner or manager or his/her rights and obligations under the Violence against Women Act of 2013 (VAWA) [24 CFR 5.2005(a)(2)].~~

The PHA must provide the owner with the family's current and prior address (as shown in the PHA records) and the name and address (if known to the PHA) of the landlord at the family's current and prior address [24 CFR 982.307(b)(1)].

The PHA is permitted, but not required, to offer the owner other information in the PHA's possession about the tenancy history or drug trafficking of family members [24 CFR 982.307(b)(2)].

The PHA's policy on providing information to the owner must be included in the family's briefing packet [24 CFR 982.307(b)(3)].

The PHA may not disclose to the owner any confidential information provided by the family in response to a PHA request for documentation of domestic violence, dating violence, sexual assault, ~~or~~ stalking, or human trafficking, except at the written request or with the written consent of the individual providing the documentation [see 24 CFR 5.2007(b)(4)].

PHA Policy

The PHA will not screen applicants for family behavior or suitability for tenancy.

The PHA will not provide additional screening information to the owner.

9-I.B. REQUESTING TENANCY APPROVAL [Form HUD-52517]

After the family is issued a voucher, the family must locate an eligible unit, with an owner or landlord willing to participate in the voucher program. Once a family finds a suitable unit and the owner is willing to lease the unit under the program, the owner and the family must request the PHA to approve the assisted tenancy in the selected unit.

The owner and the family must submit two documents to the PHA:

- Completed Request for Tenancy Approval (RTA) – Form HUD-52517
- Copy of the proposed lease, including the HUD-prescribed Tenancy Addendum – Form HUD-52641-A

The RTA contains important information about the rental unit selected by the family, including the unit address, number of bedrooms, structure type, year constructed, utilities included in the rent, and the requested beginning date of the lease, necessary for the PHA to determine whether to approve the assisted tenancy in this unit.

Owners must certify to the most recent amount of rent charged for the unit and provide an explanation for any difference between the prior rent and the proposed rent.

Owners must certify that they are not the parent, child, grandparent, grandchild, sister or brother of any member of the family, unless the PHA has granted a request for reasonable accommodation for a person with disabilities who is a member of the tenant household.

For units constructed prior to 1978, owners must either 1) certify that the unit, common areas, and exterior have been found to be free of lead-based paint by a certified inspector; or 2) attach a lead-based paint disclosure statement

Both the RTA and the proposed lease must be submitted no later than the expiration date stated on the voucher. [HCV GB p.8-15].

The PHA must identify in the administrative plan whether the family will be permitted to submit more than one RTA at a time [24 CFR 982.54(d)(25)].

PHA Policy

The RTA must be signed by both the family and the owner.

The owner may submit the RTA on behalf of the family.

Completed RTA (including the proposed dwelling lease) must be submitted as hard copies, in-person, by mail, or by email, ~~or by fax~~.

The family may not submit, and the PHA will not process, more than one ~~(1)~~ RTA at a time.

When the family submits the RTA the PHA will review the RTA for completeness.

If the RTA is incomplete (including lack of signature by family, owner, or both), or if the dwelling lease is not submitted with the RTA, the PHA will notify the family and the owner of the deficiencies.

Missing information and/or missing documents will only be accepted as hard copies, in-person, by mail, or by email, ~~or by fax~~. The PHA will not accept missing information over the phone.

When the family submits the RTA and proposed lease, the PHA will also review the terms of the RTA for consistency with the terms of the proposed lease.

If the terms of the RTA are not consistent with the terms of the proposed lease, the PHA will notify the family and the owner of the discrepancies.

Corrections to the terms of the RTA and/or the proposed lease will only be accepted as hard copies, in-person, by mail, or by email, ~~or by fax~~. The PHA will not accept corrections by phone.

Because of the time sensitive nature of the tenancy approval process, the PHA will attempt to communicate with the owner and family by phone, ~~fax~~, or email. The PHA will use mail when the parties cannot be reached by phone, ~~fax~~, or email.

9-I.C. OWNER PARTICIPATION

The PHA does not formally approve an owner to participate in the HCV program. However, there are a number of criteria where the PHA may deny approval of an assisted tenancy based on past owner behavior, conflict of interest, or other owner-related issues. There are also criteria for which the PHA must disapprove an owner. No owner has a right to participate in the HCV program [24 CFR 982.306(e)]

See Chapter 13 for a full discussion of owner qualification to participate in the HCV program

9-I.D. ELIGIBLE UNITS

There are a number of criteria that a dwelling unit must meet in order to be eligible for assistance under the voucher program. Generally, a voucher-holder family may choose any available rental dwelling unit on the market in the PHA's jurisdiction. This includes the dwelling unit they are currently occupying.

Ineligible Units [24 CFR 982.352(a)]

The PHA may not assist a unit under the voucher program if the unit is a public housing or Indian housing unit; a unit receiving project-based assistance under section 8 of the 1937 Act (42 U.S.C. 1437f); nursing homes, board and care homes, or facilities providing continual psychiatric, medical, or nursing services; college or other school dormitories; units on the grounds of penal, reformatory, medical, mental, and similar public or private institutions; a unit occupied by its owner or by a person with any interest in the unit.

PHA-Owned Units [24 CFR 982.352(b)]

PHA-owned units as defined in 24 CFR 982.4 ~~Otherwise, eligible units that are owned or substantially controlled by the PHA issuing the voucher~~ may also be leased in the voucher program. In order for a PHA-owned unit to be leased under the voucher program, the unit must not be ineligible housing and the PHA must inform the family, both orally and in writing, that the family has the right to select any eligible unit available for lease and that the family is free to select a PHA-owned unit without any pressure or steering by the PHA. The PHA must obtain the services of an independent entity to perform certain functions as described in 24 CFR 982.352(b)(v)(A).

PHA Policy

~~The PHA does not have any eligible PHA-owned units available for leasing under the voucher program.~~

The PHA has eligible PHA-owned units available for leasing under the voucher program.

The PHA will inform the family of this housing at the time of the briefing. The PHA will also inform the family, both orally and in writing, that the family has the right to select any eligible unit available for lease and that the family is free to select a PHA-owned unit without any pressure or steering by the PHA.

Special Housing Types [24 CFR 982 Subpart M]

HUD regulations permit, but do not generally require, the PHA to permit families to use voucher assistance in a number of special housing types in accordance with the specific requirements applicable to those programs. These special housing types include single room occupancy (SRO) housing, congregate housing, group home, shared housing, manufactured home space (where the family owns the manufactured home and leases only the space), cooperative housing and homeownership option. See Chapter 15 for specific information and policies on any of these housing types that the PHA has chosen to allow.

The regulations do require the PHA to permit use of any special housing type if needed as a reasonable accommodation so that the program is readily accessible to and usable by persons with disabilities.

Duplicative Assistance [24 CFR 982.352(c)]

A family may not receive the benefit of HCV tenant-based assistance while receiving the benefit of any of the following forms of other housing subsidy, for the same unit or for a different unit:

- Public or Indian housing assistance;
- Other Section 8 assistance (including other tenant-based assistance);
- Assistance under former Section 23 of the United States Housing Act of 1937 (before amendment by the Housing and Community Development Act of 1974);
- Section 101 rent supplements;
- Section 236 rental assistance payments;
- Tenant-based assistance under the HOME Program;
- Rental assistance payments under Section 521 of the Housing Act of 1949 (a program of the Rural Development Administration);
- Any local or State rent subsidy;
- Section 202 supportive housing for the elderly;
- Section 811 supportive housing for persons with disabilities; (11) Section 202 projects for non-elderly persons with disabilities (Section 162 assistance); or
- Any other duplicative federal, State, or local housing subsidy, as determined by HUD. For this purpose, 'housing subsidy' does not include the housing component of a welfare payment, a social security payment received by the family, or a rent reduction because of a tax credit.

~~Housing Quality Standards (HQS) NSPIRE Standards [24 CFR 982.305 and 24 CFR 982.401] Notice PIH 2023-28~~Initial Inspection

In order to be eligible, the dwelling unit must be in ~~decent, safe and sanitary~~ safe and habitable condition and pass applicable housing quality standards. ~~This determination is made using HUD's Housing Quality Standards (HQS) National Standards for the Physical Inspection of Real Estate (NSPIRE) and/or equivalent state or local standards approved by HUD. See Chapter 8 for a full discussion of the NSPIRE inspection~~ **HQS NSPIRE** standards, as well as the process for **HQS** inspection at initial lease-up.

In order to be eligible, the dwelling unit must be in safe and habitable condition and pass applicable housing quality standards. See Chapter 8 for a full discussion of inspection standards, as well as the process for inspection at initial lease-up.

Unit Size

In order to be eligible, the dwelling unit must be appropriate for the number of persons in the household. A family must be allowed to lease an otherwise acceptable dwelling unit with fewer bedrooms than the number of bedrooms stated on the voucher issued to the family, provided the unit meets the applicable ~~HQS~~ space requirements [24 CFR ~~982.402(d)~~ 5.703-(d)(5)]. The family must be allowed to lease an otherwise acceptable dwelling unit with more bedrooms than the number of bedrooms stated on the voucher issued to the family. See Chapter 5 for a full discussion of subsidy standards.

Rent Reasonableness [24 CFR 982.305 and 24 CFR 982.507]

In order to be eligible, the dwelling unit must have a reasonable rent. The rent must be reasonable in relation to comparable unassisted units in the area and must not be in excess of rents charged by the owner for comparable, unassisted units on the premises. See Chapter 8 for a full discussion of rent reasonableness and the rent reasonableness determination process.

Rent Burden [24 CFR 982.508]

Where a family is initially leasing a unit and the gross rent of the unit exceeds the applicable payment standard for the family, the family share cannot exceed 40 percent of the family's adjusted monthly income. The term "family share" refers to the amount the family pays toward rent and utilities. The gross rent for the unit minus the total housing assistance payment (HAP) for the unit equals the family share. See Chapter 6 for a discussion of calculation of gross rent, the use of payment standards, and calculation of family income, family share of rent and HAP.

9-I.E. LEASE AND TENANCY ADDENDUM

The family and the owner must execute a written dwelling lease agreement for the assisted unit. This written lease is a contract between the tenant family and the owner; the PHA is not a party to this contract.

The tenant must have legal capacity to enter a lease under State and local law. 'Legal capacity' means that the tenant is bound by the terms of the lease and may enforce the terms of the lease against the owner [24 CFR 982.308(a)]

Lease Form and Tenancy Addendum [24 CFR 982.308]

If the owner uses a standard lease form for rental to unassisted tenants in the locality or the premises, the lease must be in such standard form. If the owner does not use a standard lease form for rental to unassisted tenants, the owner may use another form of lease. The HAP contract prescribed by HUD contains the owner's certification that if the owner uses a standard lease form for rental to unassisted tenants, the lease for the assisted tenants is in such standard form.

All provisions in the HUD-required Tenancy Addendum must be added word-for-word to the owner's standard lease form. The Tenancy Addendum includes the HUD requirements for the tenancy. Because it is a part of the lease, the tenant shall have the right to enforce the Tenancy Addendum against the owner. If there is a conflict between the owner's lease and the Tenancy Addendum, the terms of the Tenancy Addendum shall prevail over any other provisions of the lease.

PHA Policy

The PHA does not provide a model or standard dwelling lease for owners to use in the HCV program.

Lease Information [24 CFR 982.308(d)]

The assisted dwelling lease must contain all of the required information as listed below:

- The names of the owner and the tenant:
- The unit rented (address, apartment number, and any other information needed to identify the contract unit)
- The term of the lease (initial term and any provisions for renewal)
- The amount of the monthly rent to owner
- A specification of what utilities and appliances are to be supplied by the owner, and what utilities and appliances are to be supplied by the family.

Term of Assisted Tenancy

The initial term of the assisted dwelling lease must be for at least one year [24 CFR 982.309]. The initial lease term is also stated in the HAP contract.

The HUD program regulations permit the PHA to approve a shorter initial lease term if certain conditions are met.

PHA Policy

The PHA will not approve an initial lease term of less than one (1) year.

During the initial term of the lease, the owner may not raise the rent to owner [24 CFR 982.309].

Any provisions for renewal of the dwelling lease will be stated in the dwelling lease [HCV Guidebook, pg. 8-22]. There are no HUD requirements regarding any renewal extension terms, except that they must be stated in the dwelling lease if they exist.

The PHA may execute the HAP contract even if there is less than one year remaining from the beginning of the initial lease term to the end of the last expiring funding increment under the consolidated ACC. [24 CFR 982.309(b)].

Security Deposit [24 CFR 982.313 (a) and (b)]

The owner may collect a security deposit from the tenant. The PHA may prohibit security deposits in excess of private market practice, or in excess of amounts charged by the owner to unassisted tenants. However, if the PHA chooses to do so, language to this effect must be added to Part A of the HAP contract [Form HUD-52641].

PHA Policy

~~The PHA will allow the owner to collect any security deposit amount the owner determines is appropriate. Therefore, no modifications to the HAP contract will be necessary.~~

The PHA prohibits the owner from collecting security deposits in excess of amounts charged by the owner to unassisted tenants. The security deposit cannot be more than one month's rent. The PHA will add this provision to Part A of the HAP contract, executed between the PHA and the owner.

Separate Non-Lease Agreements between Owner and Tenant

Owners may not demand or accept any rent payment from the family in excess of the rent to the owner as approved by the PHA minus the PHA's housing assistance payments to the owner

[24 _CFR 982.451(b)(4)].

The owner may not charge the tenant extra amounts for items customarily included in rent in the locality, or provided at no additional cost to unsubsidized tenants in the premises [24 CFR 982.510(c)].

PHA Policy

The PHA permits owners and families to execute separate, non-lease agreements for services, appliances (other than range and refrigerator) and other items that are not included in the lease.

Any items, appliances, or other services that are customarily provided to unassisted families as part of the dwelling lease with those families or are permanently installed in the dwelling unit must be included in the dwelling lease for the assisted family. These items, appliances or services cannot be placed under a separate non-lease agreement between the owner and family. Side payments for additional rent, or for items, appliances or services customarily provided to unassisted families as part of the dwelling lease for those families, are prohibited.

Any items, appliances, or other services that are not customarily provided to unassisted families as part of the dwelling lease with those families, are not permanently installed in the dwelling unit and where the family has the sole option of not utilizing the item, appliance, or service, may be included in a separate non-lease agreement between the owner and the family.

The family is not liable and cannot be held responsible under the terms of the assisted dwelling lease for any charges pursuant to a separate non-lease agreement between the owner and the family. Non-payment of any charges pursuant to a separate non-lease agreement between the owner and the family cannot be a cause for eviction or termination of tenancy under the terms of the assisted dwelling lease.

Separate non-lease agreements that involve additional items, appliances or other services may be considered amenities offered by the owner and may be taken into consideration when determining the reasonableness of the rent for the property.

PHA Review of Lease

The PHA will review the dwelling lease for compliance with all applicable requirements.

PHA Policy

If the dwelling lease is incomplete or incorrect, the PHA will notify the family and the owner of the deficiencies. Missing and corrected lease information will only be accepted as hard copies, in-person, by mail, or by email, ~~or by fax~~. The PHA will not accept missing and corrected information over the phone.

Because the initial leasing process is time-sensitive, the PHA will attempt to communicate with the owner and family by phone, ~~fax~~, or email. The PHA will use mail when the parties can't be reached by phone, ~~fax~~, or email.

The PHA is permitted, but is not required, to review the lease to determine if the lease complies with State and local law and is permitted to decline to approve the tenancy if the PHA determines that the lease does not comply with State or local law [24 CFR 982.308(c)]

PHA Policy

The PHA will not review the owner's lease for compliance with state/local law.

9-I.F. TENANCY APPROVAL [24 CFR 982.305]

After receiving the family's Request for Tenancy Approval, with proposed dwelling lease, the PHA must promptly notify the family and owner whether the assisted tenancy is approved.

Prior to approving the assisted tenancy and execution of a HAP contract, the PHA must ensure that all required actions and determinations, discussed in Part I of this chapter have been completed.

These actions include ensuring that the unit is eligible; the unit has been inspected by the PHA and meets ~~the Housing Quality Standards (HQS)~~ NSPIRE housing quality standards; the lease offered by the owner is approvable and includes the required Tenancy Addendum; the rent to be charged by the owner for the unit must be reasonable; where the family is initially leasing a unit and the gross rent of the unit exceeds the applicable payment standard for the family, the share of rent to be paid by the family does not exceed 40 percent of the family's monthly adjusted income [24 CFR 982.305(a)]; the owner is an eligible owner, not disapproved by the PHA, with no conflicts of interest [24 CFR 982.306]; the family and the owner have executed the lease, including the Tenancy Addendum, and the lead-based paint disclosure information [24 CFR 982.305(b)].

PHA Policy

The PHA will complete its determination within 10 business days of receiving all required information.

If the terms of the RTA/proposed lease are changed for any reason, including but not limited to negotiation with the PHA, the PHA will obtain corrected copies of the RTA and proposed lease, signed by the family and the owner.

Corrections to the RTA/proposed lease will only be accepted as hard copies, in-person, by mail, or by email, ~~or by fax~~. The PHA will not accept corrections over the phone.

If the PHA determines that the tenancy cannot be approved for any reason, the owner and the family will be notified in writing and given the opportunity to address any reasons for disapproval. The PHA will instruct the owner and family of the steps that are necessary to obtain approval of the tenancy.

Where the tenancy is not approvable because the unit is not approvable, the family must continue to search for eligible housing within the timeframe of the issued voucher.

If the tenancy is not approvable due to rent affordability or rent reasonableness, the PHA will attempt to negotiate the rent with the owner. If a new, approvable rent is negotiated, the tenancy will be approved. If the owner is not willing to negotiate an approvable rent, the family must continue to search for eligible housing within the timeframe of the issued voucher.

9-I.G. HAP CONTRACT EXECUTION [24 CFR 982.305]

The HAP contract is a written agreement between the PHA and the owner of the dwelling unit. Under the HAP contract, the PHA agrees to make housing assistance payments to the owner on behalf of the family, and the owner agrees to comply with all program requirements as stated in the HAP contract.

The HAP contract form is prescribed by HUD.

If the PHA has given approval for the family of the assisted tenancy, the owner and the PHA must execute the HAP contract.

The term of the HAP contract must be the same as the term of the lease [24 CFR 982.451(a)(2)].

The PHA is permitted to execute a HAP contract even if the funding currently available does not extend for the full term of the HAP contract.

The PHA must make a best effort to ensure that the HAP contract is executed before the beginning of the lease term. Regardless, the HAP contract must be executed no later than 60 calendar days from the beginning of the lease term. Any HAP contract executed after the 60-day period is void, and the PHA may not pay any housing assistance payment to the owner, unless there are extenuating circumstances that prevent or prevented the PHA from meeting the 60-day deadline—then the PHA may submit to the HUD field office a request for an extension no later than two weeks after the 60-day deadline.

The PHA may not pay any housing assistance payment to the owner until the HAP contract has been executed. If the HAP contract is executed during the period of 60 calendar days from the beginning of the lease term, the PHA will pay housing assistance payments after execution of the HAP contract (in accordance with the terms of the HAP contract), to cover the portion of the lease term before execution of the HAP contract (a maximum of 60 days).

Any HAP contract executed after the 60-day period is void, and the PHA may not pay any housing assistance payment to the owner.

PHA Policy

Owners who have not previously participated in the HCV program must attend a meeting with the PHA in which the terms of the Tenancy Addendum and the HAP contract will be explained. The PHA may waive this requirement on a case-by-case basis, if it determines that the owner is sufficiently familiar with the requirements and responsibilities under the HCV program.

The owner and the assisted family will execute the dwelling lease and the owner must provide a copy to the PHA. The PHA will ensure that both the owner and the assisted family receive copies of the dwelling lease.

The owner and the PHA will execute the HAP contract. 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.

As required under VAWA-~~2013~~, once the HAP contract and lease have been executed and the family has been admitted to the program, the PHA will notify 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).

See Chapter 13 for a discussion of the HAP contract and contract provisions.

9-I.H. CHANGES IN LEASE OR RENT [24 CFR 982.308]

If the tenant and the owner agree to any changes in the lease, such changes must be in writing, and the owner must immediately give the PHA a copy of such changes. The lease, including any changes, must remain in accordance with the requirements of this chapter.

Generally, PHA approval of tenancy and execution of a new HAP contract are not required for changes in the lease. However, under certain circumstances, the execution of a new lease and HAP contract are required. These circumstances include:

- Changes in lease requirements governing tenant or owner responsibilities for utilities or appliances
- Changes in lease provisions governing the term of the lease
- The family moves to a new unit, even if the unit is in the same building or complex

In these cases, if the HCV assistance is to continue, the family must submit a new Request for Tenancy Approval (RTA) along with a new dwelling lease containing the proposed changes. A new tenancy must then be approved in accordance with this chapter.

Where the owner is changing the amount of the rent to owner, the owner must notify the PHA at least 60 days before any such changes go into effect [24 CFR 982.308(g)(4)]. The PHA will agree to such an increase only if the amount of the rent to owner is considered reasonable according to the rent reasonableness standards discussed in Chapter 8. If the requested rent is not found to be reasonable, the owner must either reduce the requested rent increase, or terminate the tenancy in accordance with the terms of the lease.

No rent increase is permitted during the initial term of the lease [24 CFR 982.309(a)(3)].

PHA Policy

Where the owner is requesting a rent increase, the PHA will determine whether the requested increase is reasonable within 10 business days of receiving the request from the owner. The owner will be notified of the determination in writing.

Rent increases will go into effect on the first of the month following the 60-day period after the owner notifies the PHA of the rent change or on the date specified by the owner, whichever is later.



RESOLUTION NO. 2024 – 118
REVISIONS TO THE SECTION 8 HCV ADMINISTRATIVE PLAN

WHEREAS, the Housing Authority of the City of Omaha (OHA) seeks to make revisions to specific policies in the Administrative Plan for the Section 8 Housing Choice Voucher Program;

WHEREAS, the administrative plan Chapters 1 through 19 have been brought current with all recent HUD requirements and guidance;

WHEREAS, OHA staff recommends that the Board of Commissioners adopt the changes to the Administrative Plan for the Section 8 Housing Choice Voucher Program;

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Commissioners adopts the changes to the Administrative Plan for the Section 8 Housing Choice Voucher Program.

David Levy, Chairman
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Assistant Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the regular meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held December 19, 2024.

Joanie Balk, Secretary
Housing Authority of the City of Omaha

6.2.4. Resolution 2024-119 RAD Pine Tower

Memorandum



To: OHA Board of Commissioners

From: Brian Hansen, General Counsel

Date: December 19, 2024

Re: Submission of RAD/Section 18 Blend Application for Pine Tower

RECOMMENDATION:

The Housing Authority of the City of Omaha (OHA) staff recommends that the Board of Commissioners approve OHA's plans for repositioning of its Pine Tower public housing development and authorize submission of an application to HUD for RAD/Section 18 blend conversion of Pine Tower.

EXPLANATION:

OHA is reviewing its public housing portfolio to identify repositioning options that will help OHA improve the sustainability and physical condition of its properties. Wherever permitted under HUD rules (for example, scattered site units), OHA intends to convert units to project-based voucher assistance through HUD's Section 18 process, which provides a higher level of HUD subsidies. For other properties that OHA intends to retain long-term, OHA will consider RAD conversion. RAD conversions that include major renovations may be eligible for RAD/Section 18 blend—a combination of HUD's RAD program and the Section 18 options—which provides higher subsidies for a percent of units based on a HUD formula. OHA has contracted with a consultant firm, AH Forward, to guide us in our repositioning efforts and procured Brinshore Development to provide development services for RAD repositioning.

OHA repositioning plans for its towers include RAD conversion. OHA is beginning with Pine Tower. OHA's plans for Pine Tower include LIHTC-funded renovations. Because our plans include renovations that may be eligible for Section 18 approval, OHA intends to submit an application to HUD for RAD/Section 18 blend conversion of Pine Tower. Pine Tower conversion is projected for October-November 2025.

As background, HUD's RAD (Rental Assistance Demonstration) program is intended to assist public housing authorities in preserving public housing units that have been subject to decades of declining funding and deferred maintenance and capital improvements. Units converted to RAD are subsidized by HUD by long-term project-based contracts under Section 8 of the U.S. Housing Act. This project-based Section 8 funding will reduce the funding fluctuations of annual federal allocations to the public housing program. It also smooths shorter-term fluctuations related to changes in individual tenants' incomes. This conversion is anticipated to be partially financed through a 4% Low Income Housing Tax Credit award and OHA's affiliate, River City Housing, will participate in the tax credit partnership that will own the property. RAD conversions allow the property to access public and private funding sources while preserving the housing as affordable. A detailed financing plan will be presented to the Board prior to conversion. The RAD program also preserves many tenant rights provided under the public housing program. Additional information about Pine Tower & about RAD and RAD Section 18 blends is attached.

SPONSORS: Brian Hansen, General Counsel

RECOMMENDED BY: Joanie Poore, CEO

PINE TOWER

1500 Pine Street

No. Units	144	Floors	13
Property Type	Multifamily	Year Built	1965
Property Style	Apartment Residential & Commercial	Site Size	1.8 acres
	High Rise Elevator		



Unit Mix Information

Unit Description	Number of Units	Bedrooms	Size	Annual Occupancy
Total	144	All one bedrooms	440 square feet	Approx. 96%

Neighborhood

Pine Tower is located in the Little Bohemia Neighborhood south of downtown Omaha. The neighborhood is experiencing a trend of investment with renovations of existing residential and commercial and multiple new market rate apartment developments. The neighborhood is walkable to downtown and is on a bus route.



Omaha Housing Authority

1823 Harney Street ~ Omaha, NE 68102 ~ 402.444.6900 ~ www.ohauthority.org

To: Kellie Johnston Dorsey, Assistant Director, Housing and Community Development
From: Brian Hansen, General Counsel & Director of Real Estate Development
Date: December 6, 2024
RE: **RAD Repositioning Plans for OHA Towers**

OHA is reviewing its entire housing stock to identify repositioning options for our agency's long-term financial stability. Our purpose is to preserve and improve our affordable housing for low-income households in our community. OHA and the City of Omaha have worked together in OHA's repositioning and redevelopment planning and implementation, including OHA's CNI projects and family and scattered site developments. OHA is beginning repositioning plans for its public housing towers, namely RAD conversion. This will be a multi-year project.

OHA's Towers

OHA's public housing includes 10 high-rise tower developments with roughly 1,400 total units.

DEV #	DEV	ADDRESS	TOTAL UNITS
NE001000005	KAY JAY TOWER	4500 S 25th ST	118
NE001000006	EVANS TOWER	3600 N 24th ST	111
NE001000008	PARK SOUTH & PARK NORTH	1501-1601 PARK AVE	223
NE001000009	BENSON TOWER	5900 NW RADIAL HWY	144
NE001000010	PINE TOWER	1500 PINE ST	144
NE001000011	FLORENCE TOWER	5100 FLORENCE BLVD	107
NE001000012	HIGHLAND TOWER	2500 B ST	107
NE001000013	JACKSON TOWER	600 S 27th ST	208
NE001000014	UNDERWOOD TOWER	4850 UNDERWOOD AVE	105
NE001000015	CROWN TOWER	5904 HENNINGER DR	150

OHA's towers are predominantly efficiency and 1-bedroom units. (Roughly 35 units are 2-bedroom units.) OHA's towers primarily serve single-person households.

Four developments (Kay Jay, Evans, Underwood, and Crown) with 480 residential units are designated for elderly (age 62 or older) or near elderly (age 50-62). The other towers have no age restrictions.

All of OHA's towers were built decades ago, in the 1960s and 1970s. They have decades of deferred capital needs, which affects maintenance costs and the quality of our housing. OHA's long-term goal is to improve and preserve our towers, as feasible, because OHA's towers are a critical source of affordable housing for some of the most vulnerable households in our community.

OHA plans RAD conversions of our towers, as described below, which will stabilize funding and also will permit private financing. The ability to access private financing, as well as LIHTC-funded renovation options, is critical for OHA to make needed capital improvements to our towers for their long-term preservation in OHA's affordable housing stock.

What is RAD?

The public housing program has been underfunded by Congress for decades. It is estimated that the public housing program nationwide has roughly \$80 billion of capital needs. HUD established its Rental Assistance Demonstration (RAD) program to assist public housing agencies in addressing the capital needs and financial viability of public housing properties in order to preserve these affordable housing assets. I've attached a brief HUD overview of the RAD program. As a summary of some key points:

RAD is dedicated to preserving affordable housing long-term. RAD conversion makes it possible for a property to borrow funds to address capital needs. RAD conversion also stabilizes the amount of revenue per unit. Upon RAD conversion, units will be removed from the public housing program and converted to Section 8 funding according to a RAD-specified formula and under 20-year contracts to ensure continued affordability. HUD rules for the RAD program include specific resident rights and protections, including requirement that current residents may not be displaced as a result of RAD conversion; if renovations require temporary relocation, current residents have a right to return. RAD conversion will require HUD applications and approvals and must be conducted according to HUD requirements, including robust resident consultation requirements.

RAD/Section 18 Blends

HUD's RAD / Section 18 blend allows an agency to rehabilitate some units of a property under the RAD program and other units under HUD's Section 18 rules, depending on rehabilitation needs. Key features of the RAD/Section 18 blend are:

- For both RAD and Section 18, HUD will change the way it provides rental assistance to the property from public housing to a long-term Section 8 assistance contract. For OHA's high-rise properties, all units would be converted to the Section 8 project-based voucher program.
- Units that are converted via Section 18 are eligible to receive higher contract rents (i.e., more HUD funding) than units that are converted via RAD. Units converted under RAD are intended to be budget neutral, meaning the property will receive the same funding that was provided through the public housing program. The higher contract rents provided by Section 18 will support greater financing and long-term operations.
- The portion of units that can be converted under Section 18 is based on HUD's guidelines for "housing construction cost." For example, if the rehabilitation or construction cost for the units is less than 30 percent of HUD's housing construction cost, HUD would allow 20 percent of the units at a property to be converted via Section 18 (and receive the higher contract rents) and 80 percent to be converted via RAD. Similarly, if the rehabilitation or construction cost is 90 percent or more of HUD's housing construction cost, HUD would allow 60 percent of the units to be converted via Section 18 and 40 percent of the units to be converted via RAD.
- For a RAD/Section 18 blend, all residents (including Section 18 units) are entitled to the exact same resident rights that are required under the RAD program, including the right to return; there is no re-screening; monthly rent formulas will remain the same for most families; right to organize; rights to OHA grievance procedures; and right to move with a voucher after one year.
- If relocation is required, the agency will develop a Relocation Plan which will describe the resources that the PHA will provide to relocate displaced families (e.g., offer of comparable housing, payment of actual and reasonable expenses, and counseling).

OHA RAD Repositioning Actions for OHA's Towers

OHA's towers were built decades ago, in the 1960s and 1970s, and have significant capital needs. OHA wishes to improve its towers for long-term preservation as part of OHA's affordable housing stock, as feasible.

RAD conversion requires OHA to demonstrate that OHA can address current and projected capital needs over a 20-year term, with financing plans that demonstrate financial viability of capital improvements as well as operations. Ongoing operations and rental subsidies will be funded by HUD under a 20-year Section 8 PBV contract according to a RAD-specified formula. In some cases, capital improvements made prior to RAD conversion may be funded with HUD public housing Capital Fund Program allocations. More extensive renovations will require additional funds, namely LIHTC funding and/or private financing. OHA has contracted with Brinshore Development to serve as our co-developer for these capital improvement projects.

Ownership will be transferred to River City Housing, a 501(c)(3) nonprofit corporation created and controlled by OHA. LIHTC funding would involve a private ownership entity with an ownership structure that will include River City Housing.

RAD repositioning will require OHA to submit RAD applications to HUD for approval in accord with RAD requirements. In most cases, when properties require significant renovation, OHA anticipates that our repositioning actions will involve RAD/Section 18 blend applications to HUD.

Renovations may require temporary moves. HUD RAD requirements include residents' right to return. When renovations require relocation, OHA and Brinshore aim to conduct renovations in stages to minimize disruption for current residents, as feasible. If OHA's RAD conversion actions may require displacement of any household, OHA will provide relocation services in accord with RAD and HUD and other federal requirements. OHA has contracted with CVR Associates to coordinate relocation actions in accord with HUD and other federal requirements. CVR is a nationwide firm and also is contracted to handle relocation of OHA's CNI redevelopments.

OHA will review each property individually to identify and implement the best repositioning strategy. OHA does not have capacity to manage repositioning of all towers at once, and the need for LIHTC funding for capital improvements also limits the number and timing of projects that OHA can pursue. This will be a multi-year project. OHA is beginning with Pine Tower. For Pine Tower, OHA intends to submit an application to HUD for RAD/Section 18 blend conversion in December 2024 or January 2025. OHA will continue to pursue repositioning options for all of OHA's 10 towers, and OHA will continue to consult with the City as plans progress.

THE RENTAL ASSISTANCE DEMONSTRATION (RAD)

AN OVERVIEW

What is RAD?

RAD is an affordable housing preservation initiative developed in consultation with residents, public housing authorities (PHAs), property owners, lenders, investors, and many others. Through a RAD conversion, a property moves from its original regulatory platform to the project-based Section 8 platform. This act of regulatory conversion unleashes opportunities as the Section 8 platform provides for predictable, stable rental assistance; is flexible for owners; is well understood by lenders and investors; ensures long-term affordability for the residents; and increases resident choice. PHAs and other owners have flexibility in how they can achieve local affordable housing goals, provided they satisfy HUD's requirements, including preserving the affordable housing and protecting the residents.

RAD has two components – the first addressing conversion of public housing properties and the second governing conversion of properties from several much smaller affordable housing portfolios.

RAD for Public Housing (Component 1)

Public housing faces a massive capital needs backlog, plus significant modernization challenges. Under Section 8, the property has access to the new financing tools safely used by the rest of the affordable housing industry and, with the long-term Section 8 contract, the property is insulated from the Federal funding decisions impacting public housing. Public housing properties that convert through RAD remain perpetually affordable through long-term HAP contracts required to renew at each expiration and Use Agreements that preserves HUD's interest in the property. The property must be owned or controlled by a public or non-profit owner. Residents preserve the rights they had under the public housing program and gain a new right to request a tenant-based voucher after living at the property for a period.

Key Features of RAD	
	Properties must address 100% of their current capital needs , including repairing or replacing all building components that are broken or past their useful life.
	Every property must undergo an environmental review and must mitigate any issues to ensure residents are not exposed to hazardous substances.
	PHAs and owners must use the most energy or water efficient appliances that are economically feasible and must always use EnergyStar and WaterSense appliances.
	Every property must be brought into compliance with accessibility requirements, creating new housing options for people with mobility, hearing, or vision disabilities.
	PHAs and owners can transfer the assistance to lower poverty neighborhoods with access to better schools, jobs, transportation, services, and other amenities.
	PHAs and owners must notify and consult with residents prior to conversion.
	If construction requires relocation, every household has a right to return and may not be re-screened as they enter the Section 8 program. Any relocation must be conducted under the Uniform Relocation Act.
	The construction activity generated through RAD has generated hundreds of thousands of jobs , directly and indirectly, many of which are required to go towards assisted residents through "Section 3" requirements.
	All housing must be replaced , with allowance for limited reductions under certain circumstances.

PHAs have used RAD to:

- Secure over \$11.7 Billion in construction improvements across 1,380 properties.
 - Attract over \$13 for each dollar of public housing funds the PHAs have received from HUD.
 - Replace over 99% of the public housing units under new Section 8 contracts.
 - Place over 8,000 affordable housing units in neighborhoods that, on average, have a 23% lower poverty rate than the original public housing sites.
 - Ensure that all residents have the option to remain in or return to the property following conversion, with over 90% of residents choosing this option.
 - Modernize their organizations and consolidate their work onto fewer regulatory platforms.
- Over 250 PHAs have converted all the public housing in their portfolios. In three states (MD, TN and VT), over half of the public housing that existed in 2012 has converted through RAD.



Cincinnati Metropolitan Housing Authority's Sutter View RAD Conversion – Before and After

RAD for Other Multifamily Housing (Component 2)

RAD Component 2 currently covers five property portfolios. The preservation risks facing each of these portfolios are diverse, ranging from looming capital needs to the pending loss of affordability altogether. In addition, four of the portfolios were tiny (less than 15,000 units each) consuming significant HUD administrative and oversight resources.

The Rent Supplement and the Rental Assistance Payments portfolios have been fully converted, preserving over 27,000 deeply affordable units. These programs, experiments from the late 1960s and early 1970s, were predecessors of the Section 8 program. Rent Supp and RAP properties were at risk of converting to market rate uses and residents would not receive rental assistance.

The Moderate Rehabilitation and the McKinney Vento Mod Rehab Single Room Occupancy portfolios stem from the 1980s and 1990s and are subject to annual subsidy contract renewals. Lenders cannot readily underwrite the annual subsidy contracts, leaving the owners with limited ability to finance improvements. Roughly one-third of these units have been converted, the pace impacted by the participation of many small, limited capacity owners in the program.

The Section 202 Housing for the Elderly Project Rental Assistance Contract (202 PRACs) properties are dependent on increases in Federal appropriations to address their capital needs. With a RAD option, HUD can avoid a deferred maintenance crisis at these 125,000 units. Newly added to RAD, the first conversion occurred in late 2020 and over 10,000 units are in the pipeline.

Current Opportunities

The challenges facing these portfolios are not static and RAD's flexible structure allows HUD to respond to emerging issues and opportunities. Each year, HUD suggests improvements to the RAD statute, most recently to ensure residents maintain access to services, to shore up the long-term affordability of non-RAD units when RAD is combined with other public housing disposition authorities, and to extend RAD conversion authority to the Section 811 Housing for Persons with Disabilities portfolio.

RESOLUTION NO. 2024 - 119
SUBMISSION OF HUD RAD/SECTION 18 BLEND APPLICATION: PINE TOWER

WHEREAS, the Housing Authority of the City of Omaha (OHA) seeks to pursue repositioning options for the long-term sustainability and preservation as affordable housing of its public housing program property, Pine Tower, which is AMP NE001000010;

WHEREAS, the Rental Assistance Demonstration Program (RAD) of the United States Department of Housing and Urban Development (HUD) allows public housing properties to convert to a more stable and predictable funding platform with project-based Section 8 rental subsidy;

WHEREAS, RAD conversion allows for the use of other funding sources such as Low Income Housing Tax Credits (LIHTC), public or private debt, and grant funds for financing rehabilitation of the properties; and

WHEREAS, the OHA Board of Commissioners finds that it is in the long term best interest of OHA to pursue RAD conversion of selected public housing program properties, including Pine Tower, for preservation as affordable housing;

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves OHA plans for repositioning Pine Tower and further:

1. Authorizes the submission of the RAD/Section 18 Blend application by OHA to HUD for the conversion of the 143 Annual Contributions Contract units (144 total units) at Pine Tower using the Project-Based Voucher option;
2. Authorizes the CEO, Joanie Balk, to execute all required application and supporting documents including Form HUD-5260, and any follow-up documentation necessary to complete the proposed RAD/Section 18 Blend conversions; and
3. Appoints the CEO, Joanie Balk, to act as agent of the OHA to execute all necessary agreements and instruments for and on behalf of OHA to participate in the RAD program.

David Levy, Chair, OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held December 19, 2024.

Joanie Balk, Secretary

6.2.5. Resolution 2024-120 Ratify Eric Johnson Nomination to HIO Board

RESOLUTION NO. 2024 – 120
REAPPOINTMENT OF HIO BOARD MEMBER – ERIC JOHNSON

WHEREAS, Pursuant to the Housing in Omaha, Inc., (HIO) By-Laws, the Housing Authority of the City of Omaha (OHA) Board of Commissioners has authority to appoint members of the HIO Board of Directors; and

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Commissioners of the Housing Authority of the City of Omaha hereby reappoints Eric Johnson to the HIO Board of Directors.

David Levy, Chairman
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held December 19, 2024.

Joanie Balk, Secretary
Housing Authority of the City of Omaha

6.2.6. Resolution 2024-121 FY 2023 Audit



September 19, 2024

To the Board of Commissioners of the
Housing Authority of the City of Omaha:

We have audited the financial statements of the Housing Authority of the City of Omaha (the "Authority") as of and for the year ended December 31, 2023, and have issued our report thereon dated September 19, 2024. Professional standards require that we provide you with information about our responsibilities under generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance, as well as certain information related to the planned scope and timing of our audit. We have communicated such information in our engagement letter dated November 2, 2023. Professional standards also require that we communicate to you the following information related to our audit.

Significant Audit Matters

Qualitative Aspects of Accounting Practices

Management is responsible for the selection and use of appropriate accounting policies. The significant accounting policies used by the Authority are described in Note 1 to the financial statements. As described in Note 1, the Authority changed accounting policies by adopting GASB 96, Subscription-Based Information Technology Arrangements in 2023. We noted no transactions entered into by the Authority during the year for which there is a lack of authoritative guidance or consensus. All significant transactions have been recognized in the financial statements in the proper period.

Accounting estimates are an integral part of the financial statements and are based on management's knowledge and experience about past and current events and assumptions about future events. Certain accounting estimates are particularly sensitive because of their significance to the financial statements and because of the possibility that future events affecting them may differ significantly from those expected. The most sensitive estimates affecting the financial statements were:

Management's estimate of depreciation of fixed assets, allowance for uncollectable accounts, and accrued compensation, which is based on the life expectancies of the assets, the likelihood of collection of accounts receivable, and the compensated absences for which employees expect to be paid, respectively. We evaluated the key factors and assumptions used to develop the depreciation of fixed assets, allowance for doubtful accounts, and current and non-current portions of accrued compensated absences in determining that they are consistent with industry practices and, therefore, reasonable in relation to the financial statements taken as a whole.

Certain financial statement disclosures are particularly sensitive because of their significance to financial statement users. In this instance, there were no particularly sensitive financial statement disclosures.

The financial statement disclosures are neutral, consistent, and clear.

Difficulties Encountered in Performing the Audit

Other than as disclosed below in the internal control section of this letter, we encountered no significant difficulties in performing and completing our audit.

Corrected and Uncorrected Misstatements

Professional standards require us to accumulate all misstatements identified during the audit, other than those that are clearly trivial, and communicate them to the appropriate level of management. The following material misstatements detected as a result of audit procedures were corrected by management:

- Proper recording of cash
- Proper recording of accounts receivable
- Proper recording of construction in progress
- Proper recording of interprograms
- Proper recording of accrued interest payable
- Proper recording of other liabilities

Disagreements with Management

For purposes of this letter, a disagreement with management is a disagreement on a financial accounting, reporting, or auditing matter, whether or not resolved to our satisfaction, that could be significant to the financial statements or the auditors' report. We are pleased to report that no such disagreements arose during the course of our audit.

Management Representations

We have requested certain representations from management that are included in the management representation letter dated September 19, 2024.

Management Consultations with Other Independent Accountants

In some cases, management may decide to consult with other accountants about auditing and accounting matters, similar to obtaining a "second opinion" on certain situations. If a consultation involves application of an accounting principle to the Authority's financial statements or a determination of the type of auditors' opinion that may be expressed on those statements, our professional standards require the consulting accountant to check with us to determine that the consultant has all the relevant facts. To our knowledge, there were no such consultations with other accountants.

Other Audit Findings or Issues

We generally discuss a variety of matters, including the application of accounting principles and auditing standards, with management each year prior to retention as the Authority's auditors. However, these discussions occurred in the normal course of our professional relationship and our responses were not a condition to our retention.

Other Matters

With respect to the supplementary information accompanying the financial statements, we made certain inquiries of management and evaluated the form, content, and methods of preparing the information to determine that the information complies with U.S. generally accepted accounting principles, the method of preparing it has not changed from the prior period, and the information is appropriate and complete in relation to our audit of the financial statements. We compared and reconciled the supplementary information to the underlying accounting records used to prepare the financial statements or to the financial statements themselves.

We were engaged to report on the schedule of expenditures of federal awards and the financial data schedule which accompany the financial statements. With respect to the supplementary information accompanying the financial statements, we made certain inquiries of management and evaluated the form, content, and methods of preparing the information to determine that the information complies with U.S. generally accepted accounting principles, the method of preparing it has not changed from the prior period, and the information is appropriate and complete in relation to our audit of the financial statements. We compared and reconciled the supplementary information to the underlying accounting records used to prepare the financial statements or to the financial statements themselves.

Internal Control over Financial Reporting

In planning and performing our audit of the financial statements of the Authority as of and for the year ended December 31, 2023, in accordance with auditing standards generally accepted in the United States of America, we considered the Authority's internal control over financial reporting ("internal control") as a basis for designing audit

procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control.

Our consideration of internal control was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies and, therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as discussed below, we identified certain deficiencies in internal control that we consider to be material weaknesses.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies in internal control, such that there is a reasonable possibility that a material misstatement of the Authority's financial statements will not be prevented, or detected and corrected, on a timely basis. We consider the following deficiencies in the Authority's internal control to be material weaknesses:

- The Authority did not maintain adequate internal controls over financial reporting. Controls are not in place to ensure the Authority records and reports financial data reliably in accordance with generally accepted accounting principles.
- The Authority has not properly considered, designed, implemented, maintained and monitored a system of internal controls that reasonably assures the program is in compliance with eligibility. As a result, the Section 8 Housing Voucher Cluster is in material non-compliance with the compliance requirements of the program.

This information is intended solely for the use of the Board and management of the Authority and is not intended to be, and should not be, used by anyone other than these specified parties.

Very truly yours,

A handwritten signature in blue ink that reads "Novogradac & Company LLP".

NOVOGRADAC & COMPANY LLP

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA

**FINANCIAL STATEMENTS AND
SUPPLEMENTARY INFORMATION**

YEAR ENDED DECEMBER 31, 2023

**WITH
REPORT OF INDEPENDENT AUDITORS**

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
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REPORT OF INDEPENDENT AUDITORS

To the Board of Commissioners
Housing Authority of the City of Omaha, Nebraska:

Opinion

We have audited the accompanying financial statements of the Housing Authority of the City of Omaha, Nebraska (the "Authority") as of and for the year ended December 31, 2023, and the related notes to the financial statements, which collectively comprise the Authority's basic financial statements, as listed in the accompanying table of contents.

In our opinion, the financial statements referred to above present fairly, in all material respects, the net position of the Authority as of December 31, 2023, and the changes in its net position and its cash flows for the year then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinion

We conducted our audit in accordance with auditing standards generally accepted in the United States of America ("GAAS") and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Our responsibilities under those standards are further described in the Auditors' Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of the Authority and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America, and for the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about the Authority's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditors' Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' report that includes our opinion. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS and *Government Auditing Standards* will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS and *Government Auditing Standards*, we

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about the Authority's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings, and certain internal control-related matters that we identified during the audit.

Other Matters

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the management's discussion and analysis be presented to supplement the basic financial statements. Such information, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic, or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements, and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Other Information

Our audit was conducted for the purpose of forming an opinion on the financial statements that collectively comprise the Authority's basic financial statements. The schedule of expenditures of federal awards is presented for the purpose of additional analysis as required by Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* and is not a required part of the basic financial statements. The accompanying financial data schedule is also not a required part of the financial statements and is presented for the purposes of additional analysis as required by the U.S. Department of Housing and Urban Development.

Other Matters (continued)

Other Information (continued)

The schedule of expenditures of federal awards and the financial data schedule are the responsibility of management and were derived from and relate directly to the underlying accounting and other records used to prepare the financial statements. Such information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States of America. In our opinion, the schedule of expenditures of federal awards and financial data schedule are fairly stated, in all material respects, in relation to the basic financial statements as a whole.

Other Reporting Required by Government Auditing Standards

In accordance with *Government Auditing Standards*, we have also issued our report dated September 19, 2024 on our consideration of the Authority's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of that testing, and not to provide an opinion on internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the Authority's internal control over financial reporting and compliance.

Novogradac & Company LLP

September 19, 2024
Toms River, New Jersey

MANAGEMENT'S DISCUSSION AND ANALYSIS

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
MANAGEMENT’S DISCUSSION AND ANALYSIS
DECEMBER 31, 2023

The Housing Authority of the City of Omaha, Nebraska (the “Authority”) management discussion and analysis (“MD&A”) is designed to (a) assist the reader in focusing on significant financial issues, (b) provide an overview of the Authority’s financial activity, (c) identify changes in the Authority’s financial position (its ability to address the next and subsequent year challenges), and (d) identify individual fund issues or concerns. The focus of this MD&A is on the Primary Government of the Authority which includes all the financial activity of the Authority with the exception of its discretely presented component unit.

Since the MD&A is designed to focus on the current year’s activities, resulting changes and currently known facts, please read it in conjunction with the Authority’s financial statements.

OVERVIEW OF THE FINANCIAL STATEMENTS

The basic financial statements in this report are those of a special purpose governmental entity engaged in a business type of activity. The following statements are included:

- Statement of Net Position – presents information about the Authority’s assets, liabilities, and net position and is similar to a balance sheet. The Statement of Net Position reports all financial capital resources for the Authority. This statement is presented in the format where assets minus liabilities equals “Net Position”, which is equivalent to equity in a commercial enterprise. Assets and liabilities are presented in order of liquidity and are classified as “current” (convertible to cash or expected to be used up within one year), and “non-current”. Increases or decreases in net position will serve as a useful indicator of whether the financial position of the Authority is improving.
- Statement of Revenues, Expenses, and Changes in Net Position – reports the Authority’s revenues by source and type of its expenses by category to substantiate the change in net position for the fiscal year then ended.
- Statement of Cash Flows – discloses net cash provided by, or used for operating activities, investing activities, and non-capital financial activities, and capital and related financing activities.

Net Position is reported in three broad categories:

- Net Investment in Capital Assets: This component of net position consists of all capital assets, reduced by the outstanding balances of any bonds, mortgages, notes or other borrowings that are attributable to the acquisition, construction, or improvement of those assets.
- Restricted Net Position: This component of net position consists of restricted assets, when constraints are placed on the asset by creditors (such as debt covenants), grantors, contributors, laws, regulations, etc.
- Unrestricted Net Position: Consists of net position that do not meet the definition of “Net Investment in Capital Assets”, or “Restricted Net Position”.

**HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
MANAGEMENT'S DISCUSSION AND ANALYSIS
DECEMBER 31, 2023**

OVERVIEW OF THE FINANCIAL STATEMENTS (CONTINUED)

Notes to the Financial Statements

The notes to the financial statements provide additional information that is essential to a full understanding of the data provided in the Authority-wide financial statements.

FUND FINANCIAL STATEMENTS

Traditional users of governmental financial statements will find the fund financial statements presentation more familiar. The focus is now on major funds, rather than fund types. The Authority consists of exclusively enterprise funds. Enterprise funds utilize the full accrual basis of accounting. The enterprise method of accounting is similar to accounting utilized by business in the private sector. All of the activities of the Authority are reported in a single enterprise fund.

THE AUTHORITY'S PROGRAMS

To fully understand the financial statements of the Authority, one must start with an understanding of what the Authority actually does. The following is a brief description of the programs and services that the Authority provides for the residents of Omaha.

Public and Indian Housing

The Public and Indian Housing Program is designed to provide low-cost housing. Under this program, HUD provides funding via an annual contributions contract. These funds, combined with the rental income received from tenants, are available solely to meet the operating expenses of the program.

Section 8 Housing Choice Vouchers Program

The Authority administers a program of rental assistance payments to private owners on behalf of eligible low-income families under Section 8 of the Housing and Urban Development Act of 1974. The program provides payments covering the difference between the maximum rent on a dwelling unit, as approved by HUD, and the amount of rent contribution by a participating family.

Public Housing Capital Fund Program

The purpose of the Capital Fund Program is to provide another source of funding to cover the cost of physical and management improvements and rehabilitation on existing low-income housing and improving the central office facilities. Funding for this program is provided by grants from HUD.

Business Activities

The Authority owns non-federal housing units and various interests in low income housing tax credit partnerships. Revenues earned from these activities are recorded in the Business Activities fund.

**HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
MANAGEMENT'S DISCUSSION AND ANALYSIS
DECEMBER 31, 2023**

THE AUTHORITY'S PROGRAMS (continued)

PIH Family Self Sufficiency Program

The purpose of the Family Self-Sufficiency Program is to promote the development of local strategies to coordinate the use of assistance under the Housing Choice Voucher and Public Housing programs with public and private resources to enable participating families to increase earned income and financial literacy, reduce or eliminate the need for welfare assistance, and make progress toward economic independence and self-sufficiency.

Home Investment Partnership Program

The purpose of the Home Investment Partnership Program is to expand the supply of affordable housing, particularly rental housing, for low and very low income Americans; to strengthen the abilities of State and local governments to design and implement strategies for achieving adequate supplies of decent, affordable housing; and to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and nonprofit organizations, in the production and operation of affordable housing.

Resident Opportunity and Supportive Services - Service Coordinators Program

The purpose of the ROSS Service Coordinator program is to provide funding to hire and maintain Service Coordinators who will assess the needs of residents of conventional Public Housing or Indian housing and coordinate available resources in the community to meet those needs. This program works to promote the development of local strategies to coordinate the use of assistance under the Public Housing program with public and private resources, for supportive services and resident empowerment activities. These services should enable participating families to increase earned income, reduce or eliminate the need for welfare assistance, make progress toward achieving economic independence and housing self-sufficiency, or, in the case of elderly or disabled residents, help improve living conditions and enable residents to age-in-place.

Mainstream Vouchers Program

The Authority administers a program of rental assistance payments to private owners on behalf of eligible low-income families whose head of household has a disability. The program provides payments covering the difference between the maximum rent on a dwelling unit, as approved by HUD, and the amount of rent contribution by a participating household.

Central Office Cost Center

The Central Office Cost Center ("COCC") is mandated by HUD to account for "centralized" services and functions necessary to the Authority's operations. Funding for the COCC is in the form of fees charged to other Authority programs and activities as well as to affiliate entities. The fees charged include those specified by HUD as management fees, bookkeeping fees, asset management fees and other fees for service. HUD regulates which and how fees may be charged to HUD programs.

Lower Income Housing Assistance Program - Section 8 Modification Rehabilitation

The purpose of the Lower Income Housing Assistance Program - Section 8 Modification Rehabilitation is to aid low- and very low-income families in obtaining decent, safe, and sanitary rental housing through the provision of housing assistance payments to participating owners on behalf of eligible tenants.

**HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
MANAGEMENT'S DISCUSSION AND ANALYSIS
DECEMBER 31, 2023**

THE AUTHORITY'S PROGRAMS (continued)

Choice Neighborhood Implementation Grant

The objective of the Choice Neighborhood Implementation Grant is to support the development of comprehensive neighborhood Transformation Plans. The Transformation Plan should integrate effective strategies to implement public and/or assisted housing revitalization, the coordination and design of supportive services, including educational opportunities for children, and neighborhood-level planning to improve a range of neighborhood assets. The Transformation Plan should be created as part of a collaborative planning process that involves neighborhood stakeholders and local governmental entities to build the necessary support to successfully implement the plan.

Emergency Housing Vouchers Program

During the year ended December 31, 2021, the Authority was awarded Emergency Housing Vouchers. These funds are to be used to assist individuals and families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability.

Choice Neighborhood Planning Grant

The objective of the Choice Neighborhood Planning grant is to support the development of comprehensive neighborhood revitalization plans which focused on directing resources to address three core goals: Housing, People and Neighborhoods. To achieve these core goals, communities must develop and implement a comprehensive neighborhood revitalization strategy, or Transformation Plan. The Transformation Plan will become the guiding document for the revitalization of the public and/or assisted housing units while simultaneously directing the transformation of the surrounding neighborhood and positive outcomes for families.

FINANCIAL HIGHLIGHTS

Total Assets for FY 2022 were \$50,220,963 and for FY 2023 the amount was \$50,553,778. This represents an overall net decrease of \$306,407 or 0.6%.

Capital Assets (net) decreased from \$32,529,203 in FY 2022 to \$32,308,384 in FY 2023, or by \$220,819 or 0.7%. The decrease is the net amount of depreciation expense in FY 2023 of \$3,149,000 and capital asset additions of \$2,989,485.

Current liabilities increased from \$2,090,436 in FY 2022 to \$2,544,040 in FY 2023 or by \$453,604 or 21.7%. The increase is primarily due to increases in the prepaid tenant rent.

Non-current liabilities increased from \$3,706,152 in FY 2022 to \$3,912,741 in FY 2023 or by \$206,589 or 5.6%.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
MANAGEMENT'S DISCUSSION AND ANALYSIS
DECEMBER 31, 2023

ANALYSIS OF ENTITY-WIDE ASSETS & LIABILITIES (STATEMENT OF NET POSITION)

The table below illustrates our analysis:

	<u>2023</u>	<u>2022</u>	<u>Net Change</u>	<u>Percent Variance</u>
Cash & Cash Equivalents	\$ 7,053,061	\$ 6,345,758	\$ 707,303	11.1%
Other Current Assets	2,766,349	2,792,897	(26,548)	-1.0%
Other Non-Current Assets	8,093,169	8,859,512	(766,343)	-8.6%
Net Capital Assets	<u>32,308,384</u>	<u>32,529,203</u>	<u>(220,819)</u>	-0.7%
Total Assets	<u>\$ 50,220,963</u>	<u>\$ 50,527,370</u>	<u>\$ (306,407)</u>	-0.6%
Current Liabilities	\$ 2,544,040	\$ 2,090,436	\$ 453,604	21.7%
Non Current Liabilities	3,912,741	3,706,152	206,589	5.6%
Deferred Inflow of Resources	<u>2,241,157</u>	<u>2,446,908</u>	<u>(205,751)</u>	-8.4%
Total Liabilities and Deferred Inflows	<u>8,697,938</u>	<u>2,446,908</u>	<u>6,251,030</u>	255.5%
Net Investment in Capital Assets	29,969,319	30,113,313	(143,994)	-0.5%
Restricted Net Position	4,429,543	4,716,695	(287,152)	-6.1%
Unrestricted Net Position	<u>7,124,163</u>	<u>7,453,866</u>	<u>(329,703)</u>	4.4%
Total Net Position/Liabilities/Equity	<u>\$ 50,220,963</u>	<u>\$ 50,527,370</u>	<u>\$ (306,407)</u>	-0.6%

ANALYSIS OF CAPITAL ASSET ACTIVITY

The table below illustrates the changes in Capital Assets throughout the fiscal year:

	<u>2023</u>	<u>2022</u>	<u>Net Change</u>	<u>Percent Variances</u>
Land	\$ 8,278,584	\$ 8,278,584	\$ -	0.0%
Buildings	206,695,165	204,627,633	2,067,532	1.0%
Furniture, Equip., & Mach.	7,724,489	7,118,263	606,226	8.5%
Construction in Process	<u>1,022,592</u>	<u>807,011</u>	<u>215,581</u>	26.7%
Total Fixed Assets	<u>223,720,830</u>	<u>220,831,491</u>	<u>2,889,339</u>	1.3%
Accumulated Depreciation	<u>(191,412,446)</u>	<u>(188,302,288)</u>	<u>(3,110,158)</u>	1.7%
Net Fixed Assets	<u>\$ 32,308,384</u>	<u>\$ 32,529,203</u>	<u>\$ (220,819)</u>	-0.7%

In fiscal year 2023, the Authority acquired capital assets in the amount of \$2,989,485 from outside vendors which in total, were offset by an annual depreciation increase of \$3,149,000, yielding a decrease in net capital assets of \$220,819 or 0.7%.

Note 5 summarizes the activity of all of capital assets.

**HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
MANAGEMENT'S DISCUSSION AND ANALYSIS
DECEMBER 31, 2023**

ANALYSIS OF LONG-TERM DEBT

The Authority's long-term debt at December 31, 2023 and 2022 amounted to \$2.3 million and \$2.4 million, respectively, a decrease of approximately 0.1%. The decrease was due to annual principal payments.

ANALYSIS OF ENTITY-WIDE REVENUES

The Authority administers the following programs and the revenues generated from these programs during Fiscal Year Ended 2023 were as follows:

Program	Revenues Generated	
Section 8 Housing Choice Vouchers (HCV)	\$	41,390,885
Emergency Housing Vouchers		1,221,227
Public and Indian Housing (LIPIH)		17,288,667
Public Housing Capital Fund (CPF)		7,792,279
Choice Neighborhood Implementation Grant		869,875
Mainstream Vouchers (MV)		791,148
HOME Investment Partnership Program		193,420
Resident Opportunities and Self-Sufficiency Program (ROSS)		272,106
PIH Family Self-Sufficiency Program		426,972
Lower Income HAP - Section 8 Moderate Rehabilitation		546,513
Component Unit Blended		1,583,903
Business Activities		431,745
OOOC		657,830
Total Revenue	\$	73,466,570

Total revenues for FY 2022 were \$73,301,478 as compared to \$73,466,570 of total revenues for FY 2023. Comparatively, FY 2023 revenues decreased in relation to FY 2022 revenues by \$165,092.

ANALYSIS OF ENTITY-WIDE EXPENSES

The table below illustrates our analysis:

	<u>2023</u>	<u>2022</u>	<u>Net Change</u>	<u>Percent Variances</u>
Administrative	\$ 11,609,969	\$ 10,705,860	\$ 904,109	8.4%
Tenant Services	710,395	506,827	203,568	40.2%
Utilities	3,400,492	3,159,649	240,843	7.6%
Maintenance	12,469,204	12,233,476	235,728	1.9%
Protective Services	717,730	716,969	761	0.1%
Insurance and General Expense	2,374,344	2,034,417	339,927	16.7%
Housing Assistance Payments	39,724,615	38,164,959	1,559,656	4.1%
Depreciation Expense	3,149,000	3,142,437	6,563	0.2%
Total Expenses	\$ 74,155,749	\$ 70,664,594	\$ 3,491,155	4.9%

**HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
MANAGEMENT’S DISCUSSION AND ANALYSIS
DECEMBER 31, 2023**

Administrative expenditures for FY 2022 were \$10,705,860 as compared to \$11,609,969 in FY 2023. This represents an increase of \$904,109 or 8.4%. The increase was caused by turnover in the Authority in the prior year.

Maintenance expenditures for FY 2023 were \$12,469,204 as compared to \$12,233,476 in FY 2022, an increase of \$235,728 or 1.9%. This increase is primarily due to the Authority entering into several new repairs and maintenance contracts during the audit period.

Housing assistance payments for FY 2023 were \$39,724,615 as compared to \$38,164,959 in FY 2022, an increase of \$1,559,656 or 4.1%. This is primarily due to an increase in the average HAP payment paid to landlords during FY 2023.

Depreciation Expense for FY 2023 was \$3,149,000 as compared to \$3,142,437 in FY 2022, an increase of \$6,563 or 0.2%. This increase was due to the purchase of several assets during the audit period.

FINANCIAL CONTACT

The financial report is designed to provide a general overview of the Authority’s finances for all those with an interest. Questions concerning any of the information provided in this report or request for additional information should be addressed to Ashley Hatheway, Chief Financial Officer of the Housing Authority of the City of Omaha, Nebraska.

FINANCIAL STATEMENTS

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
STATEMENT OF NET POSITION
AS OF DECEMBER 31, 2023

ASSETS

Current assets:

Cash and cash equivalents	\$ 7,053,061
Tenant security deposits	656,271
Accounts receivable, net	1,576,054
Prepaid expenses	314,363
Assets held for sale	<u>20,560</u>

Total current assets	<u>9,620,309</u>

Non-current assets:

Restricted cash	5,390,869
Leases receivable, net of current portion	2,864,252
Other assets	37,149
Capital assets, net	<u>32,308,384</u>

Total non-current assets	<u>40,600,654</u>

Total assets	<u><u>\$ 50,220,963</u></u>

See accompanying notes to financial statements.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
STATEMENT OF NET POSITION (continued)
AS OF DECEMBER 31, 2023

LIABILITIES

Current liabilities:	
Accounts payable	\$ 719,936
Accrued expenses	187,165
Tenant security deposits	656,271
Unearned revenue	619,218
Loans payable, current	48,168
Other current liabilities	<u>313,282</u>
Total current liabilities	<u>2,544,040</u>
Non-current liabilities:	
Accrued compensated absences, non-current	719,803
Loans payable, non-current	2,290,897
Other non-current liabilities	<u>902,041</u>
Total non-current liabilities	<u>3,912,741</u>
Total liabilities	<u>6,456,781</u>

DEFERRED INFLOWS OF RESOURCES

Deferred inflows - cell tower leases	<u>2,241,157</u>
Total deferred inflows of resources	<u>2,241,157</u>

NET POSITION

Net position:	
Net investment in capital assets	29,969,319
Restricted	4,429,543
Unrestricted	<u>7,124,163</u>
Total net position	<u>41,523,025</u>
Total liabilities, deferred inflows of resources, and net position	<u>\$ 50,220,963</u>

See accompanying notes to financial statements.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
STATEMENT OF REVENUES, EXPENSES
AND CHANGES IN NET POSITION
FOR THE YEAR ENDED DECEMBER 31, 2023

Operating revenues:	
Tenant revenue	\$ 9,028,534
HUD operating grants	59,332,832
Other government grants	1,049,211
Other revenues	<u>1,362,587</u>
Total operating revenues	<u>70,773,164</u>
Operating expenses:	
Administrative	11,609,969
Tenant services	710,395
Utilities	3,400,492
Ordinary repairs and maintenance	12,469,204
Protective services	717,730
Insurance	1,459,243
General expenses	915,101
Housing assistance payments	39,724,615
Depreciation	<u>3,149,000</u>
Total operating expenses	<u>74,155,749</u>
Operating loss	<u>(3,382,585)</u>
Non-operating revenues (expenses):	
Investment income	263,174
Interest expense	(71,670)
Gain on sale of fixed assets	<u>488,881</u>
Net non-operating revenues	<u>680,385</u>
Loss before capital grants and transfers	(2,702,200)
Capital grants	<u>1,941,351</u>
Change in net position	(760,849)
Net position, beginning of year	<u>42,283,874</u>
Net position, end of year	<u>\$ 41,523,025</u>

See accompanying notes to financial statements.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
STATEMENT OF CASH FLOWS
FOR THE YEAR ENDED DECEMBER 31, 2023

Cash Flows from Operating Activities:	
Cash received from grantors	\$ 60,569,062
Cash received from tenants	10,332,748
Cash paid to suppliers	(58,396,326)
Cash paid to employees	<u>(11,633,919)</u>
Net cash provided by operating activities	<u>871,565</u>
Cash Flows from Capital and Related Financing Activities:	
Principal payments on long term debt	(76,825)
Interest paid on long term debt	(71,670)
Proceeds from capital grants	1,941,351
Purchase of capital assets	(2,989,485)
Proceeds from sale of capital assets	<u>517,000</u>
Net cash used in capital and related financing activities	<u>(679,629)</u>
Cash Flows from Investing Activities:	
Interest received on leases	115,178
Interest received on notes receivable	<u>147,996</u>
Net cash provided by investing activities	<u>263,174</u>
Net increase in cash, cash equivalents, and restricted cash	455,110
Cash, cash equivalents, and restricted cash, beginning of year	<u>12,645,091</u>
Cash, cash equivalents, and restricted cash, end of year	<u><u>\$ 13,100,201</u></u>
A reconciliation of cash, cash equivalents, and restricted cash to the Statement of Net Position is as follows:	
Cash and cash equivalents	\$ 7,053,061
Tenant security deposits	656,271
Restricted cash	<u>5,390,869</u>
Total cash, cash equivalents, and restricted cash	<u><u>\$ 13,100,201</u></u>

See accompanying notes to financial statements.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
STATEMENT OF CASH FLOWS (continued)
FOR THE YEAR ENDED DECEMBER 31, 2023

Reconciliation of operating loss to net cash
provided by operating activities:

Operating loss	\$ (3,382,585)

Adjustments to reconcile operating loss to net cash
provided by operating activities:

Depreciation	3,149,000
Bad debt - tenants	568,526

Changes in assets and liabilities:

Accounts receivable - HUD and other government	392,770
Accounts receivable - tenants and other	(895,417)
Prepaid expenses	6,010
Lease receivable	187,957
Other assets	314,037
Accounts payable	249,196
Accrued compensated absences	125,583
Accrued expenses	(57,135)
Tenant security deposits	1,555
Unearned revenue	300,148
Deferred inflows of resources	(205,751)
Other current liabilities	143,552
Other liabilities	<u>(25,881)</u>

Net cash provided by operating activities	\$ <u><u>871,565</u></u>

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

A. Organization

The Housing Authority of the City of Omaha, Nebraska (the "Authority") is a governmental, public corporation created under federal and state housing laws for the purpose of engaging in the development, acquisition and administrative activities of the low-income housing program and other programs with similar objectives for low and moderate income families residing in the City of Omaha, Nebraska (the "City"). The Authority is responsible for operating certain low-rent housing programs in the City under programs administered by the U.S. Department of Housing and Urban Development ("HUD"). These programs provide housing for eligible families under the United States Housing Act of 1937, as amended.

The Authority is governed by a board of seven members who serve five year terms. The governing board is essentially autonomous but responsible to HUD. An Executive Director is appointed by the Authority's board of commissioners to manage the day-to-day operations of the Authority.

B. Basis of Accounting / Financial Statement Presentation

The Authority's financial statements are prepared in accordance with accounting principles generally accepted in the United States of America ("GAAP"). The Governmental Accounting Standards Board ("GASB") is responsible for establishing GAAP for state and local governments through its pronouncements (Statements and Interpretations).

The programs of the Authority are organized as separate accounting entities. Each program is accounted for by a separate set of self-balancing accounts that comprise its assets, deferred outflows of resources, liabilities, deferred inflows of resources, net position (program equity), revenues, and expenses. The individual programs account for the governmental resources allocated to them for the purpose of carrying on specific programs in accordance with laws, regulations, or other restrictions, including those imposed by HUD. The programs of the Authority are combined and considered an enterprise fund. An enterprise fund is used to account for activities that are operated in a manner similar to those found in the private sector.

The Authority's enterprise fund is accounted for using the economic resources measurement focus and the accrual basis of accounting. Revenues, expenses, gains, and losses from assets and liabilities resulting from exchange and exchange-like transactions are recognized when the exchange takes place.

The Authority's financial statements are prepared in accordance with GASB 34, *Basic Financial Statements and Management's Discussion and Analysis for State and Local Governments* ("GASB 34"), as amended. GASB 34 requires the basic financial statements to be prepared using the economic resources measurement focus and the accrual basis of accounting and requires the presentation of a Statement of Net Position, a Statement of Revenues, Expenses and Changes in Net Position and Statement of Cash Flows. GASB 34 also requires the Authority to include management's discussion and analysis as part of the Required Supplemental Information.

The Authority's primary source of non-exchange revenue relates to grants and subsidies. In accordance with GASB 33, *Accounting and Financial Reporting for Non-exchange Transactions*, ("GASB 33") grant and subsidy revenue are recognized at the time eligible program expenditures occur and/or the Authority has complied with the grant and subsidy requirements.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

B. Basis of Accounting / Financial Statement Presentation (continued)

On January 30, 2008, HUD issued *PIH Notice 2008-9* which requires that unused housing assistance payments ("HAP") under proprietary fund reporting should be reported as restricted net position, with the associated cash and investments also being reported on HUD's Financial Data Schedule ("FDS") as restricted. Any unused administrative fees should be reported as unrestricted net position, with the associated assets being reported on the FDS as unrestricted.

Both administrative fee and HAP revenue continue to be recognized under the guidelines set forth in GASB 33. Accordingly, both the time and purpose restrictions as defined by GASB 33 are met when these funds are available and measurable, not when these funds are expended. The Housing Choice Vouchers program is no longer a cost reimbursement grant; therefore, the Authority recognizes unspent administrative fee and HAP revenue in the reporting period as revenue for financial statement reporting.

In accordance with 2 CFR 200.305(b)(9), any investment income earned up to \$500 on these funds may be retained by the Authority. Amounts in excess of \$500 must be remitted annually to the Department of Health and Human Services, Payment Management System.

Effective January 1, 2023, the Authority adopted GASB Statement No.96, *Subscription-Based Information Technology Arrangements* ("GASB 96"). GASB 96 improves the financial reporting by establishing a definition for subscription-based information technology arrangements ("SBITA") and providing uniform guidance for accounting and financial reporting for transactions that meet the definition of SBITA. For the year ended December 31, 2023, the adoption of GASB 96 did not have a material effect on the financial statements of the Authority.

Funds

The accounts of the Authority are organized and operated on the basis of funds. A fund is an independent fiscal and accounting entity with a self-balancing set of accounts. Fund accounting segregates funds according to their intended purpose and is used to aid management in demonstrating compliance with finance-related legal and contractual provisions. The minimum number of funds is maintained consistent with legal and managerial requirements. The Authority maintains the following type of proprietary fund:

Enterprise Fund – The Authority's operations are presented as a single enterprise fund. The transactions for each of the programs of the Authority are accounted for in separate funds for internal purposes and grant requirements and combined into one enterprise fund for external financial reporting.

Measurement Focus and Basis of Accounting

Proprietary funds distinguish operating revenues and expenses from non-operating items. Operating revenues and expenses generally result from providing services and producing and delivering goods in connection with proprietary funds' principal ongoing operations. The principal operating revenues of the Authority's funds are rent and maintenance charges to residents, operating grants and subsidies from HUD, and administration fees earned.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

B. Basis of Accounting / Financial Statement Presentation (continued)

Measurement Focus and Basis of Accounting (continued)

Operating expenses for proprietary funds include the administrative costs of providing services to residents and the housing assistance payments to residents. All revenues and expenses not meeting this definition are reported as non-operating revenues and expenses.

C. Reporting Entity

In accordance with GASB 61, *The Financial Reporting Entity Omnibus - An Amendment of GASB Statement No. 14 and No. 34*, ("GASB 61") the Authority's basic financial statements include those of the Authority and any component units. Component units are legally separate, tax-exempt organizations whose majority of officials are appointed by the primary government or the organization is fiscally dependent on the primary government and there is a potential for those organizations either to provide specific financial benefits to, or impose specific financial burdens on, the primary government. An organization has a financial benefit or burden relationship with the primary government if any one of the following conditions exist:

1. The primary government (Authority) is legally entitled to or can otherwise access the organization's resources.
2. The primary government is legally obligated or has otherwise assumed the obligation to finance the deficits of, or provide financial support to, the organization.
3. The primary government is obligated in some manner for the debt of the organization.

Based upon the application of these criteria, this report includes blended component units.

The Authority's blended component units are, although legally separate entities, in substance part of the Authority's operations and so data from these units are combined with data of the primary government and reflected in the Statement of Net Position, Statement of Revenues, Expenses and Changes in Net Position and Statement of Cash Flows. As of December 31, 2023, the Authority's blended component units consisted of the following:

- Housing in Omaha, Inc
- Omaha Crown Limited Partnership I
- Omaha Crown Limited Partnership II
- Strehlow Housing Partners Limited Partnership
- North Omaha Affordable Housing Limited Partnership
- 1613 Farnam Street Limited Liability Company
- 1234 South 13th Street Limited Liability Company
- Securities Building Limited Partnership
- Keystone Crown I, LP

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

D. Description of Programs

The Authority maintains its accounting records by program. A summary of the significant programs operated by the Authority is as follows:

Public and Indian Housing Program

The Public and Indian Housing Program is designed to provide low-cost housing. Under this program, HUD provides funding via an annual contributions contract. These funds, combined with the rental income received from tenants, are available solely to meet the operating expenses of the program.

Section 8 Housing Choice Vouchers

The Authority administers a program of rental assistance payments to private owners on behalf of eligible low-income families under Section 8 of the Housing and Urban Development Act of 1974. The program provides payments covering the difference between the maximum rent on a dwelling unit, as approved by HUD, and the amount of rent contribution by a participating family.

Public Housing Capital Fund

The purpose of the Capital Fund Program is to provide another source of funding to cover the cost of physical and management improvements and rehabilitation on existing low-income housing and improving the central office facilities. Funding for this program is provided by grants from HUD.

Resident Opportunity and Supportive Services Program / Service Coordinators ("ROSS")

The purpose of the ROSS Service Coordinator program is to provide funding to hire and maintain Service Coordinators who will assess the needs of residents of conventional Public Housing or Indian housing and coordinate available resources in the community to meet those needs. This program works to promote the development of local strategies to coordinate the use of assistance under the Public Housing program with public and private resources, for supportive services and resident empowerment activities. These services should enable participating families to increase earned income, reduce or eliminate the need for welfare assistance, make progress toward achieving economic independence and housing self-sufficiency or, in the case of elderly or disabled residents, help improve living conditions and enable residents to age-in-place.

Business Activities

The Authority owns non-federal housing units and various interests in low income housing tax credit partnerships. Revenues earned from these activities are recorded in the Business Activities fund.

PIH Family Self Sufficiency Program

The purpose of the Family Self-Sufficiency Program is to promote the development of local strategies to coordinate the use of assistance under the Housing Choice Voucher and Public Housing programs with public and private resources to enable participating families to increase earned income and financial literacy, reduce or eliminate the need for welfare assistance, and make progress toward economic independence and self-sufficiency.

Home Investment Partnership Program

The purpose of the Home Investment Partnership Program is to expand the supply of affordable housing, particularly rental housing, for low and very low income Americans; to strengthen the abilities of state and local governments to design and implement strategies for achieving adequate supplies of decent, affordable housing; and to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and nonprofit organizations, in the production and operation of affordable housing.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

D. Description of Programs (continued)

Mainstream Vouchers Program

The Authority administers a program of rental assistance payments to private owners on behalf of eligible low-income families whose head of household has a disability. The program provides payments covering the difference between the maximum rent on a dwelling unit, as approved by HUD, and the amount of rent contribution by a participating household.

Central Office Cost Center

The Central Office Cost Center ("COCC") is mandated by HUD to account for "centralized" services and functions necessary to the Authority's operations. Funding for the COCC is in the form of fees charged to other Authority programs and activities as well as to affiliate entities. The fees charged include those specified by HUD as management fees, bookkeeping fees, asset management fees and other fees for service. HUD regulates which and how fees may be charged to HUD programs.

Lower Income Housing Assistance Program - Section 8 Modification Rehabilitation

The purpose of the Lower Income Housing Assistance Program - Section 8 Modification Rehabilitation is to aid low- and very low-income families in obtaining decent, safe, and sanitary rental housing through the provision of housing assistance payments to participating owners on behalf of eligible tenants.

Choice Neighborhood Implementation Grant

The objective of the Choice Neighborhood Implementation Grant is to support the development of comprehensive neighborhood Transformation Plans. The Transformation Plan should integrate effective strategies to implement public and/or assisted housing revitalization, the coordination and design of supportive services, including educational opportunities for children, and neighborhood-level planning to improve a range of neighborhood assets. The Transformation Plan should be created as part of a collaborative planning process that involves neighborhood stakeholders and local governmental entities to build the necessary support to successfully implement the plan.

Emergency Housing Vouchers Program

During the year ended December 31, 2023, the Authority was awarded Emergency Housing Vouchers. These funds are to be used to assist individuals and families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability.

Choice Neighborhood Planning Grant

The objective of the Choice Neighborhood Planning grant is to support the development of comprehensive neighborhood revitalization plans which focused on directing resources to address three core goals: Housing, People and Neighborhoods. To achieve these core goals, communities must develop and implement a comprehensive neighborhood revitalization strategy, or Transformation Plan. The Transformation Plan will become the guiding document for the revitalization of the public and/or assisted housing units while simultaneously directing the transformation of the surrounding neighborhood and positive outcomes for families.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

E. Use of Management Estimates

The preparation of financial statements in accordance with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect certain reported amounts of assets and liabilities, and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. Significant estimates include the allowance for doubtful accounts, accrued expenses and other liabilities, depreciable lives of properties and equipment and contingencies. Actual results could differ significantly from these estimates.

F. Cash and Cash Equivalents

HUD requires housing authorities to invest excess funds in obligations of the United States, certificates of deposit or any other federally insured investment.

HUD also requires that deposits be fully collateralized at all times. Acceptable collateralization includes FDIC insurance and the market value of securities purchased and pledged to the political subdivision. Pursuant to HUD restrictions, obligations of the United States are allowed as security for deposits. Obligations furnished as security must be held by the Authority or with an unaffiliated bank or trust company for the account of the Authority.

For the statement of cash flows, cash and cash equivalents include all cash balances and highly liquid investments with a maturity of three months or less at time of purchase. It is the Authority's policy to maintain collateralization in accordance with HUD requirements.

G. Accounts Receivable, Net

Rents are due from tenants on the first day of each month. As a result, tenants' accounts receivable balances primarily consist of rents past due and vacated tenants. Also included in accounts receivable are those amounts that tenants owe the Authority as payment for committing fraud or misrepresentation. These charges usually consist of retroactive rent and other amounts that may be determined by a formal written agreement or by a court order. An allowance for doubtful accounts is established to provide for all accounts, which may not be collected in the future for any reason.

The Authority recognizes a receivable from HUD and other governmental agencies for amounts billed but not received and for amounts unbilled but earned as of year-end.

H. Allowance for Doubtful Accounts

The Authority periodically reviews all accounts receivable to determine the amount, if any, that may be uncollectable. If it is determined that an account or accounts may be uncollectable, the Authority prepares an analysis of such accounts and records an appropriate allowance against such amounts.

I. Prepaid Expenses

Prepaid expenses represent amounts paid as of year-end that will benefit future operations.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

J. Notes Receivable

The Authority has utilized development funds in accordance with HUD guidelines to assist in the construction and redevelopment of affordable housing developments through the issuance of mortgage notes. When preparing financial statements in accordance with GAAP, management is required to make estimates as to the collectability of such mortgage notes. When estimating collectability, management analyzes the value of the underlying mortgaged property, the property's ability to generate positive cash flow, and current economic trends and conditions. Management utilizes these estimates and judgments in connection with establishing an allowance for uncollectable amounts during an accounting period.

K. Lease Receivable

Lease receivables are recognized at the net present value of the leased assets at a borrowing rate either explicitly described in the lease agreement or implicitly determined by the Authority.

L. Capital Assets, Net

Capital assets are stated at cost. Expenditures for repairs and maintenance are charged directly to expense as they are incurred. Expenditures determined to represent additions or betterments are capitalized. Depreciation is calculated using the straight-line method based on the estimated useful lives of the following asset groups:

• Buildings	5 - 27.5 Years
• Furniture and Equipment	5 - 15 Years
• Site Improvements	7 - 27.5 Years

The Authority has established a capitalization threshold of \$5,000.

M. Impairment of Long Lived Assets

The Authority evaluates events or changes in circumstances affecting long-lived assets to determine whether an impairment of its assets has occurred. If the Authority determines that a capital asset is impaired, and that impairment is significant and other-than-temporary, then an impairment loss will be recorded in the Authority's financial statements. For the year ended December 31, 2023, no impairment losses were recognized.

N. Inter-Program Receivables and Payables

Inter-program receivables and payables are all classified as either current assets or current liabilities and are the result of the use of a concentrated account depository as the common paymaster for most of the programs of the Authority. Cash settlements are made monthly. All inter-program balances are reconciled, and inter-program receivables and payables balances net to zero. In accordance with GASB 34, inter-program receivables and payables are eliminated for financial statement purposes. Detail balances by program are found in the Financial Data Schedule of this report.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

O. Accounts Payable and Accrued Liabilities

The Authority recognizes a liability for goods and services received but not paid for as of year-end. It also recognizes a liability for wages and fringe benefits related to services performed at year-end but not yet paid to employees or taxing authorities.

P. Unearned Revenue

The Authority's unearned revenue primarily consists of the prepayment of rent by residents and the receipt of HUD and other grant funding applicable to future periods prior to incurring the corresponding expense.

Q. Accrued Compensated Absences

Compensated absences are those absences for which employees will be paid in accordance with the Authority's Personnel Policy. A liability for compensated absences that are attributable to services already rendered and that are not contingent on a specific event that is outside the control of the Authority and its employees, is accrued as employees earn the rights to the benefits. Compensated absences that relate to future services or that are contingent on a specific event that is outside the control of the Authority and its employees are accounted for in the period in which such services are rendered or in which such event takes place.

R. Deferred Inflows of Resources

In addition to liabilities, the Statement of Net Position will sometimes report a separate section for deferred inflows of resources. This separate financial statement element represents an acquisition of net position that applies to a future period and so will not be recognized as an inflow of resources until that time.

S. Net Position Classifications

Net position is displayed in three components:

Net investment in capital assets - Consists of capital assets including restricted capital assets, net of accumulated depreciation and reduced by the outstanding balances of any bonds, mortgages, notes, or other borrowings that are attributable to the acquisition, construction or improvement of those assets.

Restricted net position - Consists of resources with constraints placed on the use either by (1) external groups such as creditors, grantors, contributors, laws or regulations of other governments; or (2) law through constitutional provisions or enabling legislation.

Unrestricted net position - All other resources that do not meet the definition of "restricted" or "net investment in capital assets."

T. Use of Restricted Assets

When both restricted and unrestricted resources are available for a particular restricted use, it is the Authority's policy to use restricted resources first, and then unrestricted resources as needed.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 1. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES (continued)

U. Operating Revenues and Expenses

The Authority defines its operating revenues as income derived from charges to residents and others for services provided as well as government subsidies and grants used for operating purposes. The Authority receives annual operating subsidies from HUD, subject to limitations prescribed by HUD. Operating subsidies from HUD are recorded when received and are accounted for as revenue. Other contributions from HUD that are for development and modernization of capital assets are reflected separately in the accompanying financial statements as capital grants. Operating expenses are costs incurred in the operation of its program activities to provide services to residents and others. The Authority classifies all other revenues and expenses as non-operating.

V. Taxes

The Authority is a unit of local government under Nebraska law and is exempt from real estate, sales and income taxes.

W. Budgets and Budgetary Accounting

The Authority adopts annual, appropriated operating budgets for all its programs receiving federal expenditure awards and are used as a management tool throughout the accounting cycle. All budgets are prepared on a HUD basis, which differs with accounting principles generally accepted in the United States of America. All appropriations lapse at HUD's program year end or at the end of grant periods.

X. Regulated Leases

The Authority is a lessor of residential dwelling units under regulated leases as defined by GASB 87 and as such recognizes rental revenue in accordance with the terms of the lease contract. The leases which are twelve months in length are regulated by HUD as to rent, unit size, household composition and tenant income. For the year ended December 31, 2023, rental revenue earned by the Authority under the aforementioned leases totaled \$8,273,800.

Y. Economic Dependency

The Section 8 Housing Choice Vouchers and Public and Indian Housing programs of the Authority are economically dependent on operating grants and subsidies from HUD. The programs operate at a loss prior to receiving subsidies.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 2. CASH AND CASH EQUIVALENTS AND RESTRICTED CASH

As of December 31, 2023, the Authority had funds on deposit in checking, savings and money market accounts. As of December 31, 2023, the carrying amount of the Authority's cash (on deposit) was \$13,100,201 and the bank balances were \$13,742,532. Cash and cash equivalents consist of the following:

<u>Cash Category</u>	<u>Amount</u>
Unrestricted	\$ 7,053,061
Tenant security deposits	656,271
Restricted	<u>5,390,869</u>
Total cash, cash equivalents, and restricted cash	<u>\$ 13,100,201</u>

Of the bank balances, \$867,308 was covered by federal depository insurance and the remaining \$12,875,224 was collateralized with the pledging financial institution as of December 31, 2023.

Custodial credit risk is the risk that, in the event of a bank failure, the government's deposits may not be returned to it. As of December 31, 2023, the Authority's bank balances were not exposed to custodial credit risk.

NOTE 3. ACCOUNTS RECEIVABLE, NET

Accounts receivable, net consists of the following at December 31, 2023;

<u>Description</u>	<u>Amount</u>
Accounts receivable - HUD	\$ 203,594
Accounts receivable - tenants	381,567
Accounts receivable - other government	651,313
Accounts receivable - fraud recovery	106,096
Accounts receivable - miscellaneous	<u>233,484</u>
Total accounts receivable, net	<u>\$ 1,576,054</u>

Accounts receivable - HUD

Accounts receivable - HUD represents amounts due to the Authority for amounts expended under grant agreements that have not been reimbursed as of December 31, 2023. The Authority considers the entire amount to be collectable.

Accounts receivable - tenants

Accounts receivable - tenants represents amounts due for tenant rents and other tenant charges. At December 31, 2023, the balance is shown net of an allowance for doubtful accounts of \$116,368.

Accounts receivable - other government

Accounts receivable - other government consists of amounts due from other housing authorities for portable tenants in the Section 8 Housing Choice Vouchers program and from other governmental agencies for unreimbursed grant expenditures. Management estimates that these amounts are fully collectible and as such, no allowance for doubtful accounts is recorded.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 3. ACCOUNTS RECEIVABLE, NET (continued)

Accounts receivable - fraud recovery

Accounts receivable - fraud recovery, net represents amounts owed from tenants or other program participants who committed fraud or mis-representation and now owe additional rent or retroactive rent. At December 31, 2023, the balance is shown net of an allowance for doubtful accounts of \$6,477.

Accounts receivable - miscellaneous

Accounts receivable - miscellaneous consists of amounts owed from managed properties and other miscellaneous sources from normal ongoing operations. At December 31, 2023, the balance is shown net of an allowance for doubtful accounts of \$540,387.

NOTE 4. RESTRICTED DEPOSITS

Restricted deposits consists of the following as of December 31, 2023:

<u>Cash Category</u>	<u>Amount</u>
Restricted for Modernization and Development	\$ 3,598,541
Operating reserves	761,328
Reserves for replacement	69,674
Family self sufficiency program escrows	596,175
Homeownership escrows	365,151
Tenant security deposits	<u>656,271</u>
Total restricted deposits	<u>\$ 6,047,140</u>

Restricted funds for modernization in the public housing program are restricted for the revitalization and rehabilitation of public housing units.

Operating reserves represent funds that are restricted to cover operating deficits of various projects.

Reserves for replacement represent funds that are restricted for the modernization of public housing units and certain other non-federal units.

Family Self Sufficiency ("FSS") program escrows are restricted for use in the Section 8 Housing Choice Vouchers program by FSS program participants.

Homeownership escrows represent funds that are restricted to cover costs associated with homeownership.

Tenant security deposits represent amounts held in escrow on behalf of tenants to cover any unpaid rent or damages to the Authority owned unit.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 5. CAPITAL ASSETS, NET

The following is a summary of changes in capital assets for the year ended December 31, 2023:

Description	January 1, 2023	Additions	Dispositions	Transfers	December 31, 2023
<u>Non-depreciable capital assets:</u>					
Land	\$ 8,278,584	\$ -	\$ -	\$ -	\$ 8,278,584
Construction in progress	807,011	215,581	-	-	1,022,592
Total	<u>9,085,595</u>	<u>215,581</u>	<u>-</u>	<u>-</u>	<u>9,301,176</u>
<u>Depreciable capital assets:</u>					
Buildings	204,627,633	2,160,592	(93,060)	-	206,695,165
Furniture and equipment	7,118,263	613,312	(7,086)	-	7,724,489
Total	<u>211,745,896</u>	<u>2,773,904</u>	<u>(100,146)</u>	<u>-</u>	<u>214,419,654</u>
Less: accumulated depreciation	<u>188,302,288</u>	<u>3,149,000</u>	<u>(38,842)</u>	<u>-</u>	<u>191,412,446</u>
Net capital assets	<u>\$ 32,529,203</u>	<u>\$ (159,515)</u>	<u>\$ (61,304)</u>	<u>\$ -</u>	<u>\$ 32,308,384</u>

Depreciation expense for the year ended December 31, 2023, amounted to \$3,149,000.

NOTE 6. NOTES RECEIVABLE

The Authority has notes receivable (including accrued interest) related to the redevelopment of affordable housing units at December 31, 2023 in the amount of \$4,474,298. The notes receivable are shown net of an allowance for uncollectable amounts of \$4,474,298 and consist of the following:

Description	Amount
The Authority issued a \$3,881,598 loan to Mercy Timbercreek, LLC (the "LLC"), an affiliated limited liability company, to assist in the development of a low-to-moderate income housing complex known as Timbercreek Apartments. The principal amount and any unpaid accrued interest are payable only from net available cash flows of the LLC, as defined in the repayment agreement, with any outstanding principal and accrued interest due upon maturity. The note is secured by a deed of trust on the property, which is subordinate to a senior mortgage on the property.	\$ 3,881,598
The second mortgage notes consist of mortgages due from homeowners. These mortgages do not bear interest and are forgiven over the lives of the loans as long as the homeowners meet the home ownership program requirements. They are secured by the underlying property	<u>592,700</u>
Total notes receivable	4,474,298
Less: allowance for uncollectable amounts	<u>(4,474,298)</u>
Total notes receivable, net	<u>\$ -</u>

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 7. LEASES RECEIVABLE

On April 9, 2018, the Authority entered into a lease agreement as a lessor with T-Mobile Central, LLC for the lease of rooftop space on Evans Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for one additional five (5) year term. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$2,000, increasing by 10% at the beginning of the renewal term. For the year ended December 31, 2023, the Authority received principal payments of \$20,938 on the lease. As of December 31, 2023, the value of the lease receivable was \$104,875. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$89,537. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$20,662 and \$4,662, respectively.

In December 2015, the Authority entered into a lease agreement as a lessor with Omaha Cellular Telephone Company d/b/a Verizon Wireless for the lease of rooftop space on Florence Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for five (5) additional five (5) year terms. As of December 31, 2023, the value of the lease receivable was \$601,558. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$2,373, increasing by 3% each year. For the year ended December 31, 2023, the Authority received principal payments of \$6,091 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$540,825. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$24,676 and \$24,196, respectively.

In December 2014, the Authority entered into a lease agreement as a lessor with Omaha Cellular Telephone Company d/b/a Verizon Wireless for the lease of rooftop space on Benson Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for five (5) additional five (5) year terms. As of December 31, 2023, the value of the lease receivable was \$594,294. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$2,373, increasing by 3% each year. For the year ended December 31, 2023, the Authority received principal payments of \$7,264 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$516,623. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$24,699 and \$23,932, respectively.

On July 7, 2017, the Authority entered into a lease agreement as a lessor with T-Mobile Central, LLC for the lease of rooftop space on Benson Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for one additional five (5) year term. As of December 31, 2023, the value of the lease receivable was \$87,997. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$2,000, increasing by 10% at the beginning of the renewal term. For the year ended December 31, 2023, the Authority received principal payments of \$22,392 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$74,016. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$20,656 and \$4,008, respectively.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 7. LEASES RECEIVABLE (continued)

On July 7, 2017, the Authority entered into a lease agreement as a lessor with T-Mobile Central, LLC for the lease of rooftop space on Crown Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for one additional five (5) year term. As of December 31, 2023, the value of the lease receivable was \$87,997. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$2,000, increasing by 10% at the beginning of the renewal term. For the year ended December 31, 2023, the Authority received principal payments of \$22,392 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$74,016. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$20,656 and \$4,008, respectively.

On July 7, 2017, the Authority entered into a lease agreement as a lessor with Omaha Cellular Telephone Company d/b/a Verizon Wireless for the lease of rooftop space on Pine Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for four (4) additional five (5) year terms. As of December 31, 2023, the value of the lease receivable was \$363,833. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$1,833, increasing by 10% at the beginning of each renewal term. For the year ended December 31, 2023, the Authority received principal payments of \$9,441 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$303,752. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$16,345 and \$14,759, respectively.

On April 6, 2005, the Authority entered into a lease agreement as a lessor with OUSCOC of Greater Iowa, Inc. a Pennsylvania corporation, d/b/a US Cellular, Inc. for the lease of rooftop space on Crown Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for four (4) additional five (5) year terms. As of December 31, 2023, the value of the lease receivable was \$167,601. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$1,706 for the first fifteen (15) years, increasing to \$2,156 for the next five (5) years and finally increasing to \$2,604 for the remaining five (5) years. For the year ended December 31, 2023, the Authority received principal payments of \$18,759 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$90,836. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$14,343 and \$7,113, respectively.

On November 27, 2006, the Authority entered into a lease agreement as a lessor with Sprint Spectrum, LP for the lease of rooftop space on Kay Jay Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for four (4) additional five (5) year terms. As of December 31, 2023, the value of the lease receivable was \$199,054. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$1,700 for the first five (5) years, increasing to \$2,040 for the next five (5) years and finally increasing to \$2,448 for the remaining fifteen (15) years. For the year ended December 31, 2023, the Authority received principal payments of \$20,957 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$128,255. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$16,201 and \$8,419, respectively.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 7. LEASES RECEIVABLE (continued)

In August 2002, the Authority entered into a lease agreement as a lessor with USCOC of Greater Iowa, d/b/a US Cellular, Inc. for the lease of rooftop space on Florence Tower. The term of the lease was for twenty-five (25) years from the commencement date. As of December 31, 2023, the value of the lease receivable was \$110,492. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$1,706 for the first fifteen (15) years which was increased to \$1,806 during year eleven (11), increasing to \$2,256 for the next five (5) years and finally increasing to \$2,604 for the remaining five (5) years. For the year ended December 31, 2023, the Authority received principal payments of \$27,430 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$53,804. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$14,674 and \$5,018, respectively.

In May 2013, the Authority entered into a lease agreement as a lessor with New Cingular Wireless PCS, LLC for the lease of rooftop space on Underwood Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for four (4) additional five (5) year terms. As of December 31, 2023, the value of the lease receivable was \$345,718. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$1,600 increasing 3% every year. For the year ended December 31, 2023, the Authority received principal payments of \$11,409 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$239,943. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$16,644 and \$14,081, respectively.

In November 2006, the Authority entered into a lease agreement as a lessor with Sprint Spectrum, LP for the lease of rooftop space on Pine Tower. The term of the lease was for five (5) years from the commencement date, with an option to renew the lease for four (4) additional five (5) year terms. As of December 31, 2023, the value of the lease receivable was \$200,833. Beginning on the commencement of the lease term, monthly rent shall be paid to the Authority in the amount of \$1,700 for the first five (5) years, increasing by 10% every five (5) years, increasing to \$2,040 for the next five (5) years and finally increasing to \$2,448 for the remaining fifteen (15) years. For the year ended December 31, 2023, the Authority received principal payments of \$20,887 on the lease. The implicit interest rate on the lease was 4%. The value of the deferred inflows of resources as of December 31, 2023 was \$129,550. For the year ended December 31, 2023, the Authority recognized lease revenue and interest income on the lease in the amounts of \$16,194 and \$8,489, respectively.

Total lease receivable	\$ 2,864,252
Less: current portion	<u>199,101</u>
Lease receivable, net of current portion	<u>\$ 2,665,151</u>

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 8. COMPENSATED ABSENCES

Accrued compensated absences represents the amount of accumulated leave for which employees are entitled to receive payment in accordance with the Authority's Personnel Policy. Employees accrue compensated absences according to the following schedule:

<u>Years of Service</u>	<u>Number of Days</u>
1-4	1 working day per month
5-10	1 1/2 working days per month
11-19	1 2/3 working days per month
20 and over	2 working days per month

Employees are allowed to carry over thirty-five days into the subsequent year. Employees accrue sick days at the rate of 8 hours per month. Upon termination, employees with thirteen to seventeen years of service will be paid 25% of sick time to a maximum of 240 hours. At eighteen years of service or upon death, employees will be paid 50% of sick time to a maximum of 240 hours

Compensated absences activity for the year ended December 31, 2023 consisted of the following:

<u>Description</u>	<u>Amount</u>
Beginning compensated absences	\$ 594,220
Compensated absences earned	275,510
Compensated absences redeemed	<u>(149,937)</u>
Ending compensated absences	719,793
Less: current portion	<u>-</u>
Compensated absences, non-current	<u>\$ 719,793</u>

NOTE 9. LONG-TERM DEBT

Long-term debt consisted of the following as of December 31, 2023:

<u>Description</u>	<u>Amount</u>
The Authority entered into a CDBG loan with the City of Omaha, in the original principal amount of \$102,000. The loan is collateralized by a security interest in 1234 South 13th St. LLC. The loan is non-interest bearing with monthly payments of \$238 which began in January 2021. The loan matures in January 2051.	\$ 102,000
The Authority has entered into a CDBG mortgage note payable with the City of Omaha Planning Department, in the original amount of \$400,000. The loan is secured by Omaha Crown Limited Partnership I property and equipment. The loan bears interest at 1% per annum with monthly payments of \$1,287, maturing in December 2047.	400,000

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 9. LONG-TERM DEBT (continued)

The Authority has entered into a HOME Loan with the City of Omaha, Nebraska, in the original amount of \$300,000. The loan is collateralized by a security interest in 1613 Farnam St. LLC and is non-interest bearing. The loan has monthly payments of \$833 which began in January 2021 and will mature on December 1, 2050.

300,000

The Authority entered into a note payable with First National Bank in the original amount of \$200,000. The note is secured by an interest in the central office building and bears interest at 5.50% per annum. The note has monthly payments of \$1,715 and was paid off on June 1, 2023.

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The Authority has entered into a note payable with Access Bank, in the original amount of \$1,760,000. The note is secured by an interest in the central office building and bears interest at 4.71% per annum. The note has monthly payments of \$10,063, with a balloon payment due at maturity in the amount of \$1,301,425. The note matures on August 2, 2028.

1,537,065

The Authority has entered into a note payable with Bank of the West. The note is secured by an interest in the Omaha Crown II building and is non-interest bearing. The note was due in full in 2018. The loan was paid off in full during 2023.

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Total long-term debt
Less: current portion

2,339,065
48,168

Total long-term debt, net

\$ 2,290,897

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 9. LONG-TERM DEBT (continued)

Annual debt service for principal over the next five years and in five-year increments thereafter is as follows:

<u>Year</u>	<u>Principal</u>	<u>Interest</u>	<u>Total</u>
2024	\$ 48,168	\$ 72,593	\$ 120,761
2025	50,727	70,034	120,761
2026	53,203	67,558	120,761
2027	55,800	64,961	120,761
2028	1,329,167	41,921	1,371,088
2029-2033	-	-	-
2034-2038	-	-	-
2039-2043	-	-	-
2044-2048	400,000	26,900	426,900
2049-2051	<u>402,000</u>	<u>4,000</u>	<u>406,000</u>
	<u>\$ 2,339,065</u>	<u>\$ 347,967</u>	<u>\$ 2,687,032</u>

NOTE 10. OTHER CURRENT AND NON-CURRENT LIABILITIES

Other current and non-current liabilities for the year ended December 31, 2023 consist of the following:

<u>Description</u>	<u>Balance at January 1, 2023</u>	<u>Additions</u>	<u>Deletions</u>	<u>Balance at December 31, 2023</u>	<u>Due within one year</u>
Notes payable	\$ 2,415,890	\$ -	\$ (76,825)	\$ 2,339,065	\$ 48,168
Accrued compensated absences	594,220	275,510	(149,937)	719,793	-
Homeownership reserves	395,956	-	(33,757)	362,199	-
FSS Escrows	567,966	-	(28,114)	539,852	-
Other liabilities	<u>169,730</u>	<u>313,282</u>	<u>(169,730)</u>	<u>313,282</u>	<u>313,282</u>
Total	<u>\$ 4,143,762</u>	<u>\$ 588,792</u>	<u>\$ (458,363)</u>	<u>\$ 4,274,191</u>	<u>\$ 361,450</u>

NOTE 11. RESTRICTED NET POSITION

Restricted net position consists of the following at December 31, 2023:

<u>Description</u>	<u>Amount</u>
Restricted for modernization	\$ 3,598,541
Reserves for replacement	69,674
Operating reserves	<u>761,328</u>
Total restricted net position	<u>\$ 4,429,543</u>

Restricted funds for modernization in the public housing program are restricted for the revitalization and rehabilitation of public housing units.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 11. RESTRICTED NET POSITION (continued)

Reserves for replacement are restricted for use in the tax credit entities, for modernization of existing public housing units and / or development of new public housing units.

Operating reserves represent funds that are restricted in the case the project or program encounters an operating deficit.

NOTE 12. CONDENSED FINANCIAL INFORMATION FOR THE BLENDED COMPONENT UNITS

	Housing in Omaha, Inc.	North Omaha Affordable Housing Limited Partnership	1234 South 13th Street Limited Liability Company	Omaha Crown Limited Partnership II	1613 Farnam Street Limited Liability Company
Assets:					
Current assets	\$ 3,075,608	\$ 29,432	\$ 98,221	\$ 49,744	\$ 23,579
Capital assets, net	394,389	747,937	48,367	199,992	254,546
Other non-current assets	<u>3,976,606</u>	<u>300,750</u>	<u>1,510</u>	<u>1,510</u>	<u>1,510</u>
Total assets	<u>7,446,603</u>	<u>1,078,119</u>	<u>148,098</u>	<u>251,246</u>	<u>279,635</u>
Liabilities:					
Current	-	810,981	695,611	269,987	2,488,951
Non-current	<u>-</u>	<u>893,253</u>	<u>320,210</u>	<u>164,014</u>	<u>853,588</u>
Total liabilities	<u>-</u>	<u>1,704,234</u>	<u>1,015,821</u>	<u>434,001</u>	<u>3,342,539</u>
Net Position:					
Net investment in capital assets	394,389	(145,316)	(261,789)	38,429	(598,534)
Restricted	-	299,662	-	-	-
Unrestricted	<u>7,052,214</u>	<u>(780,461)</u>	<u>(605,934)</u>	<u>(221,184)</u>	<u>(2,464,370)</u>
Net position	<u>\$ 7,446,603</u>	<u>\$ (626,115)</u>	<u>\$ (867,723)</u>	<u>\$ (182,755)</u>	<u>\$ (3,062,904)</u>
	Strehlow Housing Partners Limited Partnership	Omaha Crown Limited Partnership I	Securities Building Limited Partnership	Keystone Crown I, LP	Total Blended Component Units
Assets:					
Current assets	\$ 36,513	\$ 81,240	\$ 114,375	\$ 116,176	\$ 3,624,888
Capital assets, net	2,606,688	246,029	-	2,022,771	6,520,719
Other non-current assets	<u>341,139</u>	<u>-</u>	<u>171,924</u>	<u>-</u>	<u>4,794,949</u>
Total assets	<u>2,984,340</u>	<u>327,269</u>	<u>286,299</u>	<u>2,138,947</u>	<u>14,940,556</u>
Liabilities:					
Current	4,104,869	375,771	(218)	2,102,160	10,848,112
Non-current	<u>2,178,171</u>	<u>642,478</u>	<u>-</u>	<u>2,356,092</u>	<u>7,407,806</u>
Total liabilities	<u>6,283,040</u>	<u>1,018,249</u>	<u>(218)</u>	<u>4,458,252</u>	<u>18,255,918</u>
Net Position:					
Net investment in capital assets	452,688	(395,513)	-	(327,229)	(842,875)
Restricted	340,385	-	-	-	640,047
Unrestricted	<u>(4,091,773)</u>	<u>(295,467)</u>	<u>286,517</u>	<u>(1,992,076)</u>	<u>(3,112,534)</u>
Net position	<u>\$ (3,298,700)</u>	<u>\$ (690,980)</u>	<u>\$ 286,517</u>	<u>\$ (2,319,305)</u>	<u>\$ (3,315,362)</u>

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 12. CONDENSED FINANCIAL INFORMATION FOR THE BLENDED COMPONENT UNITS (continued)

	Housing in Omaha, Inc.	North Omaha Affordable Housing Limited Partnership	1234 South 13th Street Limited Liability Company	Omaha Crown Limited Partnership II	1613 Farnam Street Limited Liability Company
Operating revenues:					
Tenant revenue	\$ (2)	\$ 247,265	\$ 125,562	\$ 84,394	\$ 201,690
Other revenues	<u>206,219</u>	<u>100</u>	<u>41,685</u>	<u>1,010</u>	<u>98,802</u>
Total operating revenues	<u>206,217</u>	<u>247,365</u>	<u>167,247</u>	<u>85,404</u>	<u>300,492</u>
Operating expenses:					
Administrative	1,393	32,453	33,421	27,637	88,385
Maintenance, utilities, and taxes	-	127,114	90,417	41,510	145,785
Depreciation	31,390	173,620	11,262	43,961	49,588
Other	<u>20,537</u>	<u>50,678</u>	<u>33,241</u>	<u>21,566</u>	<u>89,796</u>
Total operating expenses	<u>53,320</u>	<u>383,865</u>	<u>168,341</u>	<u>134,674</u>	<u>373,554</u>
Other income (expense)					
Interest income	-	1,185	-	-	-
Interest expense	<u>-</u>	<u>(6,517)</u>	<u>(1,099)</u>	<u>(1,209)</u>	<u>(3,645)</u>
Net other expense	<u>-</u>	<u>(5,332)</u>	<u>(1,099)</u>	<u>(1,209)</u>	<u>(3,645)</u>
Net income (loss)	<u>\$ 152,897</u>	<u>\$ (141,832)</u>	<u>\$ (2,193)</u>	<u>\$ (50,479)</u>	<u>\$ (76,707)</u>
	Strehlow Housing Partners Limited Partnership	Omaha Crown Limited Partnership I	Securities Building Limited Partnership	Keystone Crown I, LP	Total Blended Component Unit
Operating revenues:					
Tenant revenue	\$ 536,624	\$ 132,000	\$ 102,957	\$ 277,883	\$ 1,708,373
Other revenues	<u>3,534</u>	<u>2,997</u>	<u>89</u>	<u>150</u>	<u>354,586</u>
Total operating revenues	<u>540,158</u>	<u>134,997</u>	<u>103,046</u>	<u>278,033</u>	<u>2,062,959</u>
Operating expenses:					
Administrative	135,389	30,067	2,661	23,390	374,796
Maintenance, utilities, and taxes	387,214	79,299	133	136,025	1,007,497
Depreciation	218,961	5,903	-	199,319	734,004
Other	<u>171,822</u>	<u>42,627</u>	<u>(9,235)</u>	<u>74,722</u>	<u>495,754</u>
Total operating expenses	<u>913,386</u>	<u>157,896</u>	<u>(6,441)</u>	<u>433,456</u>	<u>2,612,051</u>
Other income (expense)					
Interest income	7,290	-	-	-	8,475
Interest expense	<u>(4,470)</u>	<u>(1,914)</u>	<u>-</u>	<u>(31,643)</u>	<u>(50,497)</u>
Net other expense	<u>2,820</u>	<u>(1,914)</u>	<u>-</u>	<u>(31,643)</u>	<u>(42,022)</u>
Net income (loss)	<u>\$ (370,408)</u>	<u>\$ (24,813)</u>	<u>\$ 109,487</u>	<u>\$ (187,066)</u>	<u>\$ (591,114)</u>

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 13. GAIN ON SALE OF CAPITAL ASSETS

During the year ended December 31, 2023, the Authority sold three (3) building properties with proceeds totaling \$517,000. The Authority recorded a gain of \$488,881 on the sale of these properties.

NOTE 14. DEFINED CONTRIBUTION PENSION PLAN

The Authority has a governmental 457(b) deferred compensation plan administered by Empower. A 457 (b) deferred compensation plan is a retirement savings plan that allows eligible employees to supplement any existing retirement and pension benefits by saving and investing before-tax dollars through a voluntary salary contribution. Contributions and any earnings on contributions are tax-deferred until money is withdrawn. Distributions are subject to ordinary income tax. The Authority does not contribute to this plan.

The Authority contributes to a 401-a defined contribution plan administered by the Authority. A defined contribution plan provides the opportunity to save for retirement on a tax-advantaged basis. Under a defined contribution plan, the benefits a participant will receive depend solely on the amount contributed to the participant's account, the return earned on investments of those contributions, and forfeitures of other participants' benefits that may be allocated to such participant's account. All regular, full-time, eligible employees, including unionized employees, of the Authority may participate in the pension plan starting four (4) months after date of hire. Employees are required to contribute 5.50% of their compensation and will be vested as follows:

- 1 year employed - 50% vested
- 2 years employed - 60% vested
- 3 years employed - 70% vested
- 4 years employed - 100% vested

During the year, the Authority's required and actual contributions amounted to \$515,174. Employees' required contributions amounted to \$515,161. Employees' voluntary contributions amounted to \$80,455.

NOTE 15. RISK MANAGEMENT

The Authority is exposed to various risks related to torts; theft of, damage to and destruction of assets; errors and omissions; injuries to employees; and natural disasters. Significant losses are covered by commercial insurance for all major programs, and there have been no significant reductions in insurance coverage. Claims expenditures and liabilities are reported when it is probable that a loss has occurred, the amount of the loss can be reasonably estimated, and said amount exceeds insurance coverage. Settlement amounts have not exceeded insurance coverage for the last three years.

NOTE 16. CONTINGENCIES

The Authority receives financial assistance from HUD in the form of grants and subsidies. Entitlement to the funds is generally conditional upon compliance with terms and conditions of the grant agreements and applicable regulations, including the expenditure of funds for eligible purposes. Substantially all grants, entitlements and cost reimbursements are subject to financial and compliance audits by HUD. As a result of these audits, costs previously reimbursed could be disallowed and require payments to HUD.

As of December 31, 2023, the Authority estimates that no material liabilities will result from such audits.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO FINANCIAL STATEMENTS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 17. SUBSEQUENT EVENTS

Events that occur after the financial statement date but before the financial statements were available to be issued must be evaluated for recognition or disclosure. The effects of subsequent events that provide evidence about conditions that existed at the financial statement date are recognized in the accompanying financial statements. Subsequent events which provide evidence about conditions that existed after the financial statement date require disclosure in the accompanying notes to the financial statements. Management evaluated the activity of the Authority through September 19, 2024 (the date the financial statements were available to be issued) and concluded that no subsequent events have occurred that would require recognition in the financial statements or disclosure in the notes to the financial statements.

**INDEPENDENT AUDITORS' REPORT ON INTERNAL CONTROL OVER
FINANCIAL REPORTING AND ON COMPLIANCE AND OTHER MATTERS
BASED ON AN AUDIT OF FINANCIAL STATEMENTS PERFORMED IN
ACCORDANCE WITH *GOVERNMENT AUDITING STANDARDS***

To the Board of Commissioners
Housing Authority of the City of Omaha, Nebraska:

We have audited, in accordance with the auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States, the financial statements of the Housing Authority of the City of Omaha, Nebraska (the "Authority") as of and for the year ended December 31, 2023, and the related notes to the financial statements, which collectively comprise the Authority's financial statements, and have issued our report thereon dated September 19, 2024.

Report on Internal Control Over Financial Reporting

In planning and performing our audit of the financial statements, we considered the Authority's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control. Accordingly, we do not express an opinion on the effectiveness of the Authority's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, misstatements on a timely basis. A *material weakness* is a deficiency, or a combination of deficiencies, in internal control such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. We identified certain deficiencies in internal control, described in the accompanying schedule of findings and questioned costs as Finding 2023-001 that we consider to be a material weakness.

Report on Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Authority's financial statements are free from material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the financial statements. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

Authority's Response to Findings

Government Auditing Standards requires the auditor to perform limited procedures on the Authority's response to the findings identified in our engagement and described in the accompanying schedule of findings and questioned costs. The Authority's response was not subjected to the other auditing procedures applied in the engagement to audit the financial statements and, accordingly, we express no opinion on the response.

Purpose of this Report

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the results of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.

Novogradac & Company LLP

September 19, 2024
Toms River, New Jersey

**INDEPENDENT AUDITORS' REPORT ON COMPLIANCE FOR EACH
MAJOR PROGRAM AND ON INTERNAL CONTROL OVER COMPLIANCE
REQUIRED BY THE UNIFORM GUIDANCE**

To the Board of Commissioners
Housing Authority of the City of Omaha, Nebraska:

Report on Compliance for Each Major Federal Program

Opinion on Each Major Federal Program

We have audited the Housing Authority of the City of Omaha, Nebraska's (the "Authority") compliance with the types of compliance requirements described in the OMB Compliance Supplement that could have a direct and material effect on each of the Authority's major federal programs for the year ended December 31, 2023. The Authority's major federal programs are identified in the summary of auditors' results section of the accompanying schedule of findings and questioned costs.

In our opinion, the Authority complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its major federal programs for the year ended December 31, 2023.

Basis for Opinion on Each Major Federal Program

We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States of America; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Our responsibilities under those standards and the Uniform Guidance are further described in the Auditor's Responsibilities for the Audit of Compliance section of our report.

We are required to be independent of the Authority and to meet our other ethical responsibilities, in accordance with relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion on compliance for each major federal program. Our audit does not provide a legal determination of the Authority's compliance with the compliance requirements referred to above.

Responsibilities of Management for Compliance

Management is responsible for compliance with the requirements referred to above and for the design, implementation, and maintenance of effective internal control over compliance with the requirements of laws, statutes, regulations, rules, and provisions of contracts or grant agreements applicable to the Authority's federal programs.

Auditors' Responsibilities for the Audit of Compliance

Our objectives are to obtain reasonable assurance about whether material noncompliance with the compliance requirements referred to above occurred, whether due to fraud or error, and express an opinion on the Authority's compliance based on our audit. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance will always detect material noncompliance when it exists. The risk of not detecting material noncompliance resulting from fraud is higher than for that resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control. Noncompliance with the compliance requirements referred to above is considered material if there is a substantial likelihood that, individually or in the aggregate, it would influence the judgment made by a reasonable user of the report on compliance about the Authority's compliance with the requirements of each major federal program as a whole.

In performing an audit in accordance with generally accepted auditing standards, *Government Auditing Standards*, and the Uniform Guidance, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material noncompliance, whether due to fraud or error, and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the Authority's compliance with the compliance requirements referred to above and performing such other procedures as we considered necessary in the circumstances.
- Obtain an understanding of the Authority's internal control over compliance relevant to the audit in order to design audit procedures that are appropriate in the circumstances and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of the Authority's internal control over compliance. Accordingly, no such opinion is expressed.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and any significant deficiencies and material weaknesses in internal control over compliance that we identified during the audit.

Other Matters

The results of our auditing procedures disclosed instances of noncompliance which are required to be reported in accordance with the Uniform Guidance and which are described in the accompanying schedule of findings and questioned costs as items 2023-002 and 2023-003. Our opinion on the major federal program is not modified with respect to these matters.

Report on Internal Control over Compliance

Our consideration of internal control over compliance was for the limited purpose described in the Auditors' Responsibilities for the Audit of Compliance section above and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies in internal control over compliance and therefore, material weaknesses or significant deficiencies may exist that were not identified. However, as discussed below, we did identify deficiencies in internal control over compliance that we consider to be significant deficiencies.

Report on Internal Control over Compliance (continued)

A *deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. A *material weakness in internal control over compliance* is a deficiency, or combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis.

A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness in internal control over compliance, yet important enough to merit attention by those charged with governance. We consider the deficiencies in internal control over compliance described in the accompanying schedule of findings and questioned costs as items 2023-002 and 2023-003 to be significant deficiencies.

Our audit was not designed for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, no such opinion is expressed.

Authority's Response to Findings

Government Auditing Standards requires the auditor to perform limited procedures on the Authority's response to the internal control over compliance findings identified in our audit described in the accompanying schedule of findings and questioned costs. The Authority's response was not subjected to other auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the response.

Purpose of this Report

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

Novogradac & Company LLP

September 19, 2024
Toms River, New Jersey

SUPPLEMENTARY INFORMATION

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
YEAR ENDED DECEMBER 31, 2023

<u>Federal Grantor/Program Title</u>	<u>Federal AL Number</u>	<u>Total Expenditures</u>
<u>U.S. Department of Housing and Urban Development</u>		
Housing Voucher Cluster:		
Section 8 Housing Choice Vouchers	14.871	\$ 40,919,431
Mainstream Vouchers	14.879	826,995
Emergency Housing Vouchers	14.EHV	<u>1,007,568</u>
Total Housing Voucher Cluster		42,753,994
Section 8 Project Based Cluster:		
Lower Income Housing Assistance Program - Section 8 Moderate Rehabilitation	14.856	<u>546,513</u>
Total Section 8 Project Based Cluster		546,513
Public and Indian Housing Program	14.850	8,909,610
Public Housing Capital Fund	14.872	7,792,279
Resident Opportunity and Supportive Services	14.870	272,106
Family Self Sufficiency Program	14.896	<u>426,972</u>
Subtotal U.S. Department of Housing and Urban Development - Direct		<u>60,701,474</u>
U.S. Department of Housing and Urban Development		
Passed through the City of Omaha -		
Planning Department:		
HOME Investment Partnerships Program	14.239	<u>175,836</u>
Passed through the City of Omaha:		
Choice Neighborhood Implementation Grant	14.889	869,875
Community Development Block Grant / Entitlement Grants	14.218	<u>3,500</u>
Total passed through the City of Omaha		873,375
Subtotal U.S. Department of Housing and Urban Development - Pass-through		<u>1,049,211</u>
Total Expenditures of Federal Awards		<u>\$ 61,750,685</u>

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS
YEAR ENDED DECEMBER 31, 2023

NOTE 1. BASIS OF PRESENTATION

The accompanying Schedule of Expenditures of Federal Awards (the "Schedule") includes the federal grant activity of Housing Authority of the City of Omaha, Nebraska under programs of the federal government for the year ended December 31, 2023. The information in the Schedule is presented in accordance with the requirements of Title 2 *U.S. Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Because the Schedule presents only a selected portion of operations of the Housing Authority of the City of Omaha, Nebraska, it is not intended to and does not present the financial position, changes in net position or cash flows of the Housing Authority of the City of Omaha, Nebraska.

NOTE 2. SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

Expenditures reported on the Schedule are reported on the accrual basis of accounting. Such expenditures are recognized following the principles contained in the Uniform Guidance, wherein certain types of expenditures are not allowable or are limited as to reimbursement.

NOTE 3. INDIRECT COST RATE

The Authority has elected not to use the 10-percent de minimis indirect cost rate allowed under the Uniform Guidance.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 4. SCHEDULE OF CAPITAL FUND PROGRAM COSTS AND ADVANCES

The total amounts of Capital Fund Program Costs and Advances incurred and earned by the Housing Authority of the City of Omaha, Nebraska as of and for the year ended December 31, 2023 are provided herein:

	<u>501-15</u>	<u>501-16</u>	<u>501-17</u>	<u>501-18</u>	<u>501-19</u>	<u>L501-19</u>	<u>501-20</u>	<u>501-21</u>
Budget	\$ <u>2,971,181</u>	\$ <u>3,327,129</u>	\$ <u>3,443,493</u>	\$ <u>5,366,997</u>	\$ <u>5,612,511</u>	\$ <u>660,000</u>	\$ <u>6,017,802</u>	\$ <u>5,808,517</u>
<u>Advances:</u>								
Cumulative through 12/31/22	\$ -	\$ 3,192,436	\$ 3,354,514	\$ 5,346,820	\$ 5,527,176	\$ 9,892	\$ 3,891,764	\$ 3,474,032
Current Year	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>85,335</u>	<u>220,665</u>	<u>1,802,562</u>	<u>2,196,586</u>
Cumulative through 12/31/23	<u>-</u>	<u>3,192,436</u>	<u>3,354,514</u>	<u>5,346,820</u>	<u>5,612,511</u>	<u>230,557</u>	<u>5,694,326</u>	<u>5,670,618</u>
<u>Costs:</u>								
Cumulative through 12/31/22	-	3,192,436	3,354,514	5,346,820	5,527,176	9,892	3,891,764	3,474,032
Current Year	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>85,335</u>	<u>220,665</u>	<u>1,802,562</u>	<u>2,196,586</u>
Cumulative through 12/31/23	<u>-</u>	<u>3,192,436</u>	<u>3,354,514</u>	<u>5,346,820</u>	<u>5,612,511</u>	<u>230,557</u>	<u>5,694,326</u>	<u>5,670,618</u>
Excess / (Deficiency)	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>
	<u>R501-12</u>	<u>R501-13</u>	<u>R501-14</u>	<u>R501-15</u>	<u>R502-12</u>	<u>R502-13</u>	<u>R502-14</u>	<u>E501-20</u>
Budget	\$ <u>224,018</u>	\$ <u>242,493</u>	\$ <u>231,173</u>	\$ <u>235,754</u>	\$ <u>131,087</u>	\$ <u>113,749</u>	\$ <u>132,983</u>	\$ <u>227,273</u>
<u>Advances:</u>								
Cumulative through 12/31/22	\$ 223,122	\$ 242,493	\$ 231,173	\$ 235,754	\$ -	\$ 113,749	\$ 132,983	\$ 154,774
Current Year	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>72,499</u>
Cumulative through 12/31/23	<u>223,122</u>	<u>242,493</u>	<u>231,173</u>	<u>235,754</u>	<u>-</u>	<u>113,749</u>	<u>132,983</u>	<u>227,273</u>
<u>Costs:</u>								
Cumulative through 12/31/22	223,122	242,493	231,173	235,754	-	113,749	132,983	154,774
Current Year	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>-</u>	<u>72,499</u>
Cumulative through 12/31/23	<u>223,122</u>	<u>242,493</u>	<u>231,173</u>	<u>235,754</u>	<u>-</u>	<u>113,749</u>	<u>132,983</u>	<u>227,273</u>
Excess / (Deficiency)	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS (continued)
YEAR ENDED DECEMBER 31, 2023

NOTE 4. SCHEDULE OF CAPITAL FUND PROGRAM COSTS AND ADVANCES (continued)

	<u>E501-21</u>	<u>501-22</u>	<u>501-23</u>	<u>Totals</u>
Budget	\$ <u>247,000</u>	\$ <u>7,139,851</u>	\$ <u>7,195,791</u>	\$ <u>42,188,951</u>
<u>Advances:</u>				
Cumulative through 12/31/22	\$ 63,547	\$ 63,547	\$ -	\$ 26,257,776
Current Year	<u>82,983</u>	<u>821,030</u>	<u>2,510,619</u>	<u>7,792,279</u>
Cumulative through 12/31/23	<u>146,530</u>	<u>884,577</u>	<u>2,510,619</u>	<u>34,050,055</u>
<u>Costs:</u>				
Cumulative through 12/31/22	63,547	63,547	-	26,257,776
Current Year	<u>82,983</u>	<u>821,030</u>	<u>2,510,619</u>	<u>7,792,279</u>
Cumulative through 12/31/23	<u>146,530</u>	<u>884,577</u>	<u>2,510,619</u>	<u>34,050,055</u>
Excess / (Deficiency)	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>	\$ <u>-</u>

During the year ended December 31, 2023, Capital Fund Grant NE26P001501-19 with approved funding of \$5,612,511 had been fully drawn down and expended as per Capital Fund Grant Regulations.

During the year ended December 31, 2023, Capital Fund Grant NE26E001501-20 with approved funding of \$227,273 had been fully drawn down and expended as per Capital Fund Grant Regulations.

In addition, prior to the year ended December 31, 2023, Replacement Housing Factor Grants NE26R001501-13, NE26R001501-14, NE26R001501-15, NE26R001502-13, and NE26R001502-14 with approved funding of \$242,493, \$231,173, \$235,754, \$113,749, and \$132,983, respectively, had been fully drawn down and expended as per Capital Fund Grant Regulations.

**HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
SCHEDULE OF FINDINGS AND QUESTIONED COSTS
FOR THE YEAR ENDED DECEMBER 31, 2023**

I. Summary of Auditors' Results

Financial Statements

1.	Type of auditors' report issued:	Unmodified
2.	Internal control over financial reporting	
a.	Material weakness(es) identified?	Yes
b.	Significant deficiency(ies) identified?	None reported
3.	Noncompliance material to the financial statements?	No

Federal Awards

1.	Internal control over compliance:	
a.	Material weakness(es) identified?	No
b.	Significant deficiency(ies) identified?	Yes
2.	Type of auditors' report on compliance for major programs:	Unmodified
3.	Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)?	Yes
4.	Identification of major program:	

<u>ALN Number</u>	<u>Name of Federal Program</u>
14.871	Housing Voucher Cluster
14.879	Housing Choice Voucher Program
14.EHV	Mainstream Program
	Emergency Housing Vouchers Program
14.850	Public and Indian Housing Program
14.872	Public Housing Capital Fund Program

5.	Dollar threshold used to distinguish between Type A and Type B Programs:	\$1,852,521
6.	Auditee qualified as low-risk Auditee?	No

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (continued)
FOR THE YEAR ENDED DECEMBER 31, 2023

II. Financial Statement Findings

Finding 2023-001

Statement of condition: The unaudited account balances of cash, accounts receivable, construction in progress, inter-program loans, accrued interest payable, accounts payable, other current liabilities, and noncurrent liabilities were misstated. In addition, there were numerous journal entries proposed during the audit.

Criteria: The Authority must ensure that proper internal controls are in place to initiate, authorize, record, process and report financial data reliably in accordance with generally accepted accounting principles.

Condition: There is a reasonable possibility that a misstatement of the Authority's financial statements will not be prevented or detected by the Authority's internal control.

Cause: Controls are not in place to ensure the Authority records and reports financial data reliably in accordance with generally accepted accounting principles.

Recommendation: The Authority should ensure proper internal controls, which include timely monthly reconciliations of account balances, are in place to prevent material weaknesses from occurring.

Authority Response: Auditee agrees with the auditor and management will be responsible for implementing the corrective action plan.

III. Federal Award Findings and Questioned Costs

Finding 2023-002

Federal Agency: U.S. Department of Housing and Urban Development
Federal Program Titles: Section 8 Housing Choice Vouchers Program,
Federal Catalog Numbers: 14.871
Noncompliance - E - Eligibility
Non Compliance Material to the Financial Statements: No
Significant Deficiency in Internal Control over Compliance

Criteria: Tenant Files. The PHA must do the following: As a condition of admission or continued occupancy, require the tenant and other family member to provide necessary information, documentation, and releases for the PHA to verify income eligibility (24 CFR sections 5.230, 5.609, and 982.516).

Condition: Based upon inspection of the Authority's files and on discussion with management, there were documents that were unavailable for examination at the time of audit.

Context: Of a sample size of forty-three (43) tenant files, the following information was unavailable for examination at the time of audit:

- (3) Verification of Income
- (2) Verification of Assets
- (1) HUD Form 50058

Our sample size is statistically valid.

**HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (continued)
FOR THE YEAR ENDED DECEMBER 31, 2023**

III. Federal Award Findings and Questioned Costs (continued)

Finding 2023-002 (continued)

Known Questioned Costs: 7,162

Cause: There is a significant deficiency in internal controls over the compliance for the eligibility type of compliance related to the maintenance of tenant files. The Authority has not properly considered, designed, implemented, maintained and monitored a system of internal controls that reasonably assures the program is in compliance.

Effect: The Section 8 Housing Choice Voucher Program is in non-compliance with the eligibility type of compliance requirements of the program.

Recommendation: We recommend the Authority design and implement internal control procedures that will reasonably assure compliance with the Uniform Guidance and the compliance supplement.

View of Responsible Officials and Corrective Actions: The Authority accepts the recommendation of the auditor. The Authority will increase oversight in the Section 8 Housing Choice Vouchers Program to ensure that established internal control policies are being followed on a timely basis.

Finding 2023-003:

Federal Agency: U.S. Department of Housing and Urban Development

Federal Program Titles: Section 8 Housing Choice Vouchers Program

Federal Assistance Listing Numbers: 14.871

Noncompliance – N. Special Tests and Provisions – Housing Quality Standards (HQS) Enforcement

Non Compliance Material to the Financial Statements: No

Significant Deficiency in Internal Control over Compliance for Special Tests and Provisions

Criteria: HQS Enforcement. For units under a HAP contract that fail to meet HQS, the PHA must require the owner to correct all life threatening HQS deficiencies within 24 hours after the inspections and all other deficiencies within 30 days or within a specified PHA-approved extension.

Condition: Based upon inspection of the Authority's files and on discussion with management, the Authority did not properly abate one (1) out of twenty-five (25) annual failed inspections selected for testing.

Context: The Authority did not properly abate one (1) out of twenty-five (25) failed inspections selected for testing. As a result, the Authority was not in compliance with the HQS as required by 24 CFR sections 982.158(d) and 982.405(b).

Known Questioned Costs: \$1,532

Cause: There is a significant deficiency in internal controls over the compliance for the special tests and provisions type of compliance related to HQS enforcement. The Authority has not properly considered, designed, implemented, maintained and monitored a system of internal controls that assures the program is in compliance.

Effect: The Section 8 Housing Choice Vouchers Program is in non-compliance with the special tests and provisions type of compliance related to HQS enforcement.

Recommendation: We recommend the Authority design and implement internal control procedures that will reasonably assure compliance with the Uniform Guidance and the compliance supplement.

HOUSING AUTHORITY OF THE CITY OF OMAHA, NEBRASKA
SCHEDULE OF FINDINGS AND QUESTIONED COSTS (continued)
FOR THE YEAR ENDED DECEMBER 31, 2023

III. Federal Award Findings and Questioned Costs (continued)

Finding 2023-003 (continued):

View of Responsible Officials and Corrective Actions: The Authority accepts the recommendation of the auditor. The Authority will increase oversight in the Section 8 Housing Choice Vouchers Program to ensure that established internal control policies are being followed on a timely basis.

IV. Summary of Prior Audit Findings

Finding 2022-001

Observation: Several material adjusting journal entries were required in order to reconcile beginning net position to the prior year's audited financial statements.

Status: This finding remains open. See audit Finding 2023-001

Finding 2022-002

Observation: Tenant file documentation was not found during examination of Section 8 Housing Choice Vouchers tenant files.

Status: This finding remains open. See audit Finding 2023-002.

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Balance Sheet Summary

Fiscal Year End: 12/31/2023

	Project Total	14.879 Mainstream Vouchers	14.889 Choice Neighborhoods Implementation Grants	14.239 HOME Investment Partnerships Program	14.238 Shelter Plus Care	14.896 PIH Family Self-Sufficiency Program
111 Cash - Unrestricted	\$3,449,960	\$113,430	\$28,073	\$263,948	\$28,699	\$59,649
112 Cash - Restricted - Modernization and Development	\$3,598,541	\$0	\$0	\$0	\$0	\$0
113 Cash - Other Restricted	\$402,629	\$0	\$0	\$0	\$0	\$0
114 Cash - Tenant Security Deposits	\$519,097	\$0	\$0	\$0	\$0	\$0
115 Cash - Restricted for Payment of Current Liabilities	\$0	\$0	\$0	\$0	\$0	\$0
100 Total Cash	\$7,970,227	\$113,430	\$28,073	\$263,948	\$28,699	\$59,649
121 Accounts Receivable - PHA Projects	\$0	\$0	\$0	\$0	\$0	\$0
122 Accounts Receivable - HUD Other Projects	\$0	\$0	\$0	\$0	\$0	\$0
124 Accounts Receivable - Other Government	\$0	\$0	\$623,613	\$27,398	\$0	\$0
125 Accounts Receivable - Miscellaneous	\$114,745	\$25,909	\$0	\$19,563	\$6,147	\$0
126 Accounts Receivable - Tenants	\$412,993	\$0	\$0	\$362	\$0	\$0
126.1 Allowance for Doubtful Accounts - Tenants	-\$55,999	\$0	\$0	\$0	\$0	\$0
126.2 Allowance for Doubtful Accounts - Other	-\$123,872	\$0	\$0	\$0	\$0	\$0
127 Notes, Loans, & Mortgages Receivable - Current	\$0	\$0	\$0	\$0	\$0	\$0
128 Fraud Recovery	\$52,588	\$0	\$0	\$0	\$0	\$0
128.1 Allowance for Doubtful Accounts - Fraud	-\$6,477	\$0	\$0	\$0	\$0	\$0
129 Accrued Interest Receivable	\$0	\$0	\$0	\$0	\$0	\$0
120 Total Receivables, Net of Allowances for Doubtful Accounts	\$403,978	\$25,909	\$623,613	\$47,323	\$6,147	\$0
131 Investments - Unrestricted	\$0	\$0	\$0	\$0	\$0	\$0
132 Investments - Restricted	\$0	\$0	\$0	\$0	\$0	\$0
135 Investments - Restricted for Payment of Current Liability	\$0	\$0	\$0	\$0	\$0	\$0
142 Prepaid Expenses and Other Assets	\$126,143	\$0	\$30,851	\$883	\$0	\$0
143 Inventories	\$0	\$0	\$0	\$0	\$0	\$0
143.1 Allowance for Obsolete Inventories	\$0	\$0	\$0	\$0	\$0	\$0
144 Inter Program Due From	\$39,649	\$0	\$0	\$0	\$0	\$0
145 Assets Held for Sale	\$10,560	\$0	\$0	\$0	\$0	\$0
150 Total Current Assets	\$8,550,557	\$139,339	\$682,537	\$312,154	\$34,846	\$59,649
161 Land	\$6,470,404	\$0	\$0	\$0	\$0	\$0
162 Buildings	\$168,349,536	\$0	\$0	\$0	\$0	\$0
163 Furniture, Equipment & Machinery - Dwellings	\$4,599,098	\$0	\$0	\$0	\$0	\$0
164 Furniture, Equipment & Machinery - Administration	\$1,802,731	\$0	\$0	\$0	\$0	\$0
165 Leasehold Improvements	\$4,001,802	\$0	\$0	\$0	\$0	\$0
166 Accumulated Depreciation	-\$163,106,334	\$0	\$0	\$0	\$0	\$0
167 Construction in Progress	\$965,361	\$0	\$0	\$0	\$0	\$0
168 Infrastructure	\$0	\$0	\$0	\$0	\$0	\$0
160 Total Capital Assets, Net of Accumulated Depreciation	\$23,082,598	\$0	\$0	\$0	\$0	\$0
171 Notes, Loans and Mortgages Receivable - Non-Current	\$5,967,593	\$0	\$0	\$0	\$0	\$0
172 Notes, Loans, & Mortgages Receivable - Non Current - Past Due	\$0	\$0	\$0	\$0	\$0	\$0
173 Grants Receivable - Non Current	\$0	\$0	\$0	\$0	\$0	\$0
174 Other Assets	\$7,675,690	\$0	\$0	\$0	\$0	\$0
176 Investments in Joint Ventures	\$0	\$0	\$0	\$0	\$0	\$0
180 Total Non-Current Assets	\$36,725,881	\$0	\$0	\$0	\$0	\$0
200 Deferred Outflow of Resources	\$0	\$0	\$0	\$0	\$0	\$0
290 Total Assets and Deferred Outflow of Resources	\$45,276,438	\$139,339	\$682,537	\$312,154	\$34,846	\$59,649

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Balance Sheet Summary

Fiscal Year End: 12/31/2023

	Project Total	14.879 Mainstream Vouchers	14.889 Choice Neighborhoods Implementation Grants	14.239 HOME Investment Partnerships Program	14.238 Shelter Plus Care	14.896 PIH Family Self-Sufficiency Program
311 Bank Overdraft	\$0	\$0	\$0	\$0	\$0	\$0
312 Accounts Payable <= 90 Days	\$617,902	\$0	\$1,600	\$0	\$0	\$1,768
313 Accounts Payable >90 Days Past Due	\$0	\$0	\$0	\$0	\$0	\$0
321 Accrued Wage/Payroll Taxes Payable	\$65,760	\$0	\$6,122	\$0	\$0	\$6,401
322 Accrued Compensated Absences - Current Portion	\$0	\$0	\$0	\$0	\$0	\$0
324 Accrued Contingency Liability	\$0	\$0	\$0	\$0	\$0	\$0
325 Accrued Interest Payable	\$0	\$0	\$0	\$0	\$0	\$0
331 Accounts Payable - HUD PHA Programs	\$0	\$0	\$0	\$0	\$0	\$0
332 Account Payable - PHA Projects	\$0	\$0	\$0	\$0	\$0	\$0
333 Accounts Payable - Other Government	\$0	\$0	\$0	\$0	\$0	\$0
341 Tenant Security Deposits	\$519,097	\$0	\$0	\$0	\$0	\$0
342 Unearned Revenue	\$551,077	\$0	\$0	\$0	\$0	\$0
344 Current Portion of Long-term Debt - Operating Borrowings	\$0	\$0	\$0	\$0	\$0	\$0
344 Current Portion of Long-term Debt - Operating Borrowings	\$0	\$0	\$0	\$0	\$0	\$0
345 Other Current Liabilities	\$261,102	\$0	\$0	\$0	\$0	\$0
346 Accrued Liabilities - Other	\$3,564	\$0	\$0	\$0	\$0	\$0
347 Inter Program - Due To	\$2,981,548	\$10,514	\$719,756	\$239,772	\$0	\$69,812
348 Loan Liability - Current	\$0	\$0	\$0	\$0	\$0	\$0
310 Total Current Liabilities	\$4,720,050	\$10,514	\$727,478	\$239,772	\$0	\$77,981
351 Long-term Debt, Net of Current - Capital Projects/Mortgage Revenue	\$0	\$0	\$0	\$0	\$0	\$0
352 Long-term Debt, Net of Current - Operating Borrowings	\$0	\$0	\$0	\$0	\$0	\$0
353 Non-current Liabilities - Other	\$352,714	\$0	\$0	\$0	\$0	\$0
354 Accrued Compensated Absences - Non Current	\$204,186	\$0	\$16,361	\$0	\$0	\$39,130
355 Loan Liability - Non Current	\$0	\$0	\$0	\$0	\$0	\$0
356 FASB 5 Liabilities	\$0	\$0	\$0	\$0	\$0	\$0
357 Accrued Pension and OPEB Liabilities	\$0	\$0	\$0	\$0	\$0	\$0
350 Total Non-Current Liabilities	\$556,900	\$0	\$16,361	\$0	\$0	\$39,130
300 Total Liabilities	\$5,276,950	\$10,514	\$743,839	\$239,772	\$0	\$117,111
400 Deferred Inflow of Resources	\$2,241,157	\$0	\$0	\$0	\$0	\$0
508.4 Net Investment in Capital Assets	\$23,082,598	\$0	\$0	\$0	\$0	\$0
511.4 Restricted Net Position	\$3,598,541	\$0	\$0	\$0	\$0	\$0
512.4 Unrestricted Net Position	\$11,077,192	\$128,825	-\$61,302	\$72,382	\$34,846	-\$57,462
513 Total Equity - Net Assets / Position	\$37,758,331	\$128,825	-\$61,302	\$72,382	\$34,846	-\$57,462
600 Total Liabilities, Deferred Inflows of Resources and Equity - Net	\$45,276,438	\$139,339	\$682,537	\$312,154	\$34,846	\$59,649

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Balance Sheet Summary

Fiscal Year End: 12/31/2023

	14.870 Resident Opportunity and Supportive Services	14.892 Choice Neighborhoods Planning Grants	1 Business Activities	6.2 Component Unit - Blended	14.871 Housing Choice Vouchers	14.EHV/ Emergency Housing Voucher
111 Cash - Unrestricted	\$42,032	\$27,157	\$96,917	\$781,210	\$1,067,951	\$503,620
112 Cash - Restricted - Modernization and Development	\$0	\$0	\$0	\$0	\$0	
113 Cash - Other Restricted	\$0	\$0	\$190,955	\$640,047	\$558,697	
114 Cash - Tenant Security Deposits	\$0	\$0	\$17,905	\$119,269	\$0	
115 Cash - Restricted for Payment of Current Liabilities	\$0	\$0	\$0	\$0	\$0	
100 Total Cash	\$42,032	\$27,157	\$305,777	\$1,540,526	\$1,626,648	\$503,620
121 Accounts Receivable - PHA Projects	\$0	\$0	\$0	\$0	\$0	
122 Accounts Receivable - HUD Other Projects	\$36,640	\$0	\$0	\$0	\$166,954	
124 Accounts Receivable - Other Government	\$0	\$0	\$0	\$0	\$0	
125 Accounts Receivable - Miscellaneous	\$0	\$302	\$0	\$4,582	\$541,087	\$1,089
126 Accounts Receivable - Tenants	\$0	\$0	\$19,782	\$64,798	\$0	
126.1 Allowance for Doubtful Accounts - Tenants	\$0	\$0	-\$5,015	-\$55,354	\$0	
126.2 Allowance for Doubtful Accounts - Other	\$0	\$0	\$0	\$0	-\$416,515	\$0
127 Notes, Loans, & Mortgages Receivable - Current	\$0	\$0	\$0	\$2,625,492	\$0	
128 Fraud Recovery	\$0	\$0	\$0	\$49,985	\$0	
128.1 Allowance for Doubtful Accounts - Fraud	\$0	\$0	\$0	\$0	\$0	
129 Accrued Interest Receivable	\$0	\$0	\$0	\$0	\$0	
120 Total Receivables, Net of Allowances for Doubtful Accounts	\$36,640	\$302	\$14,767	\$2,689,503	\$291,526	\$1,089
131 Investments - Unrestricted	\$0	\$0	\$0	\$0	\$0	
132 Investments - Restricted	\$0	\$0	\$0	\$0	\$0	
135 Investments - Restricted for Payment of Current Liability	\$0	\$0	\$0	\$0	\$0	
142 Prepaid Expenses and Other Assets	\$5,399	\$0	\$840	\$11,753	\$73,529	\$11,951
143 Inventories	\$0	\$0	\$0	\$0	\$0	
143.1 Allowance for Obsolete Inventories	\$0	\$0	\$0	\$0	\$0	
144 Inter Program Due From	\$0	\$0	\$47,555	\$0	\$48,859	\$5,457
145 Assets Held for Sale	\$0	\$0	\$0	\$0	\$0	
150 Total Current Assets	\$84,071	\$27,459	\$368,939	\$4,241,782	\$2,040,562	\$522,117
161 Land	\$0	\$0	\$2,548	\$1,791,087	\$14,389	
162 Buildings	\$0	\$0	\$27,882	\$30,028,149	\$328,203	
163 Furniture, Equipment & Machinery - Dwellings	\$0	\$0	\$0	\$472,131	\$123,182	
164 Furniture, Equipment & Machinery - Administration	\$0	\$0	\$0	\$126,356	\$2,877	
165 Leasehold Improvements	\$0	\$0	\$0	\$929,034	\$0	
166 Accumulated Depreciation	\$0	\$0	-\$10,811	-\$26,826,038	-\$440,488	
167 Construction in Progress	\$0	\$0	\$0	\$0	\$0	
168 Infrastructure	\$0	\$0	\$0	\$0	\$0	
160 Total Capital Assets, Net of Accumulated Depreciation	\$0	\$0	\$19,619	\$6,520,719	\$28,163	\$0
171 Notes, Loans and Mortgages Receivable - Non-Current	\$0	\$0	\$0	\$594,000	\$0	
172 Notes, Loans, & Mortgages Receivable - Non Current - Past Due	\$0	\$0	\$0	\$0	\$0	
173 Grants Receivable - Non Current	\$0	\$0	\$0	\$0	\$0	
174 Other Assets	\$0	\$0	\$0	\$757,410	\$0	
176 Investments in Joint Ventures	\$0	\$0	\$0	\$2,296,065	\$0	
180 Total Non-Current Assets	\$0	\$0	\$19,619	\$10,168,194	\$28,163	\$0
200 Deferred Outflow of Resources	\$0	\$0	\$0	\$0	\$0	
290 Total Assets and Deferred Outflow of Resources	\$84,071	\$27,459	\$388,558	\$14,409,976	\$2,068,725	\$522,117

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Balance Sheet Summary

Fiscal Year End: 12/31/2023

	14.870 Resident Opportunity and Supportive Services	14.892 Choice Neighborhoods Planning Grants	1 Business Activities	6.2 Component Unit - Blended	14.871 Housing Choice Vouchers	14.EHV/ Emergency Housing Voucher
311 Bank Overdraft	\$0	\$0	\$0	\$0	\$0	
312 Accounts Payable <= 90 Days	\$823	\$0	\$3,852	\$33,297	\$26,915	
313 Accounts Payable >90 Days Past Due	\$0	\$0	\$0	\$0	\$0	
321 Accrued Wage/Payroll Taxes Payable	\$2,795	\$0	\$2,090	\$1,834	\$33,041	
322 Accrued Compensated Absences - Current Portion	\$0	\$0	\$0	\$0	\$0	
324 Accrued Contingency Liability	\$0	\$0	\$0	\$0	\$0	
325 Accrued Interest Payable	\$0	\$0	\$0	\$5,531,699	\$0	
331 Accounts Payable - HUD PHA Programs	\$0	\$0	\$0	\$0	\$0	
332 Account Payable - PHA Projects	\$0	\$0	\$0	\$0	\$0	
333 Accounts Payable - Other Government	\$0	\$0	\$0	\$0	\$0	
341 Tenant Security Deposits	\$0	\$0	\$17,905	\$119,269	\$0	
342 Unearned Revenue	\$0	\$0	\$15,686	\$41,517	\$0	\$0
344 Current Portion of Long-term Debt - Operating Borrowings	\$0	\$0	\$0	\$0	\$0	
344 Current Portion of Long-term Debt - Operating Borrowings	\$0	\$0	\$0	\$2,625,492	\$0	
345 Other Current Liabilities	\$0	\$0	\$0	\$29,927	\$0	
346 Accrued Liabilities - Other	\$0	\$0	\$0	\$0	\$0	
347 Inter Program - Due To	\$84,991	\$27,898	\$135,184	\$1,934,497		\$1,833
348 Loan Liability - Current	\$0	\$0	\$0	\$0	\$0	
310 Total Current Liabilities	\$88,609	\$27,898	\$174,717	\$10,317,532	\$59,956	\$1,833
351 Long-term Debt, Net of Current - Capital Projects/Mortgage Revenue	\$0	\$0	\$0	\$7,363,594	\$0	
352 Long-term Debt, Net of Current - Operating Borrowings	\$0	\$0	\$0	\$0	\$0	
353 Non-current Liabilities - Other	\$0	\$0	\$0	\$9,475	\$539,852	
354 Accrued Compensated Absences - Non Current	\$10,682	\$0	\$0	\$34,737	\$120,102	
355 Loan Liability - Non Current	\$0	\$0	\$0	\$0	\$0	
356 FASB 5 Liabilities	\$0	\$0	\$0	\$0	\$0	
357 Accrued Pension and OPEB Liabilities	\$0	\$0	\$0	\$0	\$0	
350 Total Non-Current Liabilities	\$10,682	\$0	\$0	\$7,407,806	\$659,954	\$0
300 Total Liabilities	\$99,291	\$27,898	\$174,717	\$17,725,338	\$719,910	\$1,833
400 Deferred Inflow of Resources	\$0	\$0	\$0	\$0	\$0	
508.4 Net Investment in Capital Assets	\$0	\$0	\$19,619	\$842,875	\$28,163	
511.4 Restricted Net Position	\$0	\$0	\$190,955	\$640,047	\$0	
512.4 Unrestricted Net Position	-\$15,220	-\$439	\$3,267	-\$3,112,534	\$1,320,652	\$520,284
513 Total Equity - Net Assets / Position	-\$15,220	-\$439	\$213,841	-\$3,315,362	\$1,348,815	\$520,284
600 Total Liabilities, Deferred Inflows of Resources and Equity - Net	\$84,071	\$27,459	\$388,558	\$14,409,976	\$2,068,725	\$522,117

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Balance Sheet Summary

Fiscal Year End: 12/31/2023

	14,856 Lower Income Housing Assistance Program, Section 8 Moderate	COCC	ELIM	Total
111 Cash - Unrestricted	\$11,908	\$578,507		\$7,053,061
112 Cash - Restricted - Modernization and Development	\$0	\$0		\$3,598,541
113 Cash - Other Restricted	\$0	\$0		\$1,792,328
114 Cash - Tenant Security Deposits	\$0	\$0		\$656,271
115 Cash - Restricted for Payment of Current Liabilities	\$0	\$0		\$0
100 Total Cash	\$11,908	\$578,507	\$0	\$13,100,201
121 Accounts Receivable - PHA Projects	\$0	\$0		\$0
122 Accounts Receivable - HUD Other Projects	\$0	\$0		\$203,594
124 Accounts Receivable - Other Government	\$0	\$302		\$651,313
125 Accounts Receivable - Miscellaneous	\$60,447	\$0		\$773,871
126 Accounts Receivable - Tenants	\$0	\$0		\$497,935
126.1 Allowance for Doubtful Accounts - Tenants	\$0	\$0		-\$116,368
126.2 Allowance for Doubtful Accounts - Other	\$0	\$0		-\$540,387
127 Notes, Loans, & Mortgages Receivable - Current	\$0	\$0	-\$2,625,492	\$0
128 Fraud Recovery	\$0	\$0		\$112,573
128.1 Allowance for Doubtful Accounts - Fraud	\$0	\$0		-\$6,477
129 Accrued Interest Receivable	\$0	\$0		\$0
120 Total Receivables, Net of Allowances for Doubtful Accounts	\$60,447	\$302	-\$2,625,492	\$1,576,054
131 Investments - Unrestricted	\$0	\$0		\$0
132 Investments - Restricted	\$0	\$0		\$0
135 Investments - Restricted for Payment of Current Liability	\$0	\$0		\$0
142 Prepaid Expenses and Other Assets	\$0	\$53,014		\$314,363
143 Inventories	\$0	\$0		\$0
143.1 Allowance for Obsolete Inventories	\$0	\$0		\$0
144 Inter Program Due From	\$0	\$5,808,972	-\$5,950,492	\$0
145 Assets Held for Sale	\$0	\$10,000		\$20,560
150 Total Current Assets	\$72,355	\$6,450,795	-\$8,575,984	\$15,011,178
161 Land	\$0	\$156		\$8,278,584
162 Buildings	\$0	\$3,030,559		\$201,764,329
163 Furniture, Equipment & Machinery - Dwellings	\$0	\$6,572		\$5,200,983
164 Furniture, Equipment & Machinery - Administration	\$0	\$591,542		\$2,523,506
165 Leasehold Improvements	\$0	\$0		\$4,930,836
166 Accumulated Depreciation	\$0	-\$1,028,775		-\$191,412,446
167 Construction in Progress	\$0	\$57,231		\$1,022,592
168 Infrastructure	\$0	\$0		\$0
160 Total Capital Assets, Net of Accumulated Depreciation	\$0	\$2,657,285	\$0	\$32,308,384
171 Notes, Loans and Mortgages Receivable - Non-Current	\$0	\$0	-\$6,561,593	\$0
172 Notes, Loans, & Mortgages Receivable - Non Current - Past Due	\$0	\$0		\$0
173 Grants Receivable - Non Current	\$0	\$0		\$0
174 Other Assets	\$0	\$0	-\$5,531,699	\$2,901,401
176 Investments in Joint Ventures	\$0	\$0	-\$2,296,065	\$0
180 Total Non-Current Assets	\$0	\$2,657,285	-\$14,389,357	\$35,209,785
200 Deferred Outflow of Resources	\$0	\$0	\$0	\$0
290 Total Assets and Deferred Outflow of Resources	\$72,355	\$9,108,080	-\$22,965,341	\$50,220,963

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Balance Sheet Summary

Fiscal Year End: 12/31/2023

	14,856 Lower Income Housing Assistance Program, Section 8 Moderate	COCC	ELIM	Total
311 Bank Overdraft	\$0	\$0		\$0
312 Accounts Payable <= 90 Days	\$0	\$33,779		\$719,936
313 Accounts Payable >90 Days Past Due	\$0	\$0		\$0
321 Accrued Wage/Payroll Taxes Payable	\$0	\$65,558		\$183,601
322 Accrued Compensated Absences - Current Portion	\$0	\$0		\$0
324 Accrued Contingency Liability	\$0	\$0		\$0
325 Accrued Interest Payable	\$0	\$0	-\$5,531,699	\$0
331 Accounts Payable - HUD PHA Programs	\$0	\$0		\$0
332 Account Payable - PHA Projects	\$0	\$0		\$0
333 Accounts Payable - Other Government	\$0	\$0		\$0
341 Tenant Security Deposits	\$0	\$0		\$656,271
342 Unearned Revenue	\$0	\$10,938		\$619,218
344 Current Portion of Long-term Debt - Operating Borrowings	\$0	\$48,168		\$48,168
344 Current Portion of Long-term Debt - Operating Borrowings	\$0	\$0	-\$2,625,492	\$0
345 Other Current Liabilities	\$0	\$2,253		\$313,282
346 Accrued Liabilities - Other	\$0	\$0		\$3,564
347 Inter Program - Due To	\$44,687	\$0	-\$5,950,492	\$0
348 Loan Liability - Current	\$0	\$0		\$0
310 Total Current Liabilities	\$44,687	\$160,696	-\$14,107,683	\$2,544,040
351 Long-term Debt, Net of Current - Capital Projects/Mortgage Revenue	\$0	\$1,488,896	-\$6,561,593	\$2,290,897
352 Long-term Debt, Net of Current - Operating Borrowings	\$0	\$0		\$0
353 Non-current Liabilities - Other	\$0	\$0		\$902,041
354 Accrued Compensated Absences - Non Current	\$0	\$294,605		\$719,803
355 Loan Liability - Non Current	\$0	\$0		\$0
356 FASB 5 Liabilities	\$0	\$0		\$0
357 Accrued Pension and OPEB Liabilities	\$0	\$0		\$0
350 Total Non-Current Liabilities	\$0	\$1,783,501	-\$6,561,593	\$3,912,741
300 Total Liabilities	\$44,687	\$1,944,197	-\$20,669,276	\$6,456,781
400 Deferred Inflow of Resources	\$0	\$0	\$0	\$2,241,157
508.4 Net Investment in Capital Assets	\$0	\$1,120,221	\$6,561,593	\$29,969,319
511.4 Restricted Net Position	\$0	\$0		\$4,429,543
512.4 Unrestricted Net Position	\$27,668	\$6,043,662	-\$8,857,658	\$7,124,163
513 Total Equity - Net Assets / Position	\$27,668	\$7,163,883	-\$2,296,065	\$41,523,025
600 Total Liabilities, Deferred Inflows of Resources and Equity - Net	\$72,355	\$9,108,080	-\$22,965,341	\$50,220,963

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	Project Total	14.879 Mainstream Vouchers	14.889 Choice Neighborhoods Implementation Grants	14.239 HOME Investment Partnerships Program	14.238 Shelter Plus Care	14.896 PIH Family Self-Sufficiency Program
70300 Net Tenant Rental Revenue	\$6,858,759	\$0	\$0	\$0	\$0	\$0
70400 Tenant Revenue - Other	\$498,229	\$0	\$0	\$0	\$0	\$0
70500 Total Tenant Revenue	\$7,356,988	\$0	\$0	\$0	\$0	\$0
70600 HUD PHA Operating Grants	\$14,760,538	\$791,148	\$0	\$0	\$0	\$426,972
70610 Capital Grants	\$1,941,351					
70710 Management Fee						
70720 Asset Management Fee						
70730 Book Keeping Fee						
70740 Front Line Service Fee						
70750 Other Fees						
70700 Total Fee Revenue						
70800 Other Government Grants	\$0	\$0	\$869,875	\$175,836	\$0	\$0
71100 Investment Income - Unrestricted	\$248,570	\$0	\$0	\$0	\$0	\$0
71200 Mortgage Interest Income	\$55,475	\$0	\$0	\$0	\$0	\$0
71300 Proceeds from Disposition of Assets Held for Sale	\$0	\$0	\$0	\$0	\$0	\$0
71310 Cost of Sale of Assets	\$0	\$0	\$0	\$0	\$0	\$0
71400 Fraud Recovery	\$16,651	\$0	\$0	\$0	\$0	\$0
71500 Other Revenue	\$698,883	\$0	\$0	\$17,584	\$0	\$0
71600 Gain or Loss on Sale of Capital Assets	\$0	\$0	\$0	\$0	\$0	\$0
72000 Investment Income - Restricted	\$0	\$0	\$0	\$0	\$0	\$0
70000 Total Revenue	\$25,078,456	\$791,148	\$869,875	\$193,420	\$0	\$426,972
91100 Administrative Salaries	\$988,306	\$52,013	\$349,637	\$0	\$0	\$284,714
91200 Auditing Fees	\$65,454	\$1,224	\$106	\$0	\$0	\$41
91300 Management Fee	\$1,205,722	\$0	\$0	\$0	\$0	\$0
91310 Book-keeping Fee	\$159,665	\$0	\$0	\$0	\$0	\$0
91400 Advertising and Marketing	\$0	\$0	\$0	\$0	\$0	\$0
91500 Employee Benefit contributions - Administrative	\$300,422	\$17,384	\$79,008	\$0	\$0	\$77,041
91600 Office Expenses	\$472,235	\$17,559	\$5,356	\$2,262	\$0	\$55,731
91700 Legal Expense	\$144,846	\$0	\$17,718	\$0	\$0	\$0
91800 Travel	\$30	\$0	\$51	\$0	\$0	\$0
91810 Allocated Overhead	\$0	\$0	\$0	\$0	\$0	\$0
91900 Other	\$595,365	\$11	\$0	\$0	\$0	\$0
91000 Total Operating - Administrative	\$3,932,045	\$88,191	\$451,876	\$2,262	\$0	\$417,527
92000 Asset Management Fee	\$0	\$0	\$0	\$0	\$0	\$0
92100 Tenant Services - Salaries	\$120,478	\$0	\$0	\$0	\$0	\$0
92200 Relocation Costs	\$18,149	\$0	\$136,934	\$0	\$0	\$0
92300 Employee Benefit Contributions - Tenant Services	\$5,679	\$0	\$0	\$0	\$0	\$0
92400 Tenant Services - Other	\$2,038,377	\$120	\$91,485	\$0	\$0	\$346
92500 Total Tenant Services	\$2,182,683	\$120	\$228,419	\$0	\$0	\$346
93100 Water	\$430,173	\$0	\$0	\$0	\$0	\$0
93200 Electricity	\$1,638,507	\$0	\$0	\$0	\$0	\$0
93300 Gas	\$572,431	\$0	\$0	\$0	\$0	\$0
93400 Fuel	\$0	\$0	\$0	\$0	\$0	\$0
93500 Labor	\$0	\$0	\$0	\$0	\$0	\$0
93600 Sewer	\$2,359	\$0	\$0	\$0	\$0	\$0
93700 Employee Benefit Contributions - Utilities	\$0	\$0	\$0	\$0	\$0	\$0
93800 Other Utilities Expense	\$567,182	\$0	\$0	\$0	\$0	\$0
93000 Total Utilities	\$3,210,652	\$0	\$0	\$0	\$0	\$0

See report of independent auditors.

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	Project Total	14.879 Mainstream Vouchers	14.889 Choice Neighborhoods Implementation Grants	14.239 HOME Investment Partnerships Program	14.238 Shelter Plus Care	14.896 PIH Family Self-Sufficiency Program
94100 Ordinary Maintenance and Operations - Labor	\$2,784,197	\$5,935	\$0	\$0	\$0	\$0
94200 Ordinary Maintenance and Operations - Materials and Other	\$749,678	\$94	\$0	\$0	\$0	\$0
94300 Ordinary Maintenance and Operations Contracts	\$6,414,489	\$808	\$3,150	\$0	\$0	\$0
94500 Employee Benefit Contributions - Ordinary Maintenance	\$891,387	\$2,262	\$0	\$0	\$0	\$0
94000 Total Maintenance	\$10,839,751	\$9,099	\$3,150	\$0	\$0	\$0
95100 Protective Services - Labor	\$0	\$0	\$0	\$0	\$0	\$0
95200 Protective Services - Other Contract Costs	\$413,407	\$0	\$0	\$0	\$0	\$0
95300 Protective Services - Other	\$147,105	\$0	\$0	\$0	\$0	\$0
95500 Employee Benefit Contributions - Protective Services	\$0	\$0	\$0	\$0	\$0	\$0
95000 Total Protective Services	\$560,512	\$0	\$0	\$0	\$0	\$0
96110 Property Insurance	\$643,026	\$0	\$5,040	\$0	\$0	\$0
96120 Liability Insurance	\$185,986	\$112	\$687	\$0	\$0	\$1,638
96130 Workmen's Compensation	\$104,924	\$369	\$4,735	\$0	\$0	\$7,461
96140 All Other Insurance	\$2,040	\$0	\$0	\$0	\$0	\$0
96100 Total Insurance Premiums	\$935,976	\$481	\$10,462	\$0	\$0	\$9,099
96200 Other General Expenses	\$740,797	\$0	\$0	\$0	\$0	\$0
96210 Compensated Absences	\$0	\$0	\$0	\$0	\$0	\$0
96300 Payments in Lieu of Taxes	\$0	\$0	\$0	\$0	\$0	\$0
96400 Bad debt - Tenant Rents	\$472,667	\$0	\$0	\$0	\$0	\$0
96500 Bad debt - Mortgages	\$0	\$0	\$0	\$0	\$0	\$0
96600 Bad debt - Other	\$0	\$0	\$0	\$0	\$0	\$0
96800 Severance Expense	\$0	\$0	\$0	\$0	\$0	\$0
96000 Total Other General Expenses	\$1,213,464	\$0	\$0	\$0	\$0	\$0
96710 Interest of Mortgage (or Bonds) Payable	\$0	\$0	\$0	\$0	\$0	\$0
96720 Interest on Notes Payable (Short and Long Term)	\$0	\$0	\$0	\$0	\$0	\$0
96730 Amortization of Bond Issue Costs	\$0	\$0	\$0	\$0	\$0	\$0
96700 Total Interest Expense and Amortization Cost	\$0	\$0	\$0	\$0	\$0	\$0
96900 Total Operating Expenses	\$22,875,083	\$97,891	\$693,907	\$2,262	\$0	\$426,972
97000 Excess of Operating Revenue over Operating Expenses	\$2,203,373	\$693,257	\$175,968	\$191,158	\$0	\$0
97100 Extraordinary Maintenance	\$0	\$0	\$0	\$0	\$0	\$0
97200 Casualty Losses - Non-capitalized	\$0	\$0	\$0	\$0	\$0	\$0
97300 Housing Assistance Payments	\$0	\$729,104	\$0	\$174,076	\$0	\$0
97350 HAP Portability-In	\$941	\$0	\$0	\$0	\$0	\$0
97400 Depreciation Expense	\$2,182,956	\$0	\$0	\$0	\$0	\$0
97500 Fraud Losses	\$0	\$0	\$0	\$0	\$0	\$0
97600 Capital Outlays - Governmental Funds						
97700 Debt Principal Payment - Governmental Funds						
97800 Dwelling Units Rent Expense	\$0	\$0	\$0	\$0	\$0	\$0
90000 Total Expenses	\$25,058,980	\$826,995	\$693,907	\$176,338	\$0	\$426,972

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	Project Total	14.879 Mainstream Vouchers	14.889 Choice Neighborhoods Implementation Grants	14.239 HOME Investment Partnerships Program	14.238 Shelter Plus Care	14.896 PIH Family Self-Sufficiency Program
10010 Operating Transfer In	\$1,793,301	\$0	\$0	\$0	\$0	\$0
10020 Operating transfer Out	-\$1,793,301	\$0	\$0	\$0	\$0	\$0
10030 Operating Transfers from/to Primary Government	\$0	\$0	\$0	\$0	\$0	\$0
10040 Operating Transfers from/to Component Unit	\$0	\$0	\$0	\$0	\$0	\$0
10050 Proceeds from Notes, Loans and Bonds						
10060 Proceeds from Property Sales						
10070 Extraordinary Items, Net Gain/Loss	\$0	\$0	\$0	\$0	\$0	\$0
10080 Special Items (Net Gain/Loss)	\$0	\$0	\$0	\$0	\$0	\$0
10091 Inter Project Excess Cash Transfer In	\$0					
10092 Inter Project Excess Cash Transfer Out	\$0					
10093 Transfers between Program and Project - In	\$0	\$0	\$0	\$0	\$0	\$0
10094 Transfers between Project and Program - Out	\$0	\$0	\$0	\$0	\$0	\$0
10100 Total Other financing Sources (Uses)	\$0	\$0	\$0	\$0	\$0	\$0
10000 Excess (Deficiency) of Total Revenue Over (Under) Total Expenses	\$19,476	-\$35,847	\$175,968	\$17,082	\$0	\$0
11020 Required Annual Debt Principal Payments	\$0	\$0	\$0	\$0	\$0	\$0
11030 Beginning Equity	\$37,237,231	\$164,672	-\$237,686	\$55,300	\$34,846	-\$52,688
11040 Prior Period Adjustments, Equity Transfers and Correction of Errors	\$501,624	\$0	\$416	\$0	\$0	-\$4,774
11050 Changes in Compensated Absence Balance						
11060 Changes in Contingent Liability Balance						
11070 Changes in Unrecognized Pension Transition Liability						
11080 Changes in Special Term/Severance Benefits Liability						
11090 Changes in Allowance for Doubtful Accounts - Dwelling Rents						
11100 Changes in Allowance for Doubtful Accounts - Other						
11170 Administrative Fee Equity						
11180 Housing Assistance Payments Equity						
11190 Unit Months Available	32493	1184	0	440	0	0
11210 Number of Unit Months Leased	29266	1184	0	440	0	0

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	14.870 Resident Opportunity and Supportive Services	14.892 Choice Neighborhoods Planning Grants	1 Business Activities	6.2 Component Unit Blended	14.871 Housing Choice Vouchers	14.EHV Emergency Housing Voucher
70300 Net Tenant Rental Revenue	\$0	\$0	\$283,645	\$1,595,425	\$0	
70400 Tenant Revenue - Other	\$0	\$0	\$13,985	\$112,948	\$0	
70500 Total Tenant Revenue	\$0	\$0	\$297,630	\$1,708,373	\$0	\$0
70600 HUD PHA Operating Grants	\$272,106	\$0	\$0	\$0	\$41,314,328	\$1,221,227
70610 Capital Grants					\$0	
70710 Management Fee						
70720 Asset Management Fee						
70730 Book Keeping Fee						
70740 Front Line Service Fee						
70750 Other Fees			\$0			
70700 Total Fee Revenue						
70800 Other Government Grants	\$0	\$0	\$0	\$3,500	\$0	
71100 Investment Income - Unrestricted	\$0	\$0	\$1,693	\$8,475	\$304	
71200 Mortgage Interest Income	\$0	\$0	\$0	\$0	\$0	
71300 Proceeds from Disposition of Assets Held for Sale	\$0	\$0	\$0	\$0	\$0	
71310 Cost of Sale of Assets	\$0	\$0	\$0	\$0	\$0	
71400 Fraud Recovery	\$0	\$0	\$0	\$5,364	\$3,826	
71500 Other Revenue	\$0	\$0	\$132,422	\$348,212	\$72,427	
71600 Gain or Loss on Sale of Capital Assets	\$0	\$0	\$0	\$0	\$0	
72000 Investment Income - Restricted	\$0	\$0	\$0	\$0	\$0	
70000 Total Revenue	\$272,106	\$0	\$431,745	\$2,073,924	\$41,390,885	\$1,221,227
91100 Administrative Salaries	\$188,810	\$0	\$10,293	\$76,683	\$1,254,604	
91200 Auditing Fees	\$41	\$0	\$5,200	\$4,519	\$43,362	
91300 Management Fee	\$0	\$0	\$0	\$128,817	\$608,339	\$16,364
91310 Book-keeping Fee	\$0	\$0	\$0	\$17,116	\$379,950	\$8,100
91400 Advertising and Marketing	\$0	\$0	\$0	\$0	\$0	
91500 Employee Benefit contributions - Administrative	\$79,364	\$0	\$3,975	\$26,873	\$412,336	
91600 Office Expenses	\$16,858	\$0	\$19,103	\$98,261	\$494,962	\$337
91700 Legal Expense	\$0	\$0	\$1,076	\$15,305	\$0	
91800 Travel	\$0	\$0	\$0	\$0	\$0	
91810 Allocated Overhead	\$0	\$0	\$0	\$0	\$0	
91900 Other	\$0	\$0	\$47,743	\$7,222	\$258	
91000 Total Operating - Administrative	\$285,073	\$0	\$87,390	\$374,796	\$3,193,811	\$24,801
92000 Asset Management Fee	\$0	\$0	\$0	\$0	\$0	
92100 Tenant Services - Salaries	\$0	\$0	\$0	\$0	\$0	
92200 Relocation Costs	\$0	\$0	\$7,856	\$395	\$7,371	\$11,326
92300 Employee Benefit Contributions - Tenant Services	\$0	\$0	\$0	\$0	\$0	
92400 Tenant Services - Other	\$0	\$0	\$91,454	\$146,486	\$2,846	
92500 Total Tenant Services	\$0	\$0	\$99,310	\$146,881	\$10,217	\$11,326
93100 Water	\$0	\$0	\$10,855	\$29,007	\$0	
93200 Electricity	\$0	\$0	\$3,152	\$26,536	\$0	
93300 Gas	\$0	\$0	\$6,804	\$4,237	\$0	
93400 Fuel	\$0	\$0	\$0	\$0	\$0	
93500 Labor	\$0	\$0	\$0	\$0	\$0	
93600 Sewer	\$0	\$0	\$0	\$0	\$0	
93700 Employee Benefit Contributions - Utilities	\$0	\$0	\$0	\$0	\$0	
93800 Other Utilities Expense	\$0	\$0	\$14,946	\$44,546	\$0	
93000 Total Utilities	\$0	\$0	\$35,757	\$104,326	\$0	\$0

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	14.870 Resident Opportunity and Supportive Services	14.892 Choice Neighborhoods Planning Grants	1 Business Activities	6.2 Component Unit Blended	14.871 Housing Choice Vouchers	14.EHV Emergency Housing Voucher
94100 Ordinary Maintenance and Operations - Labor	\$0	\$0	\$32,303	\$349,705	\$224,221	
94200 Ordinary Maintenance and Operations - Materials and Other	\$0	\$0	\$6,569	\$85,709	\$8,276	
94300 Ordinary Maintenance and Operations Contracts	\$0	\$0	\$81,235	\$382,065	\$16,473	
94500 Employee Benefit Contributions - Ordinary Maintenance	\$0	\$0	\$23,177	\$85,692	\$64,856	
94000 Total Maintenance	\$0	\$0	\$143,284	\$903,171	\$313,826	\$0
95100 Protective Services - Labor	\$0	\$0	\$297	\$0	\$0	
95200 Protective Services - Other Contract Costs	\$188	\$0	\$0	\$10,936	\$0	
95300 Protective Services - Other	\$0	\$0	\$192	\$51,441	\$0	
95500 Employee Benefit Contributions - Protective Services	\$0	\$0	\$0	\$0	\$0	
95000 Total Protective Services	\$188	\$0	\$489	\$62,377	\$0	\$0
96110 Property Insurance	\$0	\$0	\$14,425	\$122,346	\$2,962	
96120 Liability Insurance	\$0	\$0	\$8,176	\$70,769	\$17,839	
96130 Workmen's Compensation	\$5,321	\$0	\$1,280	\$9,278	\$44,333	
96140 All Other Insurance	\$0	\$0	\$0	\$0	\$0	
96100 Total Insurance Premiums	\$5,321	\$0	\$23,881	\$202,393	\$65,134	\$0
96200 Other General Expenses	\$0	\$0	\$0	\$12,344	\$0	
96210 Compensated Absences	\$0	\$0	\$0	\$0	\$0	
96300 Payments in Lieu of Taxes	\$0	\$0	\$0	\$0	\$0	
96400 Bad debt - Tenant Rents	\$0	\$0	\$13,849	\$71,759	\$0	
96500 Bad debt - Mortgages	\$0	\$0	\$0	\$0	\$0	
96600 Bad debt - Other	\$0	\$0	\$0	\$0	\$0	
96800 Severance Expense	\$0	\$0	\$0	\$0	\$0	
96000 Total Other General Expenses	\$0	\$0	\$13,849	\$84,103	\$0	\$0
96710 Interest of Mortgage (or Bonds) Payable	\$0	\$0	\$0	\$50,497	\$0	
96720 Interest on Notes Payable (Short and Long Term)	\$0	\$0	\$0	\$0	\$0	
96730 Amortization of Bond Issue Costs	\$0	\$0	\$0	\$0	\$0	
96700 Total Interest Expense and Amortization Cost	\$0	\$0	\$0	\$50,497	\$0	\$0
96900 Total Operating Expenses	\$290,582	\$0	\$403,960	\$1,928,544	\$3,582,988	\$36,127
97000 Excess of Operating Revenue over Operating Expenses	\$18,476	\$0	\$27,785	\$145,380	\$37,807,897	\$1,185,100
97100 Extraordinary Maintenance	\$0	\$0	\$0	\$0	\$0	
97200 Casualty Losses - Non-capitalized	\$0	\$0	\$0	\$0	\$0	
97300 Housing Assistance Payments	\$0	\$0	\$0	\$0	\$37,336,443	\$971,441
97350 HAP Portability-In	\$0	\$0	\$0	\$0	\$0	
97400 Depreciation Expense	\$0	\$0	\$734	\$734,004	\$15,510	
97500 Fraud Losses	\$0	\$0	\$0	\$0	\$0	
97600 Capital Outlays - Governmental Funds						
97700 Debt Principal Payment - Governmental Funds						
97800 Dwelling Units Rent Expense	\$0	\$0	\$0	\$0	\$0	
90000 Total Expenses	\$290,582	\$0	\$404,694	\$2,662,548	\$40,934,941	\$1,007,568

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	14.870 Resident Opportunity and Supportive Services	14.892 Choice Neighborhoods Planning Grants	1 Business Activities	6.2 Component Unit Blended	14.871 Housing Choice Vouchers	14.EHV Emergency Housing Voucher
10010 Operating Transfer In	\$0	\$0	\$0	\$0	\$0	
10020 Operating transfer Out	\$0	\$0	\$0	\$0	\$0	
10030 Operating Transfers from/to Primary Government	\$0	\$0	\$0	\$0	\$0	
10040 Operating Transfers from/to Component Unit	\$0	\$0	\$0	\$0	\$0	
10050 Proceeds from Notes, Loans and Bonds						
10060 Proceeds from Property Sales						
10070 Extraordinary Items, Net Gain/Loss	\$0	\$0	\$0	\$0	\$0	
10080 Special Items (Net Gain/Loss)	\$0	\$0	\$0	\$0	\$0	
10091 Inter Project Excess Cash Transfer In						
10092 Inter Project Excess Cash Transfer Out						
10093 Transfers between Program and Project - In	\$0	\$0	\$0	\$0	\$0	
10094 Transfers between Project and Program - Out	\$0	\$0	\$0	\$0	\$0	
10100 Total Other financing Sources (Uses)	\$0	\$0	\$0	\$0	\$0	\$0
10000 Excess (Deficiency) of Total Revenue Over (Under) Total Expenses	-\$18,476	\$0	\$27,051	-\$588,624	\$455,944	\$213,659
11020 Required Annual Debt Principal Payments	\$0	\$0	\$0	\$20,250	\$0	\$0
11030 Beginning Equity	-\$33	-\$439	\$188,098	-\$2,400,380	\$892,871	\$306,625
11040 Prior Period Adjustments, Equity Transfers and Correction of Errors	\$3,289	\$0	-\$1,308	-\$326,358	\$0	\$0
11050 Changes in Compensated Absence Balance						
11060 Changes in Contingent Liability Balance						
11070 Changes in Unrecognized Pension Transition Liability						
11080 Changes in Special Term/Severance Benefits Liability						
11090 Changes in Allowance for Doubtful Accounts - Dwelling Rents						
11100 Changes in Allowance for Doubtful Accounts - Other						
11170 Administrative Fee Equity					\$1,348,815	
11180 Housing Assistance Payments Equity					\$0	
11190 Unit Months Available	0	0	0	836	56396	1391
11210 Number of Unit Months Leased	0	0	0	836	48738	1287

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	14,856 Lower Income Housing Assistance Program_Section 8 Moderate	COCC	ELIM	Total
70300 Net Tenant Rental Revenue	\$0	\$23,502	-\$487,531	\$8,273,800
70400 Tenant Revenue - Other	\$0	\$129,572		\$754,734
70500 Total Tenant Revenue	\$0	\$153,074	-\$487,531	\$9,028,534
70600 HUD PHA Operating Grants	\$546,513	\$0		\$59,332,832
70610 Capital Grants	\$0	\$0		\$1,941,351
70710 Management Fee	\$0	\$1,961,745	-\$1,961,745	\$0
70720 Asset Management Fee	\$0	\$0	\$0	\$0
70730 Book Keeping Fee	\$0	\$569,580	-\$569,580	\$0
70740 Front Line Service Fee	\$0	\$0		\$0
70750 Other Fees	\$0	\$2,896,739	-\$2,896,739	\$0
70700 Total Fee Revenue	\$0	\$5,428,064	-\$5,428,064	\$0
70800 Other Government Grants	\$0	\$0		\$1,049,211
71100 Investment Income - Unrestricted	\$0	\$4,132		\$263,174
71200 Mortgage Interest Income	\$0	\$0	-\$55,475	\$0
71300 Proceeds from Disposition of Assets Held for Sale	\$0	\$0		\$0
71310 Cost of Sale of Assets	\$0	\$0		\$0
71400 Fraud Recovery	\$0	\$0		\$25,841
71500 Other Revenue	\$0	\$67,218		\$1,336,746
71600 Gain or Loss on Sale of Capital Assets	\$0	\$488,881		\$488,881
72000 Investment Income - Restricted	\$0	\$0		\$0
70000 Total Revenue	\$546,513	\$6,141,369	-\$5,971,070	\$73,466,570
91100 Administrative Salaries	\$33,511	\$3,849,293		\$7,087,864
91200 Auditing Fees	\$976	\$10,625		\$131,548
91300 Management Fee	\$8,940		-\$1,961,745	\$6,437
91310 Book-keeping Fee	\$5,588		-\$569,580	\$839
91400 Advertising and Marketing	\$0	\$3,682		\$3,682
91500 Employee Benefit contributions - Administrative	\$10,706	\$1,189,140		\$2,196,249
91600 Office Expenses	\$15,880	\$630,821		\$1,829,365
91700 Legal Expense	\$0	\$83,413		\$262,358
91800 Travel	\$0	\$6,115		\$6,196
91810 Allocated Overhead	\$0			\$0
91900 Other	\$7	\$2,249	-\$567,424	\$85,431
91000 Total Operating - Administrative	\$75,608	\$5,775,338	-\$3,098,749	\$11,609,969
92000 Asset Management Fee	\$0		\$0	\$0
92100 Tenant Services - Salaries	\$0	\$8,709		\$129,187
92200 Relocation Costs	\$0	\$10,289		\$192,320
92300 Employee Benefit Contributions - Tenant Services	\$0	\$20,181		\$25,860
92400 Tenant Services - Other	\$34	\$36,999	-\$2,045,119	\$363,028
92500 Total Tenant Services	\$34	\$76,178	-\$2,045,119	\$710,395
93100 Water	\$0	\$1,353		\$471,388
93200 Electricity	\$0	\$40,699		\$1,708,894
93300 Gas	\$0	\$5,777		\$589,249
93400 Fuel	\$0	\$0		\$0
93500 Labor	\$0	\$0		\$0
93600 Sewer	\$0	\$0		\$2,359
93700 Employee Benefit Contributions - Utilities	\$0	\$0		\$0
93800 Other Utilities Expense	\$0	\$1,928		\$628,602
93000 Total Utilities	\$0	\$49,757	\$0	\$3,400,492

See report of independent auditors.

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	14.856 Lower Income Housing Assistance Program_Section 8 Moderate	COC	ELIM	Total
94100 Ordinary Maintenance and Operations - Labor	\$3,769	\$110,991		\$3,511,121
94200 Ordinary Maintenance and Operations - Materials and Other	\$74	-\$20,591		\$829,809
94300 Ordinary Maintenance and Operations Contracts	\$521	\$32,211		\$6,930,952
94500 Employee Benefit Contributions - Ordinary Maintenance	\$1,346	\$128,602		\$1,197,322
94000 Total Maintenance	\$5,710	\$251,213	\$0	\$12,469,204
95100 Protective Services - Labor	\$0	\$283,899	-\$284,196	\$0
95200 Protective Services - Other Contract Costs	\$40	\$18,014		\$442,585
95300 Protective Services - Other	\$184	\$4,929		\$203,851
95500 Employee Benefit Contributions - Protective Services	\$0	\$71,294		\$71,294
95000 Total Protective Services	\$224	\$378,136	-\$284,196	\$717,730
96110 Property Insurance	\$0	\$18,505		\$806,304
96120 Liability Insurance	\$0	\$60,855		\$346,062
96130 Workmen's Compensation	\$0	\$127,136		\$304,837
96140 All Other Insurance	\$0	\$0		\$2,040
96100 Total Insurance Premiums	\$0	\$206,496	\$0	\$1,459,243
96200 Other General Expenses	\$42,680	\$38,285	-\$487,531	\$346,575
96210 Compensated Absences	\$0	\$0		\$0
96300 Payments in Lieu of Taxes	\$0	\$0		\$0
96400 Bad debt - Tenant Rents	\$0	\$10,251		\$568,526
96500 Bad debt - Mortgages	\$0	\$0		\$0
96600 Bad debt - Other	\$0	\$0		\$0
96800 Severance Expense	\$0	\$0		\$0
96000 Total Other General Expenses	\$42,680	\$48,536	-\$487,531	\$915,101
96710 Interest of Mortgage (or Bonds) Payable	\$0	\$76,648	-\$55,475	\$71,670
96720 Interest on Notes Payable (Short and Long Term)	\$0	\$0		\$0
96730 Amortization of Bond Issue Costs	\$0	\$0		\$0
96700 Total Interest Expense and Amortization Cost	\$0	\$76,648	-\$55,475	\$71,670
96900 Total Operating Expenses	\$124,256	\$6,862,302	-\$5,971,070	\$31,353,804
97000 Excess of Operating Revenue over Operating Expenses	\$422,257	-\$720,933	\$0	\$42,112,766
97100 Extraordinary Maintenance	\$0	\$0		\$0
97200 Casualty Losses - Non-capitalized	\$0	\$0		\$0
97300 Housing Assistance Payments	\$512,610	\$0		\$39,723,674
97350 HAP Portability-In	\$0	\$0		\$941
97400 Depreciation Expense	\$0	\$215,796		\$3,149,000
97500 Fraud Losses	\$0	\$0		\$0
97600 Capital Outlays - Governmental Funds	\$0			
97700 Debt Principal Payment - Governmental Funds	\$0			
97800 Dwelling Units Rent Expense	\$0	\$0		\$0
90000 Total Expenses	\$636,866	\$7,078,098	-\$5,971,070	\$74,227,419

Omaha Housing Authority (NE001)

Omaha, NE

Submission Type: Audited/Single Audit

Entity Wide Revenue and Expense Summary

Fiscal Year End: 12/31/2023

	14.856 Lower Income Housing Assistance Program_Section 8 Moderate	COCC	ELIM	Total
10010 Operating Transfer In	\$0	\$0	-\$1,793,301	\$0
10020 Operating transfer Out	\$0	\$0	\$1,793,301	\$0
10030 Operating Transfers from/to Primary Government	\$0	\$0		\$0
10040 Operating Transfers from/to Component Unit	\$0	\$0		\$0
10050 Proceeds from Notes, Loans and Bonds	\$0			
10060 Proceeds from Property Sales	\$0			
10070 Extraordinary Items, Net Gain/Loss	\$0	\$0		\$0
10080 Special Items (Net Gain/Loss)	\$0	\$0		\$0
10091 Inter Project Excess Cash Transfer In	\$0			\$0
10092 Inter Project Excess Cash Transfer Out	\$0			\$0
10093 Transfers between Program and Project - In	\$0	\$0		\$0
10094 Transfers between Project and Program - Out	\$0	\$0		\$0
10100 Total Other financing Sources (Uses)	\$0	\$0	\$0	\$0
10000 Excess (Deficiency) of Total Revenue Over (Under) Total Expenses	-\$90,353	-\$936,729	\$0	-\$760,849
11020 Required Annual Debt Principal Payments	\$0	\$9,593		\$29,843
11030 Beginning Equity	\$118,021	\$8,273,501		\$44,579,939
11040 Prior Period Adjustments, Equity Transfers and Correction of Errors	\$0	-\$172,889	\$0	\$0
11050 Changes in Compensated Absence Balance	\$0			
11060 Changes in Contingent Liability Balance	\$0			
11070 Changes in Unrecognized Pension Transition Liability	\$0			
11080 Changes in Special Term/Severance Benefits Liability	\$0			
11090 Changes in Allowance for Doubtful Accounts - Dwelling Rents	\$0			
11100 Changes in Allowance for Doubtful Accounts - Other	\$0			
11170 Administrative Fee Equity	\$0			\$1,348,815
11180 Housing Assistance Payments Equity	\$0			\$0
11190 Unit Months Available	1365	0		94105
11210 Number of Unit Months Leased	1365	0		83116

RESOLUTION NO. 2024 – 121
FY 2023 AUDIT REPORTS

WHEREAS, HUD regulations require a third-party audit of OHA’s financial reports annually;

WHEREAS, OHA contracted with Novogradac & Company LLP to perform the audit of OHA’s and HIO’s consolidated financial reports for FY 2023;

WHEREAS, Novogradac & Company LLP completed its audit of OHA’s FY 2023 financial reports and presented its audit report to OHA staff; and

WHEREAS, OHA staff recommends that the Board of Commissioners of the Housing Authority of the City of Omaha acknowledge for the public record its receipt and acceptance of the Novogradac & Company LLP audit of OHA’s FY 2023 financial reports;

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Commissioners of the Housing Authority of the City of Omaha hereby acknowledges for the public record its receipt and acceptance of the Novogradac & Company LLP audit of OHA’s FY 2023 financial reports.

David Levy, Chairman
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held December 19, 2024.

Joanie Balk, Secretary
Housing Authority of the City of Omaha

6.2.7. Resolution 2024-122 Delegation of Authority to CEO

RESOLUTION NO. 2024-122
DELEGATION OF AUTHORITY TO JOAN BALK
AS CHIEF EXECUTIVE OFFICER

WHEREAS, The Board of Commissioners of the Housing Authority of the City of Omaha appointed Joan (Joanie) Poore as the Chief Executive Officer of OHA effective June 3, 2019.

WHEREAS, a legal name change from Joan M. Poore to Joan M. Balk did occur effective November 22, 2024.

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Commissioners of the Housing Authority of the City of Omaha hereby authorizes all actions of the Chief Executive Officer performed and executed by Joan (Joanie) Balk.

David Levy, Chairman
OHA Board of Commissioners

ATTEST

I, Brian Hansen, General Counsel of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at a meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held December 19, 2024.

Brian Hansen, General Counsel
Housing Authority of the City of Omaha

6.2.8. Resolution 2024-123 Move March 6, 2024 Board Meeting to February 27,
2024

RESOLUTION NO. 2024 – 123
RESOLUTION TO CHANGE MARCH 2024 BOARD MEETING DATE

WHEREAS, the OHA Bylaws require that the Board of Commissioners meet for a regular monthly meeting on the first Thursday of the month, unless a majority of the Commissioners determine that the meeting be moved to a different date and/or time.

WHEREAS, the regular March 2024 meeting of the OHA Board of Commissioners is scheduled to occur on March 6, 2025, meeting of the OHA Board of Commissioners is scheduled to occur on February 27, 2025; and

WHEREAS, by vote of a majority of the Commissioners it has been determined that such meeting shall be held on February 27, 2025, at 8:30 a.m.

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Commissioners of the Housing Authority of the City of Omaha hereby determines that the March 2025 meeting of the Board of Commissioners shall be held on February 27, 2025, at 8:30 a.m.

David Levy, Chairperson
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held December 19, 2024.

Joanie Balk, Secretary
Housing Authority of the City of Omaha

6.2.9. Resolution 2024-124 Capital Improvements Five Year Action Plan 2025-2029

Capital Fund Program - Five-Year Action Plan

Status: Draft

Approval Date:

Approved By:

Part I: Summary						
PHA Name : Omaha Housing Authority		Locality (City/County & State) ☒ Original 5-Year Plan ☐ Revised 5-Year Plan (Revision No:)				
PHA Number: NE001						
A.	Development Number and Name	Work Statement for Year 1 2025	Work Statement for Year 2 2026	Work Statement for Year 3 2027	Work Statement for Year 4 2028	Work Statement for Year 5 2029
	AUTHORITY-WIDE	\$2,785,000.00	\$2,730,000.00	\$2,670,300.00	\$2,730,000.00	\$2,875,000.00
	CROWN I (NE001000025)	\$36,350.00	\$38,600.00	\$53,600.00	\$38,600.00	\$38,600.00
	PARK VILLA (NE001000031)	\$19,300.00	\$33,600.00	\$33,600.00	\$53,600.00	\$33,600.00
	BAYVIEW APARTMENTS (NE001000027)	\$21,800.00	\$36,100.00	\$51,100.00	\$36,100.00	\$36,100.00
	JACKSON TOWER (NE001000013)	\$214,600.00	\$291,400.00	\$261,400.00	\$141,400.00	\$121,400.00
	KAY JAY TOWER (NE001000005)	\$2,953,600.00	\$1,117,600.00	\$85,400.00	\$105,400.00	\$85,400.00
	EVANS TOWER (NE001000006)	\$95,800.00	\$107,600.00	\$82,600.00	\$102,600.00	\$82,600.00
	PARK SOUTH (NE001000008)	\$237,700.00	\$147,000.00	\$3,027,000.00	\$3,207,300.00	\$127,000.00
	BENSON TOWER (NE001000009)	\$109,000.00	\$120,800.00	\$95,800.00	\$115,800.00	\$2,845,800.00
	PINE TOWER (NE001000010)	\$56,800.00	\$108,600.00	\$68,600.00	\$88,600.00	\$68,600.00

Capital Fund Program - Five-Year Action Plan

Status: Draft

Approval Date:

Approved By:

Part I: Summary						
PHA Name : Omaha Housing Authority		Locality (City/County & State)				
PHA Number: NE001		☒ Original 5-Year Plan ☐ Revised 5-Year Plan (Revision No:)				
A.	Development Number and Name	Work Statement for Year 1 2025	Work Statement for Year 2 2026	Work Statement for Year 3 2027	Work Statement for Year 4 2028	Work Statement for Year 5 2029
	HIGHLAND TOWER (NE001000012)	\$56,800.00	\$93,600.00	\$68,600.00	\$88,600.00	\$68,600.00
	FLORENCE TOWER (NE001000011)	\$94,200.00	\$101,000.00	\$81,000.00	\$101,000.00	\$81,000.00
	UNDERWOOD TOWER (NE001000014)	\$93,400.00	\$130,200.00	\$80,200.00	\$100,200.00	\$80,200.00
	CROWN II (NE001000026)	\$36,350.00	\$38,600.00	\$53,600.00	\$38,600.00	\$38,600.00
	KEYSTONE CROWN CREEK (NE001000022)	\$44,300.00	\$58,600.00	\$83,600.00	\$58,600.00	\$58,600.00
	FARNAM BUILDING (NE001000028)	\$37,300.00	\$1,541,600.00	\$66,600.00	\$61,600.00	\$241,600.00
	CROWN TOWER (NE001000015)	\$251,800.00	\$368,600.00	\$68,600.00	\$88,600.00	\$273,900.00
	SPENCER, ALAMO, LONG SCHOOL, SC SITES NE	\$94,300.00	\$116,875.00	\$143,600.00	\$93,600.00	\$93,600.00
	SCATTERED SITES SE (NE001000017)	\$76,700.00	\$99,275.00	\$126,000.00	\$76,000.00	\$76,000.00
	CHERRY TREE, SCATTERED SITES NW (NE001000018)	\$72,300.00	\$94,875.00	\$121,600.00	\$71,600.00	\$71,600.00

Capital Fund Program - Five-Year Action Plan

Status: Draft

Approval Date:

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Part I: Summary						
PHA Name : Omaha Housing Authority		Locality (City/County & State)				
PHA Number: NE001		☒ Original 5-Year Plan ☐ Revised 5-Year Plan (Revision No:)				
A.	Development Number and Name	Work Statement for Year 1 2025	Work Statement for Year 2 2026	Work Statement for Year 3 2027	Work Statement for Year 4 2028	Work Statement for Year 5 2029
	SCATTERED SITES SW (NE001000019)	\$64,300.00	\$86,875.00	\$113,600.00	\$63,600.00	\$63,600.00
	NORTH OMAHA AFFORDABLE HOMES (NE001000023)	\$48,300.00	\$38,600.00	\$63,600.00	\$38,600.00	\$38,600.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development
Office of Public and Indian Housing
2577-0274
02/28/2022

Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2025				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$2,785,000.00
ID0000797	Operations(Operations (1406))	Operations		\$1,875,000.00
ID0000798	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Administration - Management of the Capital Funds Grants and all projects funded by those Grants.		\$750,000.00
ID0000805	Management Improvements(Management Improvement (1408)-System Improvements,Management Improvement (1408)-Staff Training)	Training on new methods for operation efficiencies		\$60,000.00
ID0000806	A&E services(Contract Administration (1480)-Other)	A&E and similar consulting services, including for landscape and fire panel design.		\$100,000.00
	CROWN I (NE001000025)			\$36,350.00
ID0000808	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

Capital Fund Program - Five-Year Action Plan

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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2025				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)			
ID0000872	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001116	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001303	Site - equipment(Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Playground Areas - Equipment,Dwelling Unit-Site Work (1480)-Storm Drainage)	Upgrades and non-routine maintenance for paving, retaining walls, fencing, landscaping, and drainage, including outdoor play equipment.		\$12,050.00
	PARK VILLA (NE001000031)			\$19,300.00
ID0000824	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001031	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00

Capital Fund Program - Five-Year Action Plan

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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2025				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)			
	BAYVIEW APARTMENTS (NE001000027)			\$21,800.00
ID0000825	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001021	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001285	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$2,500.00
	JACKSON TOWER (NE001000013)			\$214,600.00

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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2025				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0000830	Common area - painting(Non-Dwelling Interior (1480)-Common Area Painting)	Paint hallways, lobby		\$2,500.00
ID0000888	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001076	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$82,800.00
ID0001201	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001265	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$25,000.00

Capital Fund Program - Five-Year Action Plan

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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2025				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001297	Building systems - elevator(Non-Dwelling Construction - Mechanical (1480)-Elevator)	Elevator system upgrades and non-routine maintenance, especially upgrade connecting door equipment in both cars.		\$35,000.00
ID0001309	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$50,000.00
	KAY JAY TOWER (NE001000005)			\$2,953,600.00
ID0000842	Common Area - painting(Non-Dwelling Interior (1480)-Common Area Painting)	Repaint ceilings and walls		\$2,500.00
ID0001036	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$46,800.00
ID0001165	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

Capital Fund Program - Five-Year Action Plan

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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2025				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001221	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001230	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001293	Buliding Systems - plumbing(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Common Area Dryers,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Unit Sub-panels,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Replacement of building systems and components with upgraded products in all non-dwelling areas - Replace plumbing stacks and related fixtures and equipment.		\$2,725,000.00
ID0001294	Relocation(Contract Administration (1480)-Relocation)	Tenant relocation in connection with plumbing stack replacement		\$120,000.00
ID0001296	Building systems - elevator(Non-Dwelling Construction - Mechanical (1480)-Elevator)	Elevator system upgrades and non-routine maintenance, especially upgrade connecting door equipment in both cars.		\$35,000.00

Capital Fund Program - Five-Year Action Plan

U.S. Department of Housing and Urban Development
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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 1 2025				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	EVANS TOWER (NE001000006)			\$95,800.00
ID0000848	Common Area - painting(Non-Dwelling Interior (1480)-Common Area Painting)	Repaint ceilings and walls		\$2,500.00
ID0001041	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$44,000.00
ID0001170	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001222	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001235	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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	Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)			
ID0001305	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$25,000.00
	PARK SOUTH (NE001000008)			\$237,700.00
ID0000850	Common Area - painting(Non-Dwelling Interior (1480)-Common Area Painting)	Repaint ceilings and walls		\$5,000.00
ID0001046	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$88,400.00
ID0001175	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001223	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001240	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001298	Building systems - elevator(Non-Dwelling Construction - Mechanical (1480)-Elevator)	Elevator system upgrades and non-routine maintenance, especially upgrade connecting door equipment in both cars.		\$70,000.00
ID0001306	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$50,000.00
	BENSON TOWER (NE001000009)			\$109,000.00
ID0000851	Common Area - painting(Non-Dwelling Interior (1480)-Common Area Painting)	Repaint ceilings and walls		\$2,500.00

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ID0001051	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$57,200.00
ID0001180	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001224	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001245	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001307	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$25,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	PINE TOWER (NE001000010)			\$56,800.00
ID0000852	Common Area - painting(Non-Dwelling Interior (1480)-Common Area Painting)	Repaint ceilings and walls		\$2,500.00
ID0001056	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$30,000.00
ID0001185	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001225	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001250	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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	Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)			
	HIGHLAND TOWER (NE001000012)			\$56,800.00
ID0000853	Common Area - painting(Non-Dwelling Interior (1480)-Common Area Painting)	Repaint ceilings and walls		\$2,500.00
ID0001066	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$30,000.00
ID0001195	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001227	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001260	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
	FLORENCE TOWER (NE001000011)			\$94,200.00
ID0000855	Common Area - painting(Non-Dwelling Interior (1480)-Common Area Painting)	Repaint ceilings and walls		\$2,500.00
ID0001061	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodos,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$42,400.00
ID0001190	Exterior - renovations(Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001226	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001255	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001308	Units - modernization(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$25,000.00
	UNDERWOOD TOWER (NE001000014)			\$93,400.00
ID0000856	Common Area - painting(Non-Dwelling Interior (1480)-Common Area Painting)	Repaint ceilings and walls		\$2,500.00
ID0001081	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$41,600.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)			
ID0001206	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001228	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001270	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001310	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodos,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$25,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	CROWN II (NE001000026)			\$36,350.00
ID0000873	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001121	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001130	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001304	Site - equipment(Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Playground Areas - Equipment,Dwelling Unit-Site Work (1480)-Storm Drainage)	Upgrades and non-routine maintenance for paving, retaining walls, fencing, landscaping, and drainage, including outdoor play equipment.		\$12,050.00
	KEYSTONE CROWN CREEK (NE001000022)			\$44,300.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0000874	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001106	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$10,000.00
ID0001139	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
	FARNAM BUILDING (NE001000028)			\$37,300.00
ID0000904	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001026	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$8,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001280	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001311	Site - paving(Non-Dwelling Site Work (1480)-Asphalt - Concrete - Paving)	Repairs to paving on south side of building, including driveway, loading dock, and sidewalk.		\$10,000.00
	CROWN TOWER (NE001000015)			\$251,800.00
ID0001071	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodos,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$30,000.00
ID0001211	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

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Work Statement for Year 1 2025				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001145	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001220	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001299	Site - improvement(Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Playground Areas - Equipment,Dwelling Unit-Site Work (1480)-Storm Drainage)	Upgrades and non-routine maintenance for paving, retaining walls, fencing, landscaping, and drainage		\$15,000.00
	SCATTERED SITES SE (NE001000017)			\$76,700.00
ID0001091	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodos,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$27,400.00
ID0001150	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)			
ID0001219	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001300	Site - improvement(Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Playground Areas - Equipment,Dwelling Unit-Site Work (1480)-Storm Drainage)	Upgrades and non-routine maintenance for paving, retaining walls, fencing, landscaping, and drainage		\$15,000.00
	CHERRY TREE, SCATTERED SITES NW (NE001000018)			\$72,300.00
ID0001096	Units - interior renovations(Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodos,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$23,000.00
ID0001155	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00

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ID0001218	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001301	Site - improvement(Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Playground Areas - Equipment,Dwelling Unit-Site Work (1480)-Storm Drainage)	Upgrades and non-routine maintenance for paving, retaining walls, fencing, landscaping, and drainage		\$15,000.00
	SCATTERED SITES SW (NE001000019)			\$64,300.00
ID0001101	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodos,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$15,000.00
ID0001160	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001217	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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ID0001302	Site - improvement(Dwelling Unit-Site Work (1480)-Asphalt - Concrete - Paving,Dwelling Unit-Site Work (1480)-Curb and Gutter,Dwelling Unit-Site Work (1480)-Fencing,Dwelling Unit-Site Work (1480)-Landscape,Dwelling Unit-Site Work (1480)-Other,Dwelling Unit-Site Work (1480)-Parking,Dwelling Unit-Site Work (1480)-Pedestrian paving,Dwelling Unit-Site Work (1480)-Playground Areas - Equipment,Dwelling Unit-Site Work (1480)-Storm Drainage)	Upgrades and non-routine maintenance for paving, retaining walls, fencing, landscaping, and drainage		\$15,000.00
	NORTH OMAHA AFFORDABLE HOMES (NE001000023)			\$48,300.00
ID0001111	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical))	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001140	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001216	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001312	Units - appliances(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing)	Install washer and dryer in each NOAH unit		\$24,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$2,730,000.00
ID0000857	Management Improvements(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	Training on new methods for operation efficiencies		\$5,000.00
ID0000858	Operations(Operations (1406))	Operations		\$1,875,000.00
ID0000859	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Administration - Management of the Capital Funds Grants and all projects funded by those Grants.		\$750,000.00
ID0001017	A&E services(Contract Administration (1480)-Other)	A&E and similar consulting services		\$100,000.00
	BAYVIEW APARTMENTS (NE001000027)			\$36,100.00
ID0001022	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001286	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$2,500.00
ID0001459	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001463	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
	FARNAM BUILDING (NE001000028)			\$1,541,600.00
ID0001027	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$8,000.00
ID0001281	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001475	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001479	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	KAY JAY TOWER (NE001000005)			\$1,117,600.00
ID0001037	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$46,800.00
ID0001166	Exterior - renovations(Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001231	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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ID0001042	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$44,000.00
ID0001171	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001236	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001322	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001326	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001488	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$25,000.00
	PARK SOUTH (NE001000008)			\$147,000.00
ID0001047	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$88,400.00
ID0001176	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001241	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001330	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001334	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001489	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$20,000.00
	BENSON TOWER (NE001000009)			\$120,800.00
ID0001052	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$57,200.00
ID0001181	Exterior - renovations(Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001246	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001338	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001342	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001490	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$25,000.00
	PINE TOWER (NE001000010)			\$108,600.00
ID0001057	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$30,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)			
ID0001186	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001251	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001346	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001350	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00

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ID0001494	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$40,000.00
	FLORENCE TOWER (NE001000011)			\$101,000.00
ID0001062	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$42,400.00
ID0001191	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001256	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001354	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001358	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001491	Units - modernization(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$20,000.00
	HIGHLAND TOWER (NE001000012)			\$93,600.00
ID0001067	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$30,000.00
ID0001197	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

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Work Statement for Year 2 2026				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001261	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001362	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001366	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001495	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Plumbing)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$25,000.00
	CROWN TOWER (NE001000015)			\$368,600.00
ID0001072	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$30,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)			
ID0001212	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001276	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001386	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001390	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001496	Units - modernization(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware, especially in connection with WATER DAMAGE AND MICROBIAL GROWTH repairs.		\$150,000.00
ID0001503	Common area - renovation(Non-Dwelling Interior (1480)-Common Area Bathrooms,Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Common Area Flooring,Non-Dwelling Interior (1480)-Common Area Kitchens,Non-Dwelling Interior (1480)-Common Area Painting,Non-Dwelling Interior (1480)-Doors,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Other,Non-Dwelling Interior (1480)-Storage Area)	Renovate lobby and common area finishes		\$150,000.00
	JACKSON TOWER (NE001000013)			\$291,400.00
ID0001077	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$82,800.00
ID0001202	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001266	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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	Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)			
ID0001370	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001374	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001502	Common area - renovation(Non-Dwelling Interior (1480)-Common Area Bathrooms,Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Common Area Flooring,Non-Dwelling Interior (1480)-Common Area Kitchens,Non-Dwelling Interior (1480)-Common Area Painting,Non-Dwelling Interior (1480)-Doors,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Other,Non-Dwelling Interior (1480)-Storage Area)	Renovate lobby and common area finishes		\$150,000.00
ID0001504	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$20,000.00
	UNDERWOOD TOWER (NE001000014)			\$130,200.00

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ID0001082	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$41,600.00
ID0001207	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001271	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001378	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001382	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00

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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 2 2026				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001492	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$50,000.00
	SPENCER, ALAMO, LONG SCHOOL, SC SITES NE (NE001000016)			\$116,875.00
ID0001087	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$45,000.00
ID0001146	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001394	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001398	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001497	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$23,275.00
	CHERRY TREE, SCATTERED SITES NW (NE001000018)			\$94,875.00
ID0001097	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$23,000.00
ID0001156	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001411	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001415	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001505	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$23,275.00
	SCATTERED SITES SW (NE001000019)			\$86,875.00
ID0001102	Units - interior renovations(Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$15,000.00
ID0001161	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001419	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001423	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00

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Work Statement for Year 2 2026				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001507	Units - modernization(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$23,275.00
	KEYSTONE CROWN CREEK (NE001000022)			\$58,600.00
ID0001107	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$10,000.00
ID0001135	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001427	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001431	Relocation(RAD Funds Pre Closing (1480),Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00

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Work Statement for Year 2 2026				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	NORTH OMAHA AFFORDABLE HOMES (NE001000023)			\$38,600.00
ID0001112	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001141	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports - Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001435	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
ID0001436	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
	CROWN I (NE001000025)			\$38,600.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001117	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001126	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001443	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001447	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
	CROWN II (NE001000026)			\$38,600.00
ID0001122	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00

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Work Statement for Year 2 2026				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001131	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001451	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001455	Relocation(RAD Funds Pre Closing (1480),Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	SCATTERED SITES SE (NE001000017)			\$99,275.00
ID0001151	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001291	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$27,400.00

Form HUD-50075.2(4/2008)

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$2,670,300.00
ID0000887	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Administration - Management of the Capital Funds Grants and all projects funded by those Grants.		\$750,000.00
ID0000897	Management Improvements(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	Training		\$5,000.00
ID0000903	Operations(Operations (1406))	Operations		\$1,875,000.00
ID0001018	A&E services(Contract Administration (1480)-Other)	A&E and similar consulting services		\$40,300.00
	BAYVIEW APARTMENTS (NE001000027)			\$51,100.00
ID0001023	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001287	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$2,500.00
ID0001460	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001464	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
ID0001517	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$15,000.00
	FARNAM BUILDING (NE001000028)			\$66,600.00
ID0001028	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$8,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)			
ID0001282	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001468	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001472	Relocation(RAD Funds Pre Closing (1480),Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001518	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$25,000.00
	PARK VILLA (NE001000031)			\$33,600.00

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ID0001033	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001476	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001480	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	KAY JAY TOWER (NE001000005)			\$85,400.00
ID0001038	Units - interior renovations(Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$46,800.00
ID0001167	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc)			
ID0001237	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution,Non-Dwelling Construction - Mechanical (1480)-Central Boiler)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001323	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001327	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	PARK SOUTH (NE001000008)			\$3,027,000.00
ID0001048	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$88,400.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001177	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001242	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001331	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001335	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001484	Building Systems - plumbing(Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	NORTH TOWER - replace plumbing stacks and related equipment		\$2,750,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001486	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with plumbing stack replacement in North Tower		\$150,000.00
	BENSON TOWER (NE001000009)			\$95,800.00
ID0001053	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodos,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$57,200.00
ID0001182	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001247	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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ID0001339	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001343	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	PINE TOWER (NE001000010)			\$68,600.00
ID0001058	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$30,000.00
ID0001187	Exterior - renovations(Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001252	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security -	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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	Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)			
ID0001347	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001351	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	FLORENCE TOWER (NE001000011)			\$81,000.00
ID0001063	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$42,400.00
ID0001192	Exterior - renovations(Dwelling Unit-Exterior (1480)-Carports - Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

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ID0001257	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001355	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001359	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	HIGHLAND TOWER (NE001000012)			\$68,600.00
ID0001068	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$30,000.00
ID0001198	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters -	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

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	Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)			
ID0001262	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001363	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001367	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	CROWN TOWER (NE001000015)			\$68,600.00
ID0001073	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$30,000.00

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ID0001213	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001277	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001387	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001391	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	JACKSON TOWER (NE001000013)			\$261,400.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001508	Building Systems - fire safety(Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection)	replace fire alarm panel and related equipment		\$140,000.00
	UNDERWOOD TOWER (NE001000014)			\$80,200.00
ID0001083	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$41,600.00
ID0001208	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001272	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001379	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001383	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	SPENCER, ALAMO, LONG SCHOOL, SC SITES NE (NE001000016)			\$143,600.00
ID0001088	Units - interior renovations(Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodos,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$45,000.00
ID0001147	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001395	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001399	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001509	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$50,000.00
	SCATTERED SITES SE (NE001000017)			\$126,000.00
ID0001093	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$27,400.00
ID0001152	Exterior - renovations(Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001403	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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ID0001407	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001510	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$50,000.00
	CHERRY TREE, SCATTERED SITES NW (NE001000018)			\$121,600.00
ID0001098	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$23,000.00
ID0001157	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001412	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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ID0001416	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001511	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$50,000.00
	SCATTERED SITES SW (NE001000019)			\$113,600.00
ID0001103	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$15,000.00
ID0001162	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001420	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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ID0001424	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001512	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$50,000.00
	KEYSTONE CROWN CREEK (NE001000022)			\$83,600.00
ID0001108	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$10,000.00
ID0001136	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001428	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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ID0001432	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
ID0001513	Units - modernization(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$25,000.00
	NORTH OMAHA AFFORDABLE HOMES (NE001000023)			\$63,600.00
ID0001113	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001142	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001439	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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ID0001440	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
ID0001514	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$25,000.00
	CROWN I (NE001000025)			\$53,600.00
ID0001118	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001127	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001444	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001448	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
ID0001515	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$15,000.00
	CROWN II (NE001000026)			\$53,600.00
ID0001123	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001132	Exterior - renovations(Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001452	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$2,730,000.00
ID0000916	Operations(Operations (1406))	Operations		\$1,875,000.00
ID0000917	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Administration - Management of the Capital Funds Grants and all projects funded by those Grants.		\$750,000.00
ID0000921	Management Improvements(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	Training on new methods for operation efficiencies		\$5,000.00
ID0001019	A&E services(Contract Administration (1480)-Other)	A&E and similar consulting services		\$100,000.00
	BAYVIEW APARTMENTS (NE001000027)			\$36,100.00
ID0001024	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001288	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$2,500.00
ID0001461	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001465	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
	FARNAM BUILDING (NE001000028)			\$61,600.00
ID0001029	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$8,000.00
ID0001283	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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	Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)			
ID0001469	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001473	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
ID0001532	Common Area - lighting(Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Other)	Replace / upgrade common area lighting, including emergency and exit lighting.		\$20,000.00
	PARK VILLA (NE001000031)			\$53,600.00
ID0001034	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001477	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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ID0001481	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001533	Units - modernization(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Other,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers)	Full or partial unit modernization including kitchen, bath, flooring, lighting, appliances, paint, interior doors, and hardware.		\$20,000.00
	KAY JAY TOWER (NE001000005)			\$105,400.00
ID0001039	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$46,800.00
ID0001168	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001233	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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ID0001315	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001320	Relocation(Contract Administration (1480)-Relocation)	In connection with RAD activity		\$14,300.00
ID0001522	Common Area - lighting(Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Other)	Replace / upgrade common area lighting, including emergency and exit lighting.		\$20,000.00
	EVANS TOWER (NE001000006)			\$102,600.00
ID0001044	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodos,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$44,000.00
ID0001173	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters -	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

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	Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)			
ID0001238	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001324	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001328	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001523	Common Area - lighting(Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Other)	Replace / upgrade common area lighting, including emergency and exit lighting.		\$20,000.00
	PARK SOUTH (NE001000008)			\$3,207,300.00

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ID0001049	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$88,400.00
ID0001178	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001243	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001332	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001336	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00

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ID0001519	Building Systems - plumbing(Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	NORTH TOWER - replace plumbing stacks and related equipment		\$2,750,000.00
ID0001520	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with plumbing stack replacement in South Tower		\$150,000.00
ID0001524	Common Area - lighting(Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Other)	Replace / upgrade common area lighting, including emergency and exit lighting.		\$40,000.00
ID0001534	Building Systems - HVAC(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other)	Boiler/HVAC replacement or major repairs		\$140,300.00
	BENSON TOWER (NE001000009)			\$115,800.00
ID0001054	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodos,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$57,200.00
ID0001183	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters -	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

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	Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)			
ID0001248	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001340	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001344	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001525	Common Area - lighting(Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Other)	Replace / upgrade common area lighting, including emergency and exit lighting.		\$20,000.00
	PINE TOWER (NE001000010)			\$88,600.00

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ID0001059	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$30,000.00
ID0001188	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001253	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001348	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001352	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00

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ID0001527	Common Area - lighting(Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Other)	Replace / upgrade common area lighting, including emergency and exit lighting.		\$20,000.00
	FLORENCE TOWER (NE001000011)			\$101,000.00
ID0001064	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$42,400.00
ID0001193	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001258	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001356	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001360	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001528	Common Area - lighting(Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Other)	Replace / upgrade common area lighting, including emergency and exit lighting.		\$20,000.00
	HIGHLAND TOWER (NE001000012)			\$88,600.00
ID0001069	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$30,000.00
ID0001199	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

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ID0001263	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001364	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001368	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001529	Common Area - lighting(Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Other)	Replace / upgrade common area lighting, including emergency and exit lighting.		\$20,000.00
	CROWN TOWER (NE001000015)			\$88,600.00
ID0001074	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$30,000.00

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ID0001214	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001278	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001388	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001392	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001526	Common Area - lighting(Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Other)	Replace / upgrade common area lighting, including emergency and exit lighting.		\$20,000.00

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	JACKSON TOWER (NE001000013)			\$141,400.00
ID0001079	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$82,800.00
ID0001204	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports - Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001268	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001372	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001376	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001530	Common Area - lighting(Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Other)	Replace / upgrade common area lighting, including emergency and exit lighting.		\$20,000.00
	UNDERWOOD TOWER (NE001000014)			\$100,200.00
ID0001084	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodities,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$41,600.00
ID0001209	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001273	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)			
ID0001380	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001384	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001531	Common Area - lighting(Non-Dwelling Interior (1480)-Common Area Finishes,Non-Dwelling Interior (1480)-Electrical,Non-Dwelling Interior (1480)-Other)	Replace / upgrade common area lighting, including emergency and exit lighting.		\$20,000.00
	SPENCER, ALAMO, LONG SCHOOL, SC SITES NE (NE001000016)			\$93,600.00
ID0001089	Units - interior renovations(Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Plumbing)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$45,000.00
ID0001148	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters -	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)			
ID0001396	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001400	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	SCATTERED SITES SE (NE001000017)			\$76,000.00
ID0001094	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$27,400.00
ID0001153	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001404	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001408	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	CHERRY TREE, SCATTERED SITES NW (NE001000018)			\$71,600.00
ID0001099	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Appliances)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$23,000.00
ID0001158	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001413	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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ID0001417	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	SCATTERED SITES SW (NE001000019)			\$63,600.00
ID0001104	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$15,000.00
ID0001163	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters -Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001421	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001425	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	KEYSTONE CROWN CREEK (NE001000022)			\$58,600.00
ID0001109	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$10,000.00
ID0001137	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports - Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001429	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001433	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
	NORTH OMAHA AFFORDABLE HOMES (NE001000023)			\$38,600.00

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ID0001114	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001143	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001437	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001441	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
	CROWN I (NE001000025)			\$38,600.00
ID0001119	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001128	Exterior - renovations(Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001445	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001449	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
	CROWN II (NE001000026)			\$38,600.00
ID0001124	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodores,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001133	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	AUTHORITY-WIDE (NAWASD)			\$2,875,000.00
ID0000937	Operations(Operations (1406))	Operations		\$1,875,000.00
ID0000938	Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	Administration		\$750,000.00
ID0000939	Management Improvements(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	Training		\$100,000.00
ID0001020	A&E services(Contract Administration (1480)-Other)	A&E and similar consulting services		\$150,000.00
	BAYVIEW APARTMENTS (NE001000027)			\$36,100.00
ID0001025	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001289	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$2,500.00
ID0001462	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001466	Relocation(RAD Funds Pre Closing (1480),Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	FARNAM BUILDING (NE001000028)			\$241,600.00
ID0001030	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$8,000.00
ID0001284	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)			
ID0001470	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001474	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
ID0001535	Exterior - roof(Non-Dwelling Exterior (1480)-Gutters - Downspouts,Non-Dwelling Exterior (1480)-Paint and Caulking,Non-Dwelling Exterior (1480)-Roofs)	Replace roof		\$200,000.00
	PARK VILLA (NE001000031)			\$33,600.00
ID0001035	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001478	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001482	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	KAY JAY TOWER (NE001000005)			\$85,400.00
ID0001040	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$46,800.00
ID0001169	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001234	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001316	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001321	Relocation(Contract Administration (1480)-Relocation)	In connection with RAD activity		\$14,300.00
	EVANS TOWER (NE001000006)			\$82,600.00
ID0001045	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$44,000.00
ID0001174	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001239	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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	Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)			
ID0001325	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001329	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	PARK SOUTH (NE001000008)			\$127,000.00
ID0001050	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$88,400.00
ID0001179	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

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ID0001244	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution,Non-Dwelling Construction - Mechanical (1480)-Central Boiler)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001333	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001337	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	BENSON TOWER (NE001000009)			\$2,845,800.00
ID0001055	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$57,200.00
ID0001184	Exterior - renovations(Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations)			
ID0001249	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001341	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001345	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001521	Building Systems - plumbing(Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Replace plumbing stacks and related equipment		\$2,750,000.00
	PINE TOWER (NE001000010)			\$68,600.00

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	FLORENCE TOWER (NE001000011)			\$81,000.00
ID0001065	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$42,400.00
ID0001194	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001259	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001357	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001361	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	HIGHLAND TOWER (NE001000012)			\$68,600.00
ID0001070	Units - interior renovations(Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Appliances)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$30,000.00
ID0001200	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001264	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001365	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001369	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	CROWN TOWER (NE001000015)			\$273,900.00
ID0001075	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks)	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$30,000.00
ID0001215	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001279	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)			
ID0001389	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001393	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
ID0001536	Exterior- roofing(Non-Dwelling Exterior (1480)-Gutters - Downspouts,Non-Dwelling Exterior (1480)-Other,Non-Dwelling Exterior (1480)-Paint and Caulking,Non-Dwelling Exterior (1480)-Roofs)	Replace roof		\$205,300.00
	JACKSON TOWER (NE001000013)			\$121,400.00
ID0001080	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodos,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$82,800.00
ID0001205	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters -	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)			
ID0001269	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Boiler,Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001373	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001377	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	UNDERWOOD TOWER (NE001000014)			\$80,200.00
ID0001085	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$41,600.00

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Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001210	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001274	Building Systems - improvement(Non-Dwelling Construction - Mechanical (1480)-Central Chiller,Non-Dwelling Construction - Mechanical (1480)-Cooling Equipment - Systems,Non-Dwelling Construction - Mechanical (1480)-Electric Distribution,Non-Dwelling Construction - Mechanical (1480)-Elevator,Non-Dwelling Construction - Mechanical (1480)-Fire Suppression System,Non-Dwelling Construction - Mechanical (1480)-Generator,Non-Dwelling Construction - Mechanical (1480)-Heating Equipment - System,Non-Dwelling Construction - Mechanical (1480)-Hot Water Heaters,Non-Dwelling Construction - Mechanical (1480)-Other,Non-Dwelling Construction - Mechanical (1480)-Security - Fire Alarm,Non-Dwelling Construction - Mechanical (1480)-Smoke/Fire Detection,Non-Dwelling Construction - Mechanical (1480)-Trash Compactor,Non-Dwelling Construction - Mechanical (1480)-Water Distribution,Non-Dwelling Construction - Mechanical (1480)-Central Boiler)	Non-routine repairs and upgrades to building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.		\$5,000.00
ID0001381	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001385	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	SPENCER, ALAMO, LONG SCHOOL, SC SITES NE (NE001000016)			\$93,600.00

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ID0001090	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$45,000.00
ID0001149	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001397	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001401	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	SCATTERED SITES SE (NE001000017)			\$76,000.00
ID0001095	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and Showers,Dwelling Unit-Interior (1480)-Interior	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$27,400.00

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ID0001154	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001405	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001409	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	CHERRY TREE, SCATTERED SITES NW (NE001000018)			\$71,600.00
ID0001100	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodos,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$23,000.00
ID0001159	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00

Capital Fund Program - Five-Year Action Plan

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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 5 2029				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)			
ID0001414	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001418	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	SCATTERED SITES SW (NE001000019)			\$63,600.00
ID0001105	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$15,000.00
ID0001164	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00

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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 5 2029				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001422	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001426	Relocation(Contract Administration (1480)-Relocation)	Relocation in connection with RAD activity		\$14,300.00
	KEYSTONE CROWN CREEK (NE001000022)			\$58,600.00
ID0001110	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$10,000.00
ID0001138	Exterior - renovations(Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$20,000.00
ID0001430	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00

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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 5 2029				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001434	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
	NORTH OMAHA AFFORDABLE HOMES (NE001000023)			\$38,600.00
ID0001115	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001144	Exterior - renovations(Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001438	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001442	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00

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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 5 2029				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
	CROWN I (NE001000025)			\$38,600.00
ID0001120	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001129	Exterior - renovations(Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Carports - Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001446	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001450	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
	CROWN II (NE001000026)			\$38,600.00

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Part II: Supporting Pages - Physical Needs Work Statements (s)				
Work Statement for Year 5 2029				
Identifier	Development Number/Name	General Description of Major Work Categories	Quantity	Estimated Cost
ID0001125	Units - interior renovations(Dwelling Unit-Interior (1480)-Appliances,Dwelling Unit-Interior (1480)-Bathroom Counters and Sinks,Dwelling Unit-Interior (1480)-Bathroom Flooring (non cyclical),Dwelling Unit-Interior (1480)-Commodes,Dwelling Unit-Interior (1480)-Electrical,Dwelling Unit-Interior (1480)-Flooring (non routine),Dwelling Unit-Interior (1480)-Interior Doors,Dwelling Unit-Interior (1480)-Interior Painting (non routine),Dwelling Unit-Interior (1480)-Kitchen Cabinets,Dwelling Unit-Interior (1480)-Kitchen Sinks and Faucets,Dwelling Unit-Interior (1480)-Mechanical,Dwelling Unit-Interior (1480)-Plumbing,Dwelling Unit-Interior (1480)-Tubs and	Unit interior repair and upgrade activities including paint, drywall, lighting, plumbing fixtures, cabinets, countertops, flooring, HVAC, electrical, fire safety, doors, windows, appliances, and hardware.		\$5,000.00
ID0001134	Exterior - renovations(Dwelling Unit-Exterior (1480)-Carports -Surface Garage,Dwelling Unit-Exterior (1480)-Columns and Porches,Dwelling Unit-Exterior (1480)-Decks and Patios,Dwelling Unit-Exterior (1480)-Exterior Doors,Dwelling Unit-Exterior (1480)-Exterior Lighting,Dwelling Unit-Exterior (1480)-Exterior Paint and Caulking,Dwelling Unit-Exterior (1480)-Foundations,Dwelling Unit-Exterior (1480)-Gutters - Downspouts,Dwelling Unit-Exterior (1480)-Landings and Railings,Dwelling Unit-Exterior (1480)-Roofs,Dwelling Unit-Exterior (1480)-Siding,Dwelling Unit-Exterior (1480)-Soffits,Dwelling Unit-Exterior (1480)-Balconies-Porches-Railings-etc,Dwelling Unit-Exterior (1480)-Building Slab,Dwelling Unit-Exterior (1480)-Canopies,Dwelling Unit-Exterior (1480)-Tuck-Pointing,Dwelling Unit-Exterior (1480)-Windows)	Exterior repairs and improvements including roofing, siding, windows, doors, painting, carpentry, decks, porches, steps, railings, foundations, gutters, masonry, waterproofing, and lighting		\$5,000.00
ID0001454	RAD Funds Pre Closing(RAD Funds Pre Closing (1480))	RAD Funds Pre Closing		\$14,300.00
ID0001458	Relocation(Contract Administration (1480)-Relocation,RAD Funds Pre Closing (1480))	Relocation in connection with RAD activity		\$14,300.00
	Subtotal of Estimated Cost			\$7,500,000.00

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Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year 1 2025	
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Operations(Operations (1406))	\$1,875,000.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	\$750,000.00
Management Improvements(Management Improvement (1408)-System Improvements,Management Improvement (1408)-Staff Training)	\$60,000.00
A&E services(Contract Administration (1480)-Other)	\$100,000.00
Subtotal of Estimated Cost	\$2,785,000.00

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Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year	2026
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Management Improvements(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	\$5,000.00
Operations(Operations (1406))	\$1,875,000.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	\$750,000.00
A&E services(Contract Administration (1480)-Other)	\$100,000.00
Subtotal of Estimated Cost	\$2,730,000.00

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Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year	3 2027
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	\$750,000.00
Management Improvements(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	\$5,000.00
Operations(Operations (1406))	\$1,875,000.00
A&E services(Contract Administration (1480)-Other)	\$40,300.00
Subtotal of Estimated Cost	\$2,670,300.00

Form HUD-50075.2(4/2008)

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Part III: Supporting Pages - Management Needs Work Statements (s)	
Work Statement for Year	5 2029
Development Number/Name General Description of Major Work Categories	Estimated Cost
Housing Authority Wide	
Operations(Operations (1406))	\$1,875,000.00
Administration(Administration (1410)-Other,Administration (1410)-Salaries,Administration (1410)-Sundry)	\$750,000.00
Management Improvements(Management Improvement (1408)-Staff Training,Management Improvement (1408)-System Improvements)	\$100,000.00
A&E services(Contract Administration (1480)-Other)	\$150,000.00
Subtotal of Estimated Cost	\$2,875,000.00

Memorandum



To: OHA Board of Commissioners

From: Charles Karl, Capital Improvements Manager

Date: December 19th, 2024

Re: 2025-2029 Capital Fund Program 5-Year Action Plan

RECOMMENDED ACTION:

The Housing Authority of the City of Omaha (hereinafter "OHA") staff recommends the OHA Board of Commissioners approve the attached Capital Fund Program 5-Year Action Plan for 2025-2029.

EXPLANATION:

OHA's 2025-2029 5-Year Action Plan reflects current organizational priorities funded and managed under the Capital Improvements Program. This plan was presented to OHA's Central Advisory Council for feedback on 11/07/2024. OHA held a public hearing 11/25/2024, advertised 45 days in advance, to solicit feedback on the proposed plan from members of the public. Neither event produced significant feedback to incorporate into the plan.

PROJECT COST: (Estimated) \$37,500,000

SOURCE OF FUNDS: Capital Fund Program

SPONSOR(S): Charles Karl, Capital Improvements Manager
Michael Wehling, Senior Director of Housing Operations

RECOMMENDED BY: Joanie Poore, CEO

RESOLUTION NO. 2024 – 124
CFP FIVE-YEAR ACTION PLAN FOR 2025-2029

WHEREAS, the Housing Authority of the City of Omaha (OHA) prepares a CFP Five-Year Action Plan which describes the proposed capital improvements and other activities that OHA plans to undertake with Capital Fund Program funding;

WHEREAS, OHA is required to submit its CFP Five-Year Action Plan to HUD each year for approval;

WHEREAS, OHA staff held a meeting with the Central Advisory Committee to consult with resident leaders regarding OHA's CFP Five-Year Action Plan;

WHEREAS, OHA held a public hearing regarding the OHA's CFP Five-Year Action Plan; and

WHEREAS, OHA staff recommends that the OHA Board of Commissioners approve the CFP Five Year Action Plan for 2025 to 2029;

NOW, THEREFORE, BE IT RESOLVED THAT the Board of Commissioners of the Housing Authority of the City of Omaha hereby approves the CFP Five-Year Action Plan for 2025-2029.

David Levy, Chairman
OHA Board of Commissioners

ATTEST

I, Joanie Balk, Secretary of the Housing Authority of the City of Omaha, do hereby certify that this resolution was properly adopted at the meeting of the Board of Commissioners of the Housing Authority of the City of Omaha held December 19, 2024.

Joanie Balk, Secretary
Housing Authority of the City of Omaha



Omaha Housing Authority

2025–2029 Capital Improvement Five-Year Action Plan

Capital Funds Program Overview

Purpose of Capital Funds:

- Modernization
- Non-routine maintenance
- Vacancy reduction
- Energy efficiency
- Safety and Security
- Management improvements (e.g. training, systems)
- Development (RAD, financing, relocation, etc.)

Capital Funds Program Overview

- This is a five-year rolling plan; every year, a new plan is created – for the next five-year period
- This means that the first year of the plan matters the most, because subsequent years will be revised in the 2026 plan
- Years shown refer to the *grant* year, not necessarily when the work will be completed
- OHA has up to four years to spend the money from a given grant
- The plan must be approved by HUD and the OHA Board
- There are more projects planned than are shown here; they are being paid for with previous grants (e.g. 2023, 2024)

Non-Project Expenses

The following administrative, overhead, and development costs are – funded through each annual grant:

- Operations (up to 25%)
- Administration (up to 10%)
- Management Improvements (up to 10%)
- Development activity (RAD, relocation, etc.)

Project Expenses

After non-project expenses are deducted, the balance of the grant is allocated to capital projects that improve OHA's public housing properties.

- Unit upgrades / modernization (flooring, bathrooms, kitchens)
- Exterior repairs (windows, siding, roofing)
- Common areas (lobbies, hallways, lighting)
- Building systems (electrical, plumbing, fire safety, etc.)
- Project planning and design services (architectural, inspections)

Breakdown: Project vs. Non-Project

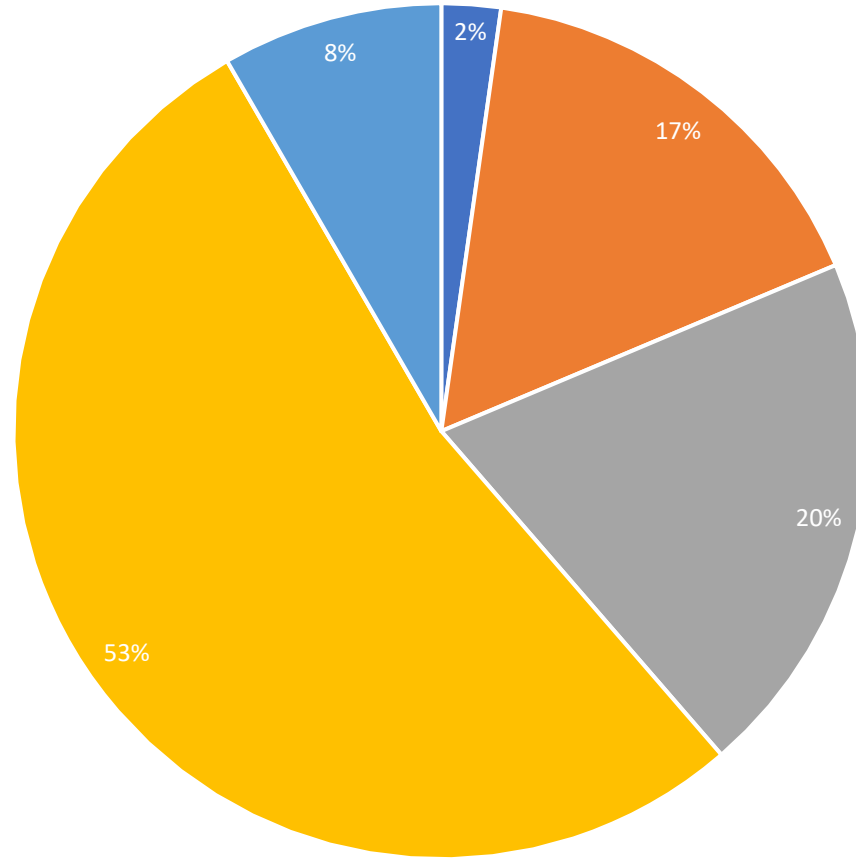
(Assumes an estimated annual award amount of \$7,500,000)

Item	2025	2026	2027	2028	2029	Total
Estimated Grant Total	\$7,500,000	\$7,500,000	\$7,500,000	\$7,500,000	\$7,500,000	\$37,500,000
<i>Operations (25%)</i>	<i>\$1,875,000</i>	<i>\$1,875,000</i>	<i>\$1,875,000</i>	<i>\$1,875,000</i>	<i>\$1,875,000</i>	<i>\$9,375,000</i>
<i>Administration (10%)</i>	<i>\$750,000</i>	<i>\$750,000</i>	<i>\$750,000</i>	<i>\$750,000</i>	<i>\$750,000</i>	<i>\$3,750,000</i>
<i>Management Improvements</i>	<i>\$60,000</i>	<i>\$5,000</i>	<i>\$5,000</i>	<i>\$5,000</i>	<i>\$100,000</i>	<i>\$175,000</i>
<i>Development</i>	<i>\$300,300</i>	<i>\$600,600</i>	<i>\$600,600</i>	<i>\$600,600</i>	<i>\$600,600</i>	<i>\$2,702,700</i>
Non-Project Expenses	\$2,985,300	\$3,230,600	\$3,230,600	\$3,230,600	\$3,325,600	\$16,002,700
Project Expenses	\$4,514,700	\$4,269,400	\$4,269,400	\$4,269,400	\$4,174,400	\$21,497,300

2025-2029 Projects (Combined)

Project Category	Details	Amount
Non-project	Non-project expenses (operations, admin, RAD, training, software)	\$16,002,700
A&E	Architectural and engineering services	\$480,300
Exterior repairs	General exterior repairs across public housing including roofing, gutters, siding, masonry, windows, doors, painting, decks, paving, retaining walls, and landscaping.	\$3,529,400
Unit upgrades	Unit repairs and modernization including flooring, cabinets, countertops, lighting, bathrooms, appliances, etc.	\$4,297,300
Plumbing upgrades	Tower plumbing stack replacement	\$11,395,000
Tower common area & system upgrades	Tower building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, elevators, and common area cosmetic work	\$1,795,300

2025-2029 Projects (Combined)



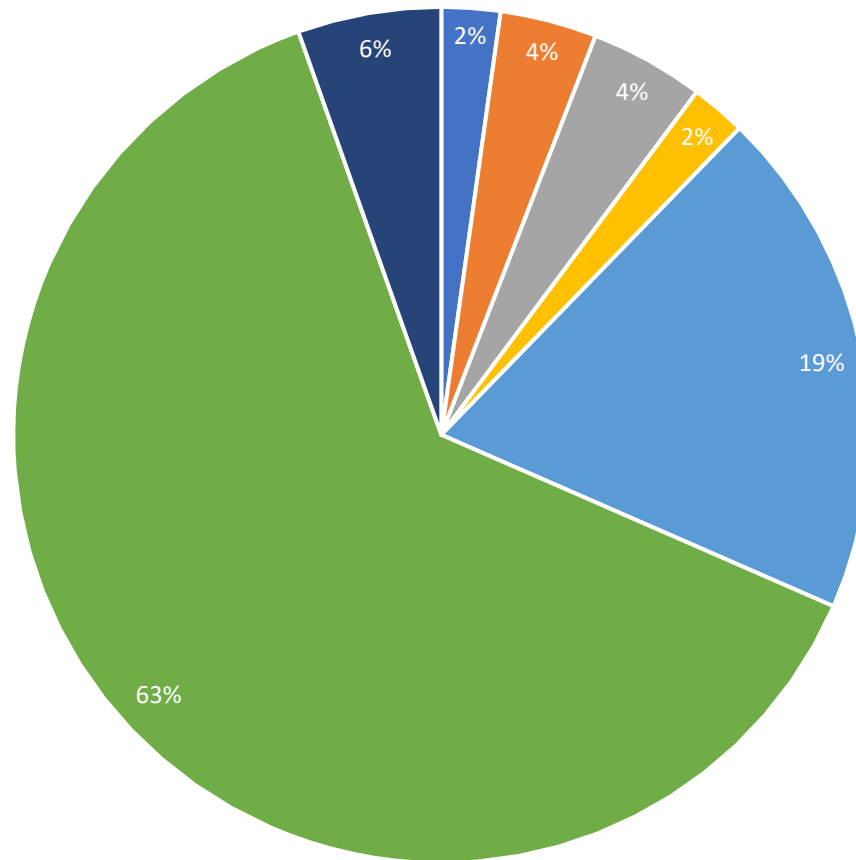
■ A&E ■ Exterior repairs ■ Unit upgrades ■ Plumbing upgrades ■ Tower common area & system upgrades

Questions / Comments?

2025 Projects

Project Category	Details	Amount
Non-project	Non-project expenses (operations, admin, RAD, training, software)	\$2,985,300
A&E	architectural and engineering services	\$100,000
Exterior repairs	General exterior repairs across public housing including roofing, gutters, siding, masonry, windows, doors, painting, decks, gutters, and lighting.	\$165,000
Crown Tower exterior	Crown Tower exterior waterproofing and masonry repairs	\$195,000
Site improvements	Non tower site improvements including retaining walls, paving, landscaping, etc.	\$94,100
Unit upgrades	Unit repairs and modernization including flooring, cabinets, countertops, lighting, bathrooms, appliances, etc.	\$870,600
Kay Jay plumbing	Replace plumbing stacks, including relocation	\$2,845,000
Tower common area & system upgrades	Tower building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, elevators, and common area cosmetic work.	\$245,000

2025 Projects

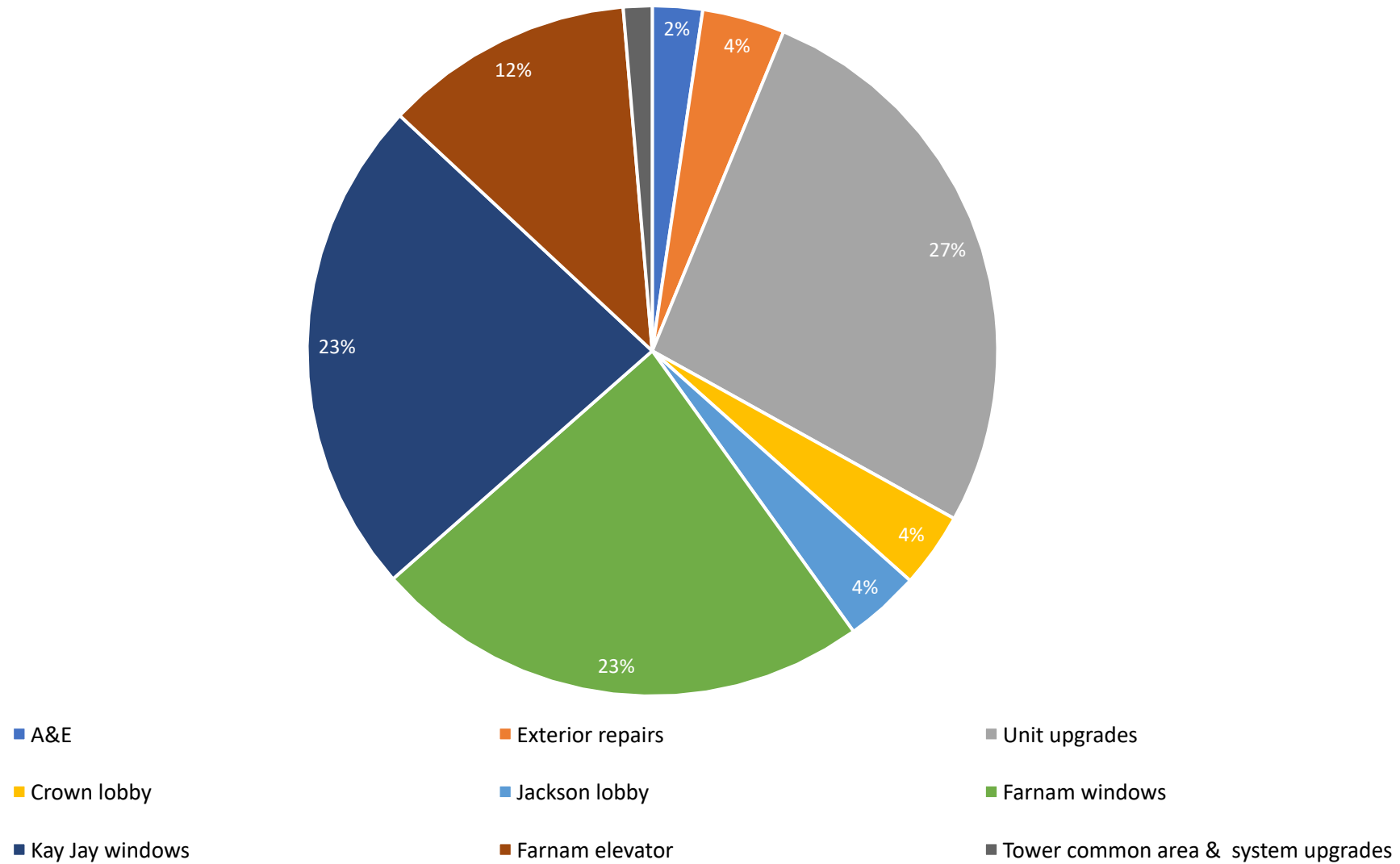


■ A&E ■ Exterior repairs ■ Crown Tower exterior ■ Site improvements ■ Unit upgrades ■ Kay Jay plumbing ■ Tower common area & system upgrades

2026 Projects

Project Category	Details	Amount
Non-project	Non-project expenses (operations, admin, RAD, training, software)	\$3,230,600
A&E	architectural and engineering services	\$100,000
Exterior repairs	General exterior repairs across public housing including roofing, gutters, siding, masonry, windows, doors, painting, decks, gutters, and lighting.	\$165,000
Unit upgrades	Unit repairs and modernization including flooring, cabinets, countertops, lighting, bathrooms, appliances, etc.	\$1,146,900
Crown lobby	Renovation of building lobby, including vestibules, flooring, mail and package areas, and flooring	\$150,000
Jackson lobby	Renovation of building lobby, including vestibules, flooring, mail and package areas, and flooring	\$150,000
Farnam windows	Replace all unit and common area windows at Farnam	\$1,000,000
Kay Jay windows	Replace all unit and common area windows at Kay Jay	\$1,000,000
Farnam elevator	Full modernization of one Farnam elevator car	\$500,000
Tower common area & system upgrades	Tower building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.	\$57,500

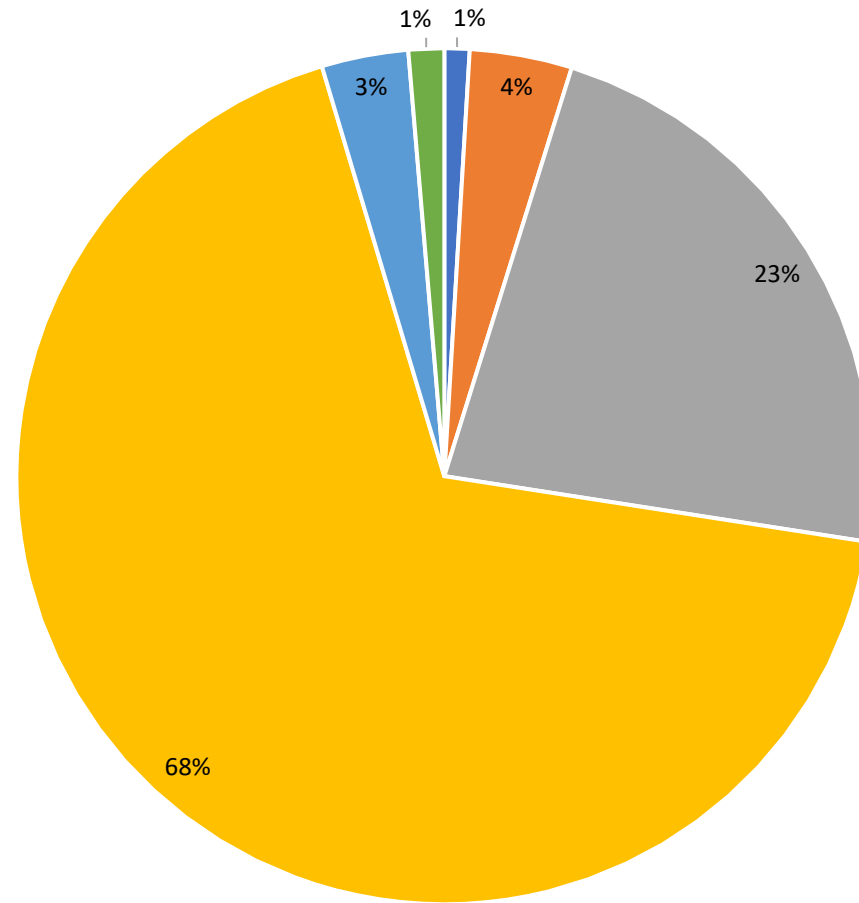
2026 Projects



2027 Projects

Project Category	Details	Amount
Non-project	Non-project expenses (operations, admin, RAD, training, software)	\$3,230,600
A&E	architectural and engineering services	\$40,300
Exterior repairs	General exterior repairs across public housing including roofing, gutters, siding, masonry, windows, doors, painting, decks, gutters, and lighting.	\$165,000
Unit upgrades	Unit repairs and modernization including flooring, cabinets, countertops, lighting, bathrooms, appliances, etc.	\$966,600
Park plumbing	Replace plumbing stacks, including relocation - North Tower	\$2,900,000
Jackson fire alarm	Replace fire alarm panel and related equipment	\$140,000
Tower common area & system upgrades	Tower building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.	\$57,500

2027 Projects

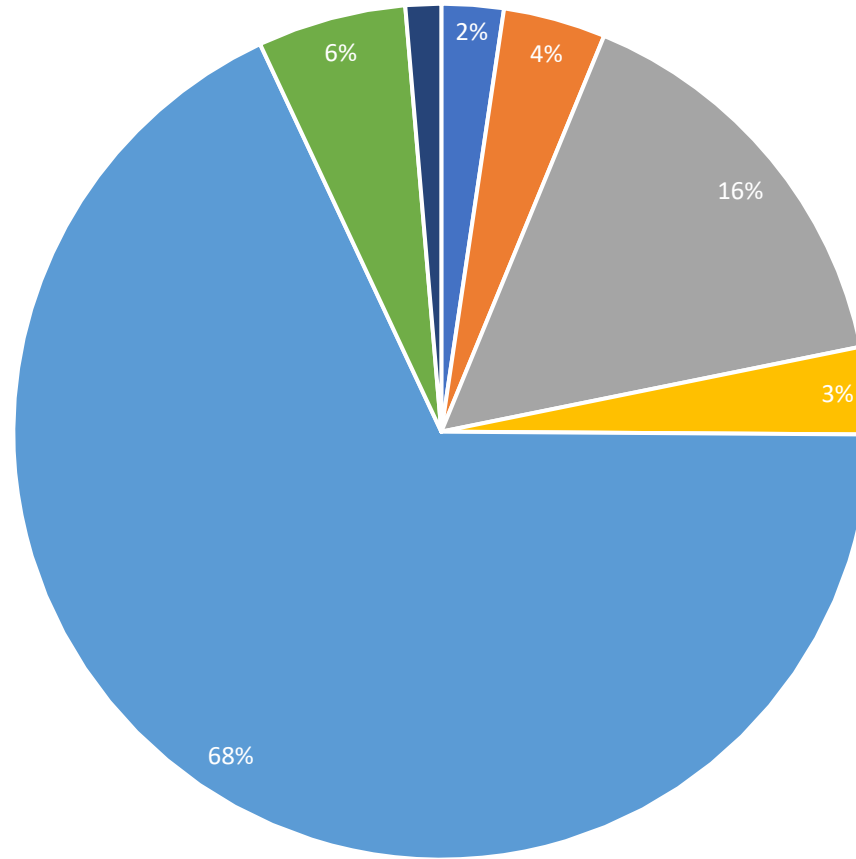


■ A&E ■ Exterior repairs ■ Unit upgrades ■ Park plumbing ■ Jackson fire alarm ■ Tower common area & system upgrades

2028 Projects

Project Category	Details	Amount
Non-project	Non-project expenses (operations, admin, RAD, training, software)	\$3,230,600
A&E	architectural and engineering services	\$100,000
Exterior repairs	General exterior repairs across public housing including roofing, gutters, siding, masonry, windows, doors, painting, decks, gutters, and lighting.	\$165,000
Unit upgrades	Unit repairs and modernization including flooring, cabinets, countertops, lighting, bathrooms, appliances, etc.	\$666,600
Park boiler	Major repairs and upgrades to Park boiler	\$140,300
Park plumbing	Replace plumbing stacks, including relocation - South Tower	\$2,900,000
Tower lighting	Replace common area lighting, including emergency lighting, at all towers	\$240,000
Tower common area & system upgrades	Tower building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.	\$57,500

2028 Projects

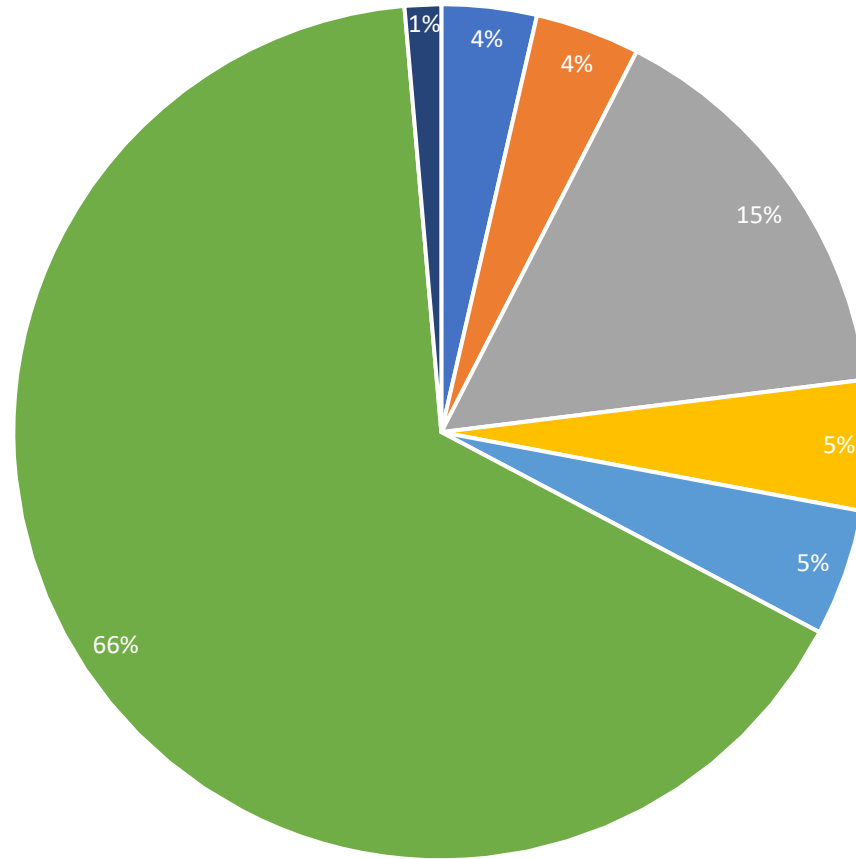


■ A&E ■ Exterior repairs ■ Unit upgrades ■ Park boiler ■ Park plumbing ■ Tower lighting ■ Tower common area & system upgrades

2029 Projects

Project Category	Details	Amount
Non-project	Non-project expenses (operations, admin, RAD, training, software)	\$3,325,600
A&E	architectural and engineering services	\$150,000
Exterior repairs	General exterior repairs across public housing including roofing, gutters, siding, masonry, windows, doors, painting, decks, gutters, and lighting.	\$165,000
Unit upgrades	Unit repairs and modernization including flooring, cabinets, countertops, lighting, bathrooms, appliances, etc.	\$646,600
Crown roof	Repair / replace building roof	\$205,300
Farnam roof	Repair / replace building roof	\$200,000
Benson plumbing	Replace plumbing stacks	\$2,750,000
Tower common area & system upgrades	Tower building systems, including fire safety and suppression, electrical, plumbing, waste disposal systems, central HVAC and boilers, and elevators.	\$57,500

2029 Projects



■ A&E ■ Exterior repairs ■ Unit upgrades ■ Crown roof ■ Farnam roof ■ Benson plumbing ■ Tower common area & system upgrades

7. DEPARTMENT REPORTS AND DISCUSSION ITEMS

7.1. Housing Choice Voucher Program



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Owner Frequently Asked Questions

On January 1, 2025, Omaha Housing Authority (OHA) will begin using Small Area Fair Market Rents (SAFMRs) to determine the payment standards applicable to the Housing Choice Voucher (HCV) Program. This handout answers some basic questions about SAFMRs.

What are SAFMRs?

SAFMRs are estimates of the typical rent for different unit sizes in a specific ZIP code. They are determined by the U.S. Department of Housing and Urban Development (HUD) each year, based on the distribution of all rents for standard quality housing within that ZIP code.

What are payment standards?

Payment standards are used to calculate the maximum subsidy the public housing agency (OHA) will pay toward rent and utilities for rental units leased to families with HCVs. Under the HCV Program, families are generally required to pay 30% of their adjusted income toward rent and utilities. OHA then pays the difference between the family's required contribution and either the payment standard or the gross rent (rent plus estimated utilities) of the unit, whichever is lower. HCV families may choose to pay more to live in a unit where rent and utilities exceed the payment standard but may not pay more than 40% of their adjusted income for rent and utilities when initially signing a lease.

Effective January 1, 2025, OHA will use different payment standards for different ZIP codes in its jurisdiction. The payment standard will be set as a percent of the SAFMRs for that ZIP code. Owners and tenants can use the SAFMR Payment Standard tables to determine the payment standard in a particular location.

What's new about this approach?

Previously, HUD required the OHA to base payment standards on Fair Market Rents (FMRs) calculated for the entire Metropolitan Area. This meant that payment standards may have been too low to enable HCV families to rent units in certain areas of opportunity and may have been higher than market rents in others. Under the new approach, the payment standard is based on the localized rent for each ZIP code. If your property is in a neighborhood where rents tend to be on the higher end of the Metropolitan Area, it is likely that the share of the rent Omaha Housing Authority will pay on behalf of the tenant will increase. At the same time, the payment standards in many low-cost areas may likely be reduced, meaning the tenant's share of the rent and utility could increase, depending on the amount of the rent.

How will I be impacted?

How you will be impacted by SAFMRs depends on the location of the properties that you own. The change in methodology used to calculate payment standards means that families with vouchers may now be able to afford units in parts of town with higher rents. If you own units in these areas, please consider opening your doors to HCV families as voucher amounts will be comparable to the market. If you currently rent to individuals and families with HCVs, you will receive a letter from OHA with details about how your properties will be impacted by changing payment standards. Additional information about impacts on tenants who rent units in your properties will be shared as their reexaminations are completed.

Effective January 1, 2025, OHA has adopted a “**Hold Harmless**” policy concerning a decrease in payment standards. This means that OHA will use the payment standard in effect prior to the decrease when determining your family’s assistance as long as the family continues to reside in the assisted unit.

Please be aware that all HAP Contracts will remain subject to rent reasonableness determinations and tenant affordability, including in areas where payment standards increase.



Omaha Housing Authority

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New Participant FAQ with Sample Subsidy Calculations

On January 1, 2025, Omaha Housing Authority (OHA) began using Small Area Fair Market Rents (SAFMRs) (Small Area Fair Market Rents) to calculate rental assistance in the Housing Choice Voucher (HCV) Program. This handout answers some basic questions about SAFMRs and opportunities under this approach. Please visit our website at <https://ohauthority.org> or contact your Housing Specialist for additional information.

What are SAFMRs?

A Small Area Fair Market Rent (SAFMR) is a rent level for the Housing Choice Voucher (HCV) Program that determines payment standards based on ZIP codes instead of entire metropolitan areas. The U.S. Department of Housing and Urban Development (HUD) implemented SAFMRs to more precisely represent rental costs in specific neighborhoods, thereby enhancing housing options for voucher holders. SAFMRs are set by HUD each year.

What are payment standards?

Payment standards are used to calculate the maximum subsidy the public housing agency (PHA) will pay for your rental unit. Under the HCV Program, you are generally required to pay 30% of your adjusted income for rent and utilities. The PHA covers the difference between your required contribution and the lower amount of either the payment standard or the gross rent (which includes rent plus estimated utilities) of the unit. For more information about this calculation, contact your Housing Specialist.

Gross Rent BELOW Payment Standard:

The payment standard for a ZIP code is **\$800**.

Rent is \$600 with all utilities included.

The gross rent (rent + utilities) for a unit you're interested in is **\$600**.

Since the gross rent is less than the payment standard, the gross rent becomes the family's payment standard.

30% of your monthly adjusted income is **\$500**.

The PHA's HAP equals the gross rent (\$600) minus 30% of your monthly adjusted income (\$500) is **\$100**. The tenant rent equals the gross rent (\$600) minus the PHA's HAP (\$100), which is **\$500**.

Gross Rent ABOVE Payment Standard:

The payment standard for a ZIP code is **\$700**.
Rent is \$750 with all utilities included.

The gross rent (rent + utilities) for a unit you're interested in is **\$750**.
30% of your monthly adjusted income is **\$600**.
40%* of adjusted income is **\$800**.

The PHA's HAP is equal to the payment standard (\$700) minus 30% of your monthly adjusted income (\$600), which is \$100.

The tenant rent is the balance of the gross rent (\$750) minus the HAP (\$100), which is **\$650**.

*Because the gross rent exceeds the payment standard, the 40% rule on tenant monthly adjusted income applies to new HAP Contracts.

Effective January 1, 2025, OHA payments standards will be set by ZIP Code. Use the SAFMR Payment Standard Lookup Tables and ZIP Code Area Map to determine the payment standard in specific neighborhoods.

What's new about this approach?

Previously, the amount the PHA would contribute towards rent for families with vouchers was based on rental rates for the entire metropolitan area. The new approach, however, uses the localized rent within each ZIP code (the SAFMR) to determine the amount of assistance families with vouchers are eligible to receive. Use of this new approach is required by HUD.

How will I be affected?

When leasing a new unit, you can still select one that meets your needs, subject to PHA requirements. However, you will now have more options, including expanded options to choose a home in areas with good schools, lower poverty, transportation, and access to grocery stores, parks, and other amenities. If you move to or stay in a neighborhood with lower rents, you may face a lower payment standard and receive less assistance towards your rent.

How can the PHA help me access opportunity neighborhoods?

Your Housing Specialist will also show you how to use myhousingsearch.com to look at listings of available rentals, how to calculate the amount of rent assistance you will receive, and how to determine the amount of rent you will pay in various units and areas.



Omaha Housing Authority

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Hold Harmless Notification

The U.S. Department of Housing and Urban Development (HUD) requires Omaha Housing Authority (OHA) to implement Small Area Fair Market Rent (SAFMR) payment standards no later than January 1, 2025. In the ZIP code where you reside, the payment standard may decrease.

SAFMRs are Fair Market Rent (FMRs) calculated at the ZIP code level rather than for the entire metropolitan area. SAFMRs allow for payment standards to be established that more accurately reflect the local market and are intended to provide families with more access to low-poverty, high-opportunity areas.

Payment standards determine how much assistance OHA can make in Housing Assistance Payments (HAPs) on behalf of program participants.

Effective January 1, 2025, OHA has adopted a “**Hold Harmless**” policy concerning a **decrease** in payment standards. This means that OHA will use the payment standard in effect prior to the decrease when determining your family’s assistance as long as the family continues to reside in the assisted unit.

OHA chose not to reduce the payment standard amount if the family resides in the current unit receiving assistance. Therefore, if the family remains in the same unit, the assistance will not be affected by the decrease in payment standard for the ZIP code.

The tenant’s share of the rent to the owner may also be affected when there is a change in the utility allowance schedule, a change in the family composition, or a change in the family’s adjusted monthly income.

For program participants moving into new units, assistance will be based on the new payment standards.

For further information about this policy and how it pertains to your subsidy, please contact your OHA at (402)444-6900.

Memorandum



To: Joanie Poore, Chief Executive Officer
HCV Staff
Interested Parties

From: Philisa Smith, Director HCV Program

Date: November 21, 2024

Re: 2025 Small Area Fair Market Rents
Federal Register / VOL 89 No.157

****Designated Small Area Fair Market Rent (SAFMR) Areas: ****

The OHA (Housing Authority) has been designated by the U.S. Department of Housing and Urban Development (HUD) as a Public Housing Agency (PHA) for the purpose of implementing Small Area Fair Market Rents (SAFMR). In accordance with 24 CFR 888.113(c)(3), OHA is required to adopt SAFMR-based payment standards by January 1, 2025.

SAFMRs will apply to all tenant-based vouchers within OHA's jurisdiction, including special vouchers such as the Veterans Affairs Supportive Housing (HUD-VASH) Program, and specific housing types such as Single Room Occupancies (SROs) and homeownership vouchers. The PHA may choose to apply SAFMRs to Project-Based Voucher (PBV) units as permitted under 24 CFR 888.113(c)(5) and (h).

OHA will not apply SAFMRs to the PBV Program. Instead, the Metropolitan Area Fair Market Rents (MAFMRs) will be used for the PBV Program. All PBV rents must comply with rent reasonableness requirements, OHA's PBV Program policies outlined in this plan, and any other applicable rent-setting regulations in accordance with 24 CFR 983.301.

Table 1: HUD-Published SAFMRs

Table 2: OHA Payment Standards

Omaha/Metro Small Area Fair Market Rate (SAFMRs) by Unit Bedrooms Effective 1/1/2025

***Table 1: HUD published SAFMR**

SAFMR FY 25 ZIP Code	Efficiency	One- Bedroom	Two- Bedroom	Three- Bedroom	Four- Bedroom	Five- Bedroom	Six- Bedroom	Seven- Bedroom	Eight- Bedroom	Nine Bedroom
FY 24 FMR	\$895	\$971	\$1,170	\$1,562	\$1,733	\$1,992	\$2,252	\$2,512	\$2,772	\$3,032
68046	\$1,020	\$1,080	\$1,300	\$1,730	\$1,920	\$2,208	\$2,496	\$2,784	\$3,072	\$3,360
68102	\$1,230	\$1,310	\$1,570	\$2,090	\$2,320	\$2,668	\$3,016	\$3,364	\$3,712	\$4,060
68104	\$890	\$950	\$1,140	\$1,510	\$1,690	\$1,943	\$2,197	\$2,450	\$2,704	\$2,957
68105	\$920	\$980	\$1,170	\$1,550	\$1,730	\$1,989	\$2,249	\$2,508	\$2,768	\$3,027
68106	\$1,030	\$1,090	\$1,310	\$1,740	\$1,940	\$2,231	\$2,522	\$2,813	\$3,104	\$3,395
68107	\$930	\$980	\$1,180	\$1,570	\$1,740	\$2,001	\$2,262	\$2,523	\$2,784	\$3,045
68108	\$990	\$1,050	\$1,260	\$1,670	\$1,860	\$2,139	\$2,418	\$2,697	\$2,976	\$3,255
68110	\$850	\$900	\$1,080	\$1,430	\$1,600	\$1,840	\$2,080	\$2,320	\$2,560	\$2,800
68111	\$820	\$880	\$1,060	\$1,410	\$1,560	\$1,794	\$2,028	\$2,262	\$2,496	\$2,730
68112	\$1,090	\$1,160	\$1,390	\$1,850	\$2,050	\$2,357	\$2,665	\$2,972	\$3,280	\$3,587
68113	\$1,260	\$1,340	\$1,610	\$2,140	\$2,380	\$2,737	\$3,094	\$3,451	\$3,808	\$4,165
68114	\$1,110	\$1,180	\$1,420	\$1,890	\$2,100	\$2,415	\$2,730	\$3,045	\$3,360	\$3,675
68116	\$1,190	\$1,260	\$1,510	\$2,010	\$2,230	\$2,564	\$2,899	\$3,233	\$3,568	\$3,902
68117	\$1,110	\$1,180	\$1,420	\$1,890	\$2,100	\$2,415	\$2,730	\$3,045	\$3,360	\$3,675
68118	\$1,470	\$1,560	\$1,870	\$2,480	\$2,760	\$3,174	\$3,588	\$4,002	\$4,416	\$4,830
68122	\$1,160	\$1,230	\$1,480	\$1,970	\$2,190	\$2,518	\$2,847	\$3,175	\$3,504	\$3,832
68123	\$1,070	\$1,130	\$1,360	\$1,810	\$2,010	\$2,311	\$2,613	\$2,914	\$3,216	\$3,517
68124	\$1,050	\$1,120	\$1,340	\$1,780	\$1,980	\$2,277	\$2,574	\$2,871	\$3,168	\$3,465
68127	\$980	\$1,040	\$1,250	\$1,660	\$1,850	\$2,127	\$2,405	\$2,682	\$2,960	\$3,237
68128	\$1,060	\$1,130	\$1,350	\$1,790	\$2,000	\$2,300	\$2,600	\$2,900	\$3,200	\$3,500
68130	\$1,370	\$1,460	\$1,750	\$2,320	\$2,590	\$2,978	\$3,367	\$3,755	\$4,144	\$4,532
68131	\$890	\$950	\$1,140	\$1,510	\$1,690	\$1,943	\$2,197	\$2,450	\$2,704	\$2,957
68132	\$860	\$910	\$1,090	\$1,450	\$1,610	\$1,851	\$2,093	\$2,334	\$2,576	\$2,817

68133	\$1,300	\$1,380	\$1,660	\$2,210	\$2,450	\$2,817	\$3,185	\$3,552	\$3,920	\$4,287
68134	\$940	\$1,000	\$1,200	\$1,590	\$1,770	\$2,035	\$2,301	\$2,566	\$2,832	\$3,097
68135	\$1,480	\$1,580	\$1,890	\$2,510	\$2,790	\$3,208	\$3,627	\$4,045	\$4,464	\$4,882
68136	\$1,340	\$1,430	\$1,710	\$2,270	\$2,530	\$2,909	\$3,289	\$3,668	\$4,048	\$4,427
68137	\$1,120	\$1,190	\$1,430	\$1,900	\$2,110	\$2,426	\$2,743	\$3,059	\$3,376	\$3,692
68138	\$930	\$990	\$1,190	\$1,580	\$1,760	\$2,024	\$2,288	\$2,552	\$2,816	\$3,080
68142	\$1,300	\$1,380	\$1,650	\$2,190	\$2,440	\$2,806	\$3,172	\$3,538	\$3,904	\$4,270
68144	\$940	\$1,000	\$1,200	\$1,590	\$1,770	\$2,035	\$2,301	\$2,566	\$2,832	\$3,097
68147	\$980	\$1,040	\$1,250	\$1,660	\$1,850	\$2,127	\$2,405	\$2,682	\$2,960	\$3,237
68152	\$880	\$930	\$1,120	\$1,490	\$1,660	\$1,909	\$2,158	\$2,407	\$2,656	\$2,905
68154	\$980	\$1,040	\$1,250	\$1,660	\$1,850	\$2,127	\$2,405	\$2,682	\$2,960	\$3,237
68164	\$1,120	\$1,190	\$1,430	\$1,900	\$2,110	\$2,426	\$2,743	\$3,059	\$3,376	\$3,692

Omaha Metro FMR Area Small Area Payment Standards by Unit Bedrooms Effective 1/1/2025

***Table 2: OHA Payment Standards**

PS FY 25 ZIP Code	Efficiency	One- Bedroom	Two- Bedroom	Three- Bedroom	Four- Bedroom	Five- Bedroom	Six- Bedroom	Seven- Bedroom	Eight- Bedroom	Nine- Bedroom	%SAFMR
FY 24 PS	\$1,074	\$1,165	\$1,404	\$1,874	\$2,079	\$2,390	\$2,702	\$3,014	\$3,326	\$3,638	120%
68046	\$1,224	\$1,296	\$1,560	\$2,076	\$2,304	\$2,649	\$2,995	\$3,340	\$3,686	\$4,032	120%
68102	\$1,230	\$1,310	\$1,570	\$2,090	\$2,320	\$2,668	\$3,016	\$3,364	\$3,712	\$4,060	100%
68104*	\$1,068	\$1,140	\$1,368	\$1,812	\$2,028	\$2,331	\$2,636	\$2,940	\$3,244	\$3,548	120%
68105	\$1,104	\$1,176	\$1,404	\$1,860	\$2,076	\$2,386	\$2,698	\$3,009	\$3,321	\$3,632	120%
68106	\$1,184	\$1,253	\$1,506	\$2,001	\$2,231	\$2,565	\$2,900	\$3,234	\$3,569	\$3,904	115%
68107	\$1,116	\$1,176	\$1,416	\$1,884	\$2,088	\$2,401	\$2,714	\$3,027	\$3,340	\$3,654	120%
68108	\$1,188	\$1,260	\$1,512	\$2,004	\$2,232	\$2,566	\$2,901	\$3,236	\$3,571	\$3,906	120%
68110*	\$1,020	\$1,080	\$1,296	\$1,716	\$1,920	\$2,208	\$2,496	\$2,784	\$3,072	\$3,360	120%
68111*	\$984	\$1,056	\$1,272	\$1,692	\$1,872	\$2,152	\$2,433	\$2,714	\$2,995	\$3,276	120%
68112	\$1,253	\$1,334	\$1,598	\$2,127	\$2,357	\$2,710	\$3,064	\$3,417	\$3,772	\$4,125	115%
68113	\$1,386	\$1,474	\$1,771	\$2,354	\$2,618	\$3,010	\$3,403	\$3,796	\$4,188	\$4,581	110%
68114	\$1,276	\$1,357	\$1,633	\$2,173	\$2,415	\$2,777	\$3,139	\$3,501	\$3,864	\$4,226	115%
68116	\$1,309	\$1,386	\$1,661	\$2,211	\$2,453	\$2,820	\$3,188	\$3,556	\$3,924	\$4,292	110%
68117	\$1,276	\$1,357	\$1,633	\$2,173	\$2,415	\$2,777	\$3,139	\$3,501	\$3,864	\$4,226	115%
68118	\$1,470	\$1,560	\$1,870	\$2,480	\$2,760	\$3,174	\$3,588	\$4,002	\$4,416	\$4,830	100%
68122	\$1,276	\$1,353	\$1,628	\$2,167	\$2,409	\$2,769	\$3,131	\$3,492	\$3,854	\$4,215	110%
68123	\$1,230	\$1,299	\$1,564	\$2,081	\$2,311	\$2,657	\$3,004	\$3,351	\$3,698	\$4,044	115%
68124	\$1,207	\$1,288	\$1,541	\$2,047	\$2,277	\$2,618	\$2,960	\$3,301	\$3,643	\$3,984	115%
68127	\$1,176	\$1,248	\$1,500	\$1,992	\$2,220	\$2,552	\$2,886	\$3,218	\$3,552	\$3,884	120%
68128	\$1,219	\$1,299	\$1,552	\$2,058	\$2,300	\$2,645	\$2,990	\$3,335	\$3,680	\$4,025	115%
68130	\$1,370	\$1,460	\$1,750	\$2,320	\$2,590	\$2,978	\$3,367	\$3,755	\$4,144	\$4,532	100%
68131*	\$1,068	\$1,140	\$1,368	\$1,812	\$2,028	\$2,331	\$2,636	\$2,940	\$3,244	\$3,548	120%
68132*	\$1,032	\$1,092	\$1,308	\$1,740	\$1,932	\$2,221	\$2,511	\$2,800	\$3,091	\$3,380	120%

68133	\$1,300	\$1,380	\$1,660	\$2,210	\$2,450	\$2,817	\$3,185	\$3,552	\$3,920	\$4,287	100%
68134	\$1,128	\$1,200	\$1,440	\$1,908	\$2,124	\$2,442	\$2,761	\$3,079	\$3,398	\$3,716	120%
68135	\$1,480	\$1,580	\$1,890	\$2,510	\$2,790	\$3,208	\$3,627	\$4,045	\$4,464	\$4,882	100%
68136	\$1,340	\$1,430	\$1,710	\$2,270	\$2,530	\$2,909	\$3,289	\$3,668	\$4,048	\$4,427	100%
68137	\$1,288	\$1,368	\$1,644	\$2,185	\$2,426	\$2,789	\$3,154	\$3,517	\$3,882	\$4,245	115%
68138	\$1,116	\$1,188	\$1,428	\$1,896	\$2,112	\$2,428	\$2,745	\$3,062	\$3,379	\$3,696	120%
68142	\$1,300	\$1,380	\$1,650	\$2,190	\$2,440	\$2,806	\$3,172	\$3,538	\$3,904	\$4,270	100%
68144	\$1,128	\$1,200	\$1,440	\$1,908	\$2,124	\$2,442	\$2,761	\$3,079	\$3,398	\$3,716	120%
68147	\$1176	\$1248	\$1500	\$1992	\$2220	\$2552	\$2886	\$3218	\$3552	\$3884	120%
68152*	\$1,056	\$1,116	\$1,344	\$1,788	\$1,992	\$2,290	\$2,589	\$2,888	\$3,187	\$3,486	120%
68154	\$1,176	\$1,248	\$1,500	\$1,992	\$2,220	\$2,552	\$2,886	\$3,218	\$3,552	\$3,884	120%
68164	\$1,288	\$1,368	\$1,644	\$2,185	\$2,426	\$2,789	\$3,154	\$3,517	\$3,882	\$4,245	115%

7.2. Asset Management (Public Housing)

Housing Operations Board Report

December 2024 Meeting

PHAS

OHA's MASS (Management Assessment Subsystem) score has **increased** from 16.89 in September to 17.39 in October. OHA's goal is to achieve at least 15 points overall and 22 points in as many properties as possible (out of 25 possible points). We currently have 12 out of 18 AMP's (Asset Management Project) scoring 15 or higher. Additionally, we have 5 of the 12 AMP's scoring 22 points.

Occupancy

The overall occupancy rate for Public Housing remained consistent from 97% in September to 97% in October. OHA's goal is to be at 96% occupancy and strive toward 98% in as many properties as possible. We had 11 of 23 properties achieve occupancy rates of 98% or higher, which is 1 more than the previous month.

- Market-Rate Housing: occupancy continues to be affected by Arbor Villas; Arbor Villas is no longer leasing due to CNI South redevelopment efforts. Please note that the 10 vacant units at Arbor Villas are not available for leasing; therefore, the property is 100% occupied based upon available units.
- North Villas (75% occupancy rate) has been prioritized by our new Maintenance Manager in Multi-Family Scattered Site to get the 4 vacant units ready for leasing. In October, we had one unit made ready and leased. As I write this report the remaining 3 units are now available for leasing. These are nice units and should see 100% occupancy soon.
- Affordable Housing: occupancy rates **decreased** from 89.6% in September to 87.5% in October. Chambers Court continues to have occupancy issues because of the homeless population literally next door and across the street from the property. Repairing and securing doors that have been repeatedly broken into is a challenge. Increased patrols from Public Safety have had a positive effect but it is still a struggle.

Tenant Accounts Receivable (TAR)

OHA's TAR ratio (past due rent/ total rent due) for public housing remained at 0.91 from September through October. Past due rent in public housing **decreased** by \$7,926. Tenant revenue **decreased** by \$12,866.

Maintenance

The on-time completion rates for work orders **decreased** from 60% in September to 56% in October. This decrease is partially attributed to data quality concerns that were discovered in double checking the Maintenance Manager's data reporting. Housing Operations will conduct future trainings with the Maintenance staff to increase reporting reliability. The total number of outstanding work orders **increased** from 1510 in September to 1767 in October. The Scattered Site Single Family properties (4 of the 24 AMPS) account for 1,263 or 71% of the work orders; this number has **decreased** from 1,308

in September. OHA has hired additional Maintenance Repairers in the scattered site zones to assist in reducing the outstanding workorders.

REAC (Real Estate Assessment Center)

REAC inspections assess a property's safety, cleanliness, and management. They include a review of items like HVAC, lighting, trash receptacles, and plumbing. A score of 90 to 100 is a great score resulting in a property being inspected every 3 years. A score of 80 to 89 is a good score and the property will be inspected every 2 years. A score of 79 or below results in an inspection every year.

The 2024 REAC scoring was significantly higher than the prior year's inspections; the color coding on the Maintenance Scorecard provides a visual of the success from this year's efforts.

OHA Maintenance Report
10/31/2024

Region	Property	PH Units	Physical		Work Orders Completion						MR
			2022 REAC Score	2023/24 REAC Score	Total Complete	% Complete On-Time	# Open	Prev Mo % Open	% Open / Units	# Open Trend	# Not Ready 60+ Days
North	Evans	110	72	95	29	83%	5	0%	5%	↑	0
	Florence	106	83	Exempt	104	44%	68	0%	64%	↑	0
	Underwood	104	82	93	144	50%	18	0%	17%	↑	0
North Central	Benson	143	85	Exempt	74	96%	9	0%	6%	↑	0
	Crown	149	88	Exempt	101	98%	8	0%	5%	↑	0
Central	Jackson	207	58	88	164	99%	8	9%	4%	↓	0
	ParkSouth	221	78	95	128	95%	21	0%	10%	↑	0
South	Pine	143	86	Exempt	118	39%	77	5%	54%	↑	0
	KayJay	117	72	92	164	90%	18	6%	15%	↑	0
	Highland	106	72	89	91	77%	25	6%	24%	↑	0
SS	Southside	356	53	84	303	33%	202	6%	57%	↑	NA
Single Family	SCNE	225	64	66	543	27%	357	195%	159%	↓	0
	SCSE	137	68	53	293	25%	210	191%	153%	↓	0
	SCNW	115	70	73	297	30%	159	194%	138%	↓	0
	SCSW	75	43	59	130	14%	135	161%	180%	↑	0
Multi Family	Keystone	37	62	64	100	36%	80	197%	216%	↑	2
	Chambers	70	26	93	107	79%	29	49%	41%	↓	5
	Farnam	30	56	80	40	68%	19	47%	63%	↑	0
	ParkVilla	24	NA	NA	38	39%	20	104%	83%	↓	2
	NOAH	24	64	43	55	20%	40	225%	167%	↓	1
	Crown1	16	40	92	21	14%	29	113%	181%	↑	1
	Crown2	12	63	83	40	23%	21	267%	175%	↓	0
	Bayview	12	69	90	33	55%	25	183%	208%	↑	0
Trades	Villas	32	NA	NA	35	66%	16	47%	50%	↑	3
	Paint		NA	NA	113	69%	83	NA	NA	NA	NA
	PestControl		NA	NA	1334	100%	85	NA	NA	NA	NA
OHA PASS Score		2571	TOTAL / AVE			56%	1767	66%	69%	↑	14

OHA Property Management Report

October 31, 2024

PUBLIC HOUSING

Development			Occupancy				Tenant Accounts Recievable					Net Operating Income			PHAS
Type	Property Name	Total Units	Prev Mo # Vacant	Current Mo # Vacant	Current Mo % Occupied	Trend	TAR Balance	Tenant Revenue	Prev Mo TAR Ratio	Current Mo TAR Ratio	TAR Trend	YTD Actual	YTD Budget	YTD Variance	MASS Points (of 25)
Towers	Florence Tower	106	3	3	97.1%	-	\$ 33,803	\$ 22,316	1.40	1.51	↑	\$ (35,585)	\$ (28,852)	\$ (6,733)	14
	Benson Tower	143	2	3	97.9%	↓	\$ 35,123	\$ 26,852	1.38	1.31	↓	\$ (89,495)	\$ (160,319)	\$ 70,824	18
	Jackson Tower	207	16	22	89.3%	↓	\$ 75,685	\$ 43,556	1.70	1.74	↑	\$ (224,111)	\$ (242,908)	\$ 18,797	6
	Park South Tower	221	11	14	93.6%	↓	\$ 86,535	\$ 54,786	1.44	1.58	↑	\$ (298,758)	\$ (272,100)	\$ (26,658)	10
	Highland Tower	106	1	2	98.1%	↓	\$ 32,633	\$ 24,844	2.07	1.31	↓	\$ (130,024)	\$ (76,477)	\$ (53,547)	22
	Pine Tower	143	2	2	98.6%	↓	\$ 38,171	\$ 30,895	1.10	1.24	↑	\$ 5,847	\$ (26,170)	\$ 32,017	22
Elderly	Evans Tower	110	7	4	96.4%	↑	\$ 22,319	\$ 31,663	0.59	0.70	↓	\$ (54,624)	\$ (25,793)	\$ (28,831)	18
	Crown Tower	149	5	2	98.6%	↑	\$ 32,010	\$ 44,231	0.72	0.72	-	\$ (244,396)	\$ (370,832)	\$ 126,436	20
	Underwood Tower	104	2	3	97.1%	↓	\$ 28,096	\$ 34,816	0.70	0.81	↑	\$ (22,348)	\$ (37,624)	\$ 15,276	13
	Kay Jay Tower	117	1	0	100.0%	-	\$ 7,535	\$ 31,558	0.37	0.24	↓	\$ (23,421)	\$ (52,069)	\$ 28,648	22
Multi Family	Southside	356	0	0	100.0%	-	\$ 11,785	\$ 56,222	0.00	0.21	↓	\$ 74,204	\$ 222,439	\$ (148,235)	21
	Park Villa	24	2	0	100.0%	↓	\$ 5,602	\$ 3,306	1.36	1.69	↑	\$ (98,342)	\$ 85,691	\$ (184,033)	21
	Chambers Court	32	3	2	93.8%	↑	\$ 25,959	\$ 36,581	0.90	0.71	↓	\$ (32,202)	\$ (151,772)	\$ 119,570	10
	Farnam	20	0	0	100.0%	-	\$ 9,391	\$ 10,787	1.01	0.87	↓	\$ (80,963)	\$ 14,266	\$ (95,229)	NA
	Bayview	12	0	0	100.0%	-	\$ 1,948	\$ 7,434	0.29	0.26	↓	\$ (14,589)	\$ 74,335	\$ (88,924)	22
Single Family Homes/ Duplexes	Scat-Site North East	225	4	4	98.2%	-	\$ 90,152	\$ 66,773	1.19	1.35	↑	\$ 104,239	\$ (210,971)	\$ 315,210	22
	N. Omaha Afford Home	24	1	1	95.8%	-	\$ 13,222	\$ 10,983	0.79	1.20	↑	\$ (84,653)	\$ (29,044)	\$ (55,609)	NA
	Crown I	16	1	1	93.8%	-	\$ 956	\$ 1,552	0.43	0.62	↑	\$ 10,463	\$ 32,210	\$ (21,747)	NA
	Crown II	12	0	0	100.0%	-	\$ 6,100	\$ 3,355	1.45	1.82	↑	\$ (22,026)	\$ (18,805)	\$ 3,221	NA
	Scat-Site South East	137	5	4	98.5%	↑	\$ 16,051	\$ 40,567	0.40	0.40	-	\$ 208,057	\$ (17,552)	\$ 225,609	22
	Scat-Site North West	115	3	5	95.7%	↓	\$ 38,503	\$ 52,887	0.78	0.73	↓	\$ 117,213	\$ (1,475)	\$ 118,688	13
	Keystone Crown Creek	37	2	0	100.0%	-	\$ 7,636	\$ 6,879	0.82	1.11	↑	\$ 159,971	\$ (208,620)	\$ 43,649	NA
	Scat-Site South West	75	4	3	96.0%	↑	\$ (4,937)	\$ 28,986	-0.02	-0.02	-	\$ 30,273	\$ 40,826	\$ 83,589	17
Total		2491	75	75	97.0%	↓	\$ 614,278	\$ 671,829	0.91	0.91	-	\$ (745,270)	\$ (1,461,616)	\$ 491,988	17.39

MARKET RATE HOUSING

Type	Property Name	Total Units	Prev Mo # Vacant	Current Mo # Vacant	Current Mo % Occupied	Trend	TAR Balance	Tenant Revenue	Prev Mo TAR Ratio	Current Mo TAR Ratio	TAR Trend	YTD Actual	YTD Budget	YTD Variance
	The Villas	20	10	10	100.0%	-	\$ (3,947)	\$ 15,835	0.19	-0.25	↓	\$ (33,670)	\$ (60,592)	\$ 26,922
	North Villa	12	4	3	75%	-								

AFFORDABLE HOUSING

Development			Occupancy				Tenant Accounts Recievable					Net Operating Income		
Type	Property Name	Total Units	Prev Mo # Vacant	Current Mo # Vacant	Current Mo % Occupied	Trend	TAR Balance	Tenant Revenue	Prev Mo TAR Ratio	Current Mo TAR Ratio	TAR Trend	YTD Actual	YTD Budget	YTD Variance
Multi	Chambers Court	38	5	6	84.2%	↑								
	Farnam	10	0	0	100.0%	-								

Total		48	5	6	87.5%	↓								

7.3. Housing in Omaha, Inc.

7.4. River City Housing Connections

7.5. Compliance

Memorandum



To: The Board of Commissioners

From: Susan Gilroy, Director of Compliance

Date: November 7, 2024

Re: Compliance Department Update- September 2024

Intake Department

The Public Housing waiting list remains closed for all bedroom sizes. There was a total of 24 approved applications in September for seventeen 1- bedrooms, four 2-bedrooms, two 3-bedrooms and one 4-bedroom. In addition, there were two applications approved for Chambers Court and one application for Farnam Apartments- LIHTC (non-PH) apartments. There was also one application approved for Villas North.

There were 53 applications withdrawn from the waiting list during September with 26 for no response, 22 for applicant requests, 3 for failed background checks and 2 refused housing offers.

Intake staff have been working mainly on processing senior applications along with updating already approved files that did not receive a unit offer before the files expired. We selected all the senior applicants on the one bedroom wait list. The Intake Manager and Leasing Coordinators work to balance out the number of files that Intake processes with the number of vacant units that are ready to be filled.

The Public Housing one bedroom wait list did open on 10/3/24 and there was a great response from people needing housing, which included a large number of senior applicants. We selected seniors off the list and Intake staff are concentrating their efforts on processing files to fill the vacancies at the senior developments where needed.

Housing Clerks continue to process applicants for our LIHTC units and for transfer files for the dual PH/LIHTC openings. We included information on our affordable housing units available along with the one bedroom wait list opening announcement.

There is now an open position for Housing Clerk. HR is scheduling interviews for prospective candidates.

Recertifications

HUD's monthly Re-examination Delinquency Report for September continued the downward trend from 78.86% to 76.80% but our staff's efforts in completing the required numbers of files will be reflected in our completion rate increase at the end of October. We identify specific files for completion so that we can show more files completed than the number of new files that are being added for the specific month. The Quality Control Specialists will continue to have a caseload through the end of the year or until the newer staff are fully trained and we are at an acceptable completion rate for both annual and interim recertifications.

The interim completion rate increased from 55% to 66% for the interims reported between 2023 through June 2024. The interims continue to be prioritized for residents with income decreases.

There was an open position again during October, but we were able to fill the position immediately. We have an experienced former Housing Compliance Specialist moving back to Omaha and will be starting in November. After a quick refresher, he will be able to get right back to processing the paperwork to complete the recertification process.

Process Improvements

During the month of September, Nicole worked with staff from Section 8, Property Management, Inspections, Compliance, FSS and IT:

Section 8- assisted with completion of request approvals for wait list and recertifications. Created and provided training on Interim report. Created a staff guide for reinstatement on the wait list

Compliance- continued training on updating interim log. Updated website and rent café with announcement of the wait list opening

Family Self Sufficiency- assisted with email blast out to participants for community meeting

IT- training and reviewing product for ticket system with Genuity

Property Management- created a quick staff guide for processing minimum hardship exemptions. Created special report with pivot tables to compare 2023 and 2024 data for pest control

Inspections- programmed a custom report to identify current residents with children under age 6 and created instructions for staff to run the report for all HCV properties to include year built with children under age 6 in household

Training classes were held for new staff in Section 8, Compliance, Maintenance, and PH Intake for Mobile Maintenance, Yardi Basics, Rent Café 101, Rent Café Annual/Interim/Wait list, P2P, new PH applications and Docu-Sign.

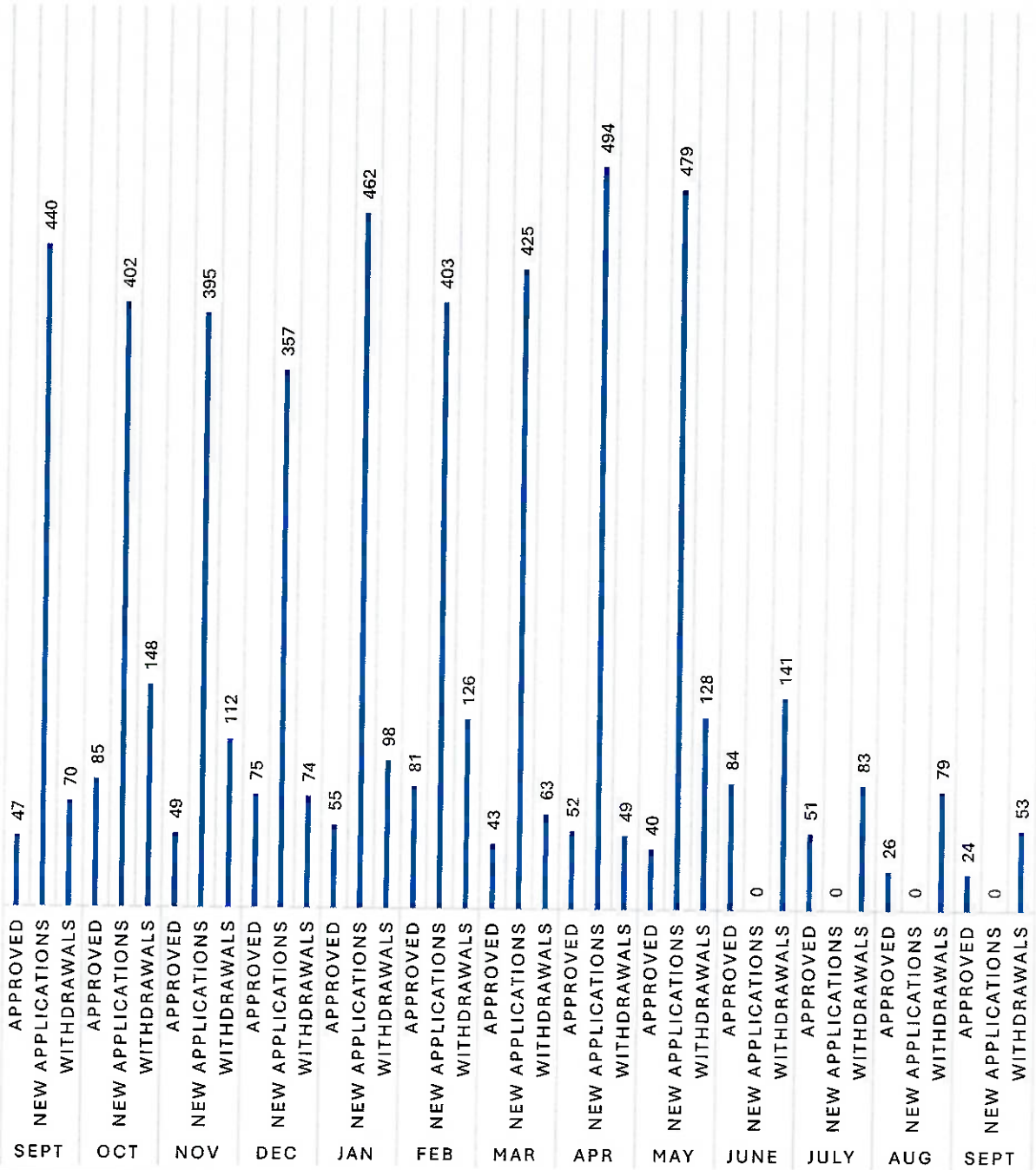
There were 7 cases submitted to Yardi. There were 128 requests from staff for assistance:

Requests by Department:

Capital Improvements	2
Compliance	18
Executive	2
Finance	16
Family Self Sufficiency	0
HR	19
Inspections	0
Intensive Services	1
IT	1
Leasing	4
Legal	3
Maintenance	15
PH Intake	4
Procurement	0
Property Management	12
Public Safety	3
Quality Improvement	5
Section 8	23

PUBLIC HOUSING INTAKE WAITING LIST

SEPTEMBER 2024



Memorandum



To: The Board of Commissioners

From: Susan Gilroy, Director of Compliance

Date: November 7, 2024

Re: Intake Approved Applications September 2024

Intake Department Month of September 2024

New Public Housing Applications 0

New Villas Housing Applications 0

New Farnam Straight Tax Credit Housing Applications 0

New Chambers Straight Tax Credit Housing Applications 0

Approved Public Housing Applications 24

Approved Applications for Villas 1

Approved Applications for Chambers Straight Tax Credit 2

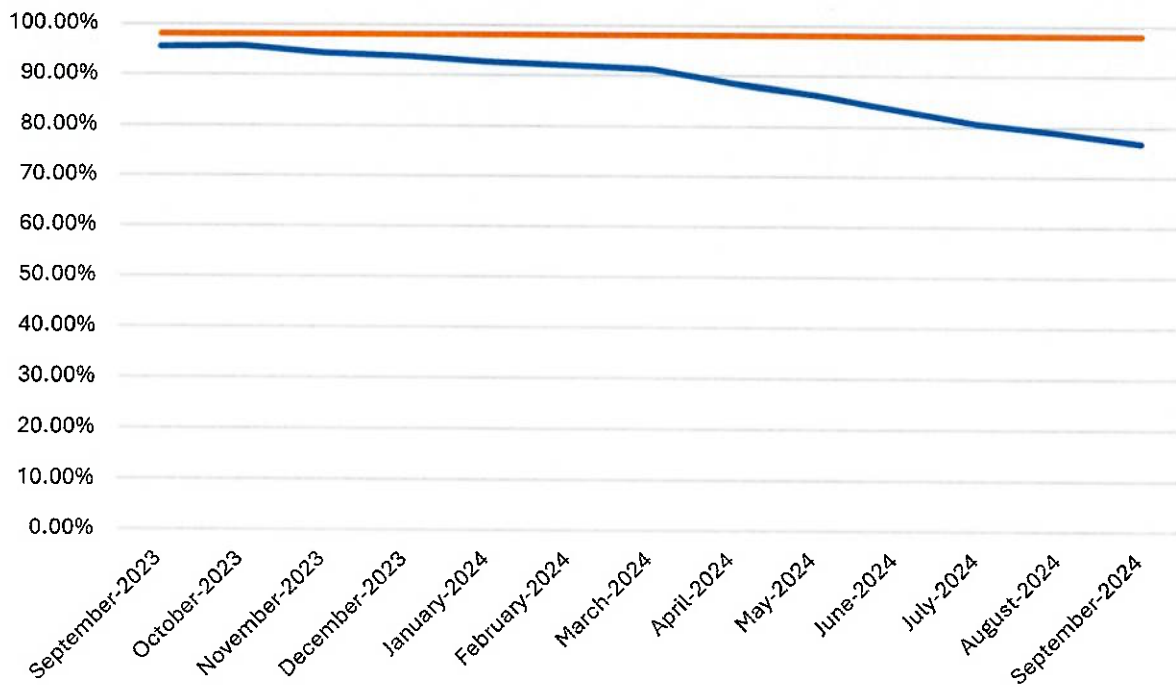
Approved Applications for Farnam Apts Straight Tax Credit 1

Public Housing Applications Approved by Bedroom Size	One	Two	Three	Four
	17	4	2	1
Villas Applications Approved	Two	Three		
North Villas	0	1		
Arbor Villa	0	0		
Chambers Court Straight Tax Credit Applications Approved	One	Two	Three	Four
	0	2	0	0
Farnam Apartments Straight Tax Credit Applications Approved	Two	Three		
	1	0		

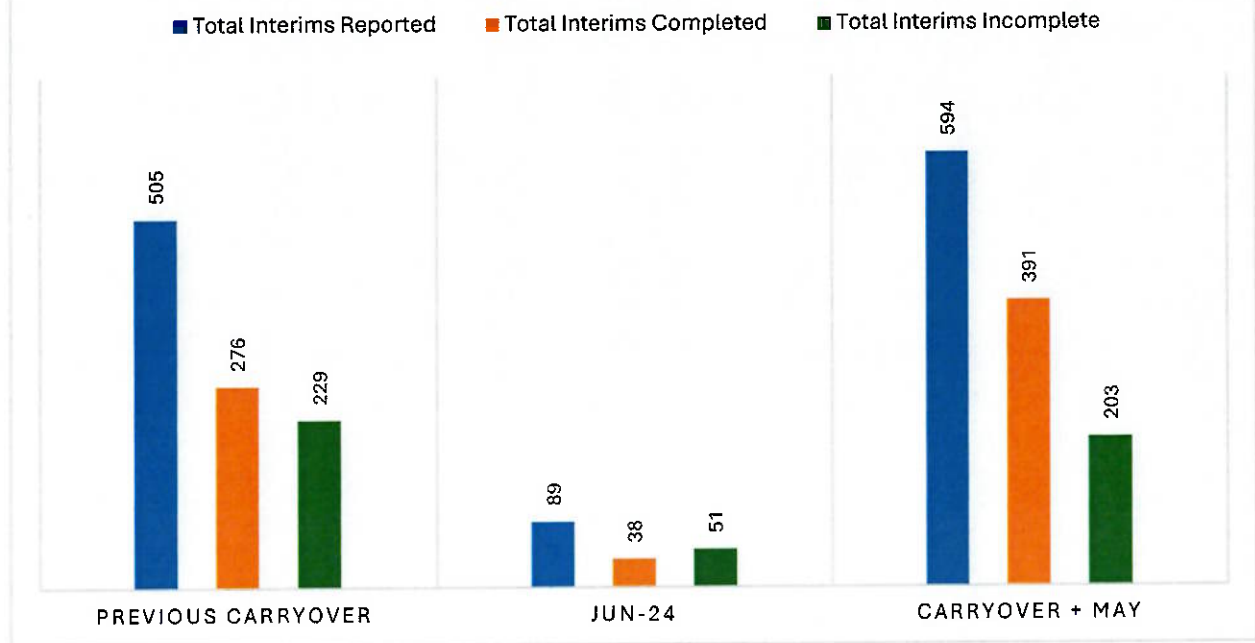
Applications Withdrawn from PH Wait List	53	
No Response During Full Application Process	26	
Owe monies to PHA	0	
Not Eligible to Apply	0	
Failed Background Check	3	
Applicant Request	22	
Refused Offer	2	
Over Income	0	

	HUD Goal
	Actual

HUD Reporting Rate for Annual Recertifications as of 9/30/24 76.80%



INTERIM COMPLETION RATE THROUGH JUNE 2024



89 residents reported new changes during the month of June. Housing Compliance Staff worked to complete the new and outstanding interims during this month. Overall, staff processed a total 115 interim files during the month of June.

7.6. Financials

Memorandum



To: Board of Commissioners
From: Ashley Hatheway, CFO
Date: November 14, 2024
Re: Finance Report

AGENCY BALANCE SHEET

October 2024:

Cash position decreased **\$878,798** YTD

- Public Housing (PH): had a decrease of **\$1,628,558**
- HIO: had an increase of **\$39,989**
- Section 8 Programs: had an increase of **\$310,678**
- Central Office: had an increase of **\$283,126**

Accounts Receivable had an increase of **\$84,171** YTD

- Operating A/R had a decrease of **\$298,511**
- A/R Inter-property had an increase of **\$227,606**
- Tenant Receivables had an increase of **\$155,694**
- A/R Promissory Notes had a decrease of **\$618**

Prepaid Assets had an increase of **\$690,246** YTD

Total Assets increased **\$52,576** YTD

Total Liabilities increased **\$1,146,310** YTD

Current Liabilities increased **\$1,117,233** YTD

- Unearned Revenue (HUD operating subsidy) increased **\$1,626,951**
- Accounts Payable decreased **\$377,677**
- Accrued Fees increased **\$227,606**
- Inter-fund Payables decreased **\$44,273**

Memorandum



To: Board of Commissioners
From: Ashley Hatheway, CFO
Date: November 14, 2024
Re: Finance Report

AGENCY BUDGET & PRIOR YEAR COMPARISON

Total Revenue is **\$2,061,636** more than PYTD revenue. October 2024 revenue was **\$558,348** more than prior year.

- Dwelling rents are down \$141k over PYTD
- Legal & maintenance fees are down \$288k
- HAP revenue is up \$3.4M due to HHR draws of \$3.2M YTD
- HUD soft costs are down \$1.2M (100% offset by expenses)
- Management & bookkeeping fees are \$267k higher than PYTD
- FLFs are down \$285k over PYTD

Total Operating Expenses are down \$836k YTD. October 2024 expenses are \$373k more than prior year

- Admin salaries are up over PYTD
- Resident expenses are up due to relocation efforts
- Total maintenance expenses are down over PYTD

HAP Expenses are **\$4.1M** more than PYTD. October HAP expenses were **\$780k** more than prior year.

Adjusted Net Operating Income was **\$1,448,268** YTD compared to **\$2,686,585** PYTD. October 2024 had adjusted net operating income of **\$125,870** vs. adjusted net operating income of **\$720,307** during October 2023.

Agency-Wide Balance Sheet -With YTD

Period = Oct 2024

Book = Accrual ; Tree = ysi_bs

	October 31, 2024	October 1, 2024	Net Change	January 1, 2024	YTD Net Change
ASSETS					
CASH - OPERATING	5,381,886	5,600,807	-218,922	6,335,666	-953,780
CASH - PAYROLL	451,525	84,214	367,312	486,982	-35,457
CASH - OTHER	46,499	46,465	33	48,168	-1,669
PETTY CASH	560	560	0	560	0
LEGAL FILINGS FUND	54	54	0	0	54
CASH - VENDOR PAYMENTS	-177,071	-98,255	-78,816	-132,130	-44,941
CASH - RESTRICTED	3,909,115	3,965,291	-56,176	3,869,166	39,949
CASH - RESTRICTED MODERNIZATION AND DEV	38,646	38,609	37	38,205	441
REPLACEMENT RESERVE	71,253	71,101	152	69,673	1,580
CASH - FSS ESCROW	600,754	598,163	2,591	574,458	26,296
CASH - FSS FORFEITURES	54,538	49,879	4,659	21,209	33,328
OPERATING RESERVE	273,891	273,333	558	268,157	5,734
OHA HUD OPERATING RESERVE	299,758	299,758	0	299,758	0
CASH - SECURITY DEPOSIT	661,534	680,474	-18,940	616,269	45,264
HOMEOWNERSHIP FUNDS	369,552	369,133	419	365,150	4,402
CASH AND CASH EQUIVALENTS	11,982,494	11,979,586	2,908	12,861,291	-878,797
A/R HUD	-60,145	17,362	-77,508	-151,641	91,496
A/R OTHER GOVERNMENTS	501,867	482,960	18,908	888,060	-386,192
A/R OTHER	1,800	1,800	0	1,800	0
A/R NON DWELLING RENT	8,713	15,039	-6,326	12,527	-3,814
A/R HOMEOWNERSHIP MORTGAGES	592,700	592,700	0	592,700	0
ALLOWANCE FOR HOME MORTGAGES	-592,700	-592,700	0	-592,700	0
ALLOWANCE FOR DOUBTFUL OTHER A/R	-653,262	-653,262	0	-653,262	0
OTHER ACCOUNTS RECEIVABLE	-201,027	-136,101	-64,926	97,484	-298,511
INTER-PROPERTY {COCC}	50,000	50,000	0	50,000	0
INTER-PROPERTY {9EC}	198,784	190,011	8,772	126,499	72,285
INTER-PROPERTY {9KCC}	93,428	90,987	2,441	68,159	25,270
INTER-PROPERTY {9NOAH}	58,080	56,483	1,597	41,509	16,571
INTER-PROPERTY {9FAR}	115,321	112,081	3,239	83,367	31,954
INTER-PROPERTY {9BV}	29,789	28,896	893	20,840	8,949
INTER-PROPERTY {9CR1}	44,791	43,726	1,065	33,738	11,053
INTER-PROPERTY {9CR2}	29,061	28,262	798	20,775	8,286
INTER-PROPERTY {VILLAS}	49,880	47,953	1,927	31,049	18,831
INTER-PROPERTY {HCV}	526,290	526,290	0	838,690	-312,400
INTER-PROPERTY {HCV ADM}	-436,045	-436,045	0	-831,320	395,275
INTER-PROPERTY {MOD REHAB}	1,774	1,774	0	1,774	0
INTER-PROPERTY {PUB HSG}	171,291	166,629	4,663	219,758	-48,467
A/R INTER-PROPERTY	932,443	907,048	25,396	704,837	227,606
ACCOUNTS RECEIVABLE TENANTS	807,881	822,068	-14,187	652,187	155,694
ALLOWANCE FOR A/R TENANTS	-62,909	-62,909	0	-62,909	0
A/R - TENANT	744,972	759,159	-14,187	589,278	155,694
P-NOTES OUTSTANDING	567,976	567,287	689	568,594	-618
ALLOWANCE FOR P-NOTES	-66,493	-66,493	0	-66,493	0
A/R BAYVIEW	387,861	387,861	0	387,861	0
A/R FARNAM	1,375,882	1,375,882	0	1,375,882	0
A/R STREHLOW	812,448	812,448	0	812,448	0
A/R NOAH	49,301	49,301	0	49,301	0
A/R PROMISSORY NOTES	3,126,975	3,126,286	689	3,127,593	-618
ACCRUED INTEREST RECEIVABLE	5,146,148	5,146,148	0	5,146,148	0
ACCRUED INTEREST RECEIVABLE	5,146,148	5,146,148	0	5,146,148	0
PREPAID INSURANCE	411,301	831,415	-420,114	142,025	269,276
PREPAID SOFTWARE EXP	396,395	396,395	0	152,700	243,694
PREPAID MED FSA SEC 125	3,538	1,379	2,159	1,160	2,378
PREPAID CREDIT CARDS	60,107	43,082	17,026	118	59,989
PREPAID OTHER	145,759	145,863	-104	30,851	114,908
PREPAID ASSETS	1,017,100	1,418,134	-401,034	326,854	690,245
INTERFUND BALANCE	-1,700	-1,700	0	-1,700	0
INTER-FUND DUE FROM {COCC}	433,374	433,293	81	436,574	-3,200
INTER-FUND DUE FROM {HIOOPER}	-201,683	-201,683	0	-201,648	-35
INTER-FUND DUE FROM {9EC}	233,383	217,366	16,017	160,591	72,792
INTER-FUND DUE FROM {9KCC}	56,140	54,166	1,974	25,683	30,457
INTER-FUND DUE FROM {9NOAH}	119,037	116,575	2,462	42,452	76,585
INTER-FUND DUE FROM {9SEC}	20,382	20,382	0	22,106	-1,725
INTER-FUND DUE FROM {9FAR}	16,916	14,641	2,275	16,456	460

INTER-FUND DUE FROM {9BV}	8,325	6,639	1,687	16,101	-7,776
INTER-FUND DUE FROM {9CR1}	12,195	11,640	555	15,375	-3,180
INTER-FUND DUE FROM {9CR2}	9,919	9,520	399	11,038	-1,119
INTER-FUND DUE FROM {VILLAS}	4,910	6,895	-1,984	22,213	-17,302
INTER-FUND DUE FROM {HCV ADM}	-154,635	-154,567	-68	-375,820	221,185
INTER-FUND DUE FROM {HCV MV}	-11,037	-10,959	-78	-15,295	4,258
INTER-FUND DUE FROM {HCV CITY}	37,650	37,650	0	239,963	-202,313
INTER-FUND DUE FROM {MOD REHAB}	4,587	4,206	381	44,668	-40,081
INTER-FUND DUE FROM {FOUND}	109,706	109,706	0	109,222	484
INTER-FUND DUE FROM {PUB HSG}	239,497	245,423	-5,927	833,579	-594,083
INTER-FUND DUE FROM {ROSS GRANT}	29,352	25,993	3,359	100,054	-70,702
INTER-FUND DUE FROM {FSS GRANT}	-120,168	-140,696	20,528	-7,986	-112,182
INTER-FUND DUE FROM {CNI GRANT}	562,427	562,427	0	562,427	0
INTER-FUND DUE FROM {CNP GRANT}	15,794	15,794	0	15,794	0
INTER-FUND DUE FROM {EHV}	1,012,227	996,716	15,511	448,747	563,480
INTER-FUND DUE FROM	2,436,597	2,379,426	57,171	2,520,595	-83,998
TOTAL CURRENT ASSETS	25,185,703	25,579,684	-393,981	25,374,082	-188,379
LAND	8,299,143	8,299,143	0	8,299,143	0
BUILDINGS	158,131,147	158,131,147	0	158,131,147	0
BUILDINGS - COMMERCIAL	400,000	400,000	0	400,000	0
BUILDINGS - ACQUISITION	457,700	457,700	0	457,700	0
BUILDINGS - INELIGIBLE	88,112	88,112	0	88,112	0
BUILDING IMPROVEMENTS	43,595,843	43,368,148	227,695	42,351,958	1,243,884
CONTRACT WORK IN PROCESS	107,925	107,925	0	56,804	51,121
WIP - PREDEVELOPMENT	1,043,873	1,012,093	31,780	480,876	562,997
WIP - INS PROCEEDS/REPAIRS	680,467	669,181	11,285	537,614	142,852
DWELLING EQUIPMENT	3,412,789	3,352,343	60,446	2,957,028	455,761
SITE IMPROVEMENTS	4,962,653	4,962,653	0	4,892,718	69,935
OFFICE EQUIPMENT	238,588	238,588	0	238,588	0
MAINTENANCE EQUIPMENT	365,170	365,170	0	298,320	66,850
COMMUNITY SPACE EQUIPMENT	75,004	75,004	0	75,004	0
COMPUTER EQUIPMENT	527,559	527,559	0	527,559	0
AUTOMOTIVE EQUIPMENT	2,608,074	2,608,074	0	2,418,518	189,556
SECURITY EQUIPMENT	1,183,024	1,183,024	0	1,183,024	0
ACCUM DEPR - BUILDINGS	-151,121,788	-151,054,676	-67,112	-150,359,463	-762,325
ACCUM DEPR - COMMERCIAL	-374,219	-373,916	-303	-371,189	-3,030
ACCUM DEPR - BUILDING ACQUISITION	-450,000	-450,000	0	-450,000	0
ACCUM DEPR - INELIGIBLE BLDG	-79,873	-79,606	-267	-77,203	-2,670
ACCUM DEPR - BUILDING IMPROVEMENTS	-32,857,375	-32,747,761	-109,614	-31,778,814	-1,078,561
ACCUM DEPR - DWELLING EQUIPMENT	-1,854,350	-1,834,635	-19,715	-1,678,448	-175,902
ACCUM DEPR - SITE IMPROVE	-3,354,908	-3,333,414	-21,494	-3,141,710	-213,199
ACCUM DEPR - OFFICE EQUIPMENT	-233,520	-233,230	-290	-228,903	-4,617
ACCUM DEPR - MAINTENANCE EQUIPMENT	-288,686	-287,921	-765	-281,385	-7,301
ACCUM DEPR - COMMUNITY SPACE EQUIPMENT	-75,004	-75,004	0	-75,004	0
ACCUM DEPR - COMPUTER EQUIPMENT	-526,965	-526,930	-35	-524,456	-2,508
ACCUM DEPR - AUTOMOTIVE EQUIPMENT	-2,239,159	-2,220,655	-18,504	-2,045,225	-193,934
ACCUM DEPR - SECURITY EQUIPMENT	-520,724	-510,928	-9,796	-422,768	-97,956
FIXED ASSETS	32,200,500	32,117,189	83,311	31,959,545	240,955
N/R BAYVIEW	208,156	208,156	0	208,156	0
N/R FARNAM	553,079	553,079	0	553,079	0
N/R CROWN I	241,542	241,542	0	241,542	0
N/R CROWN II	161,563	161,563	0	161,563	0
N/R NOAH	893,253	893,253	0	893,253	0
N/R STREHLOW	2,907,673	2,907,673	0	2,907,673	0
N/R KEYSTONE	2,350,000	2,350,000	0	2,350,000	0
NOTES RECEIVABLE	7,315,266	7,315,266	0	7,315,266	0
LT INTER-FUND DUE FROM {HIOOPER}	124,751	124,751	0	124,751	0
LT INTER-FUND DUE FROM {9EC}	826,853	826,853	0	826,853	0
LT INTER-FUND DUE FROM {9KCC}	248,036	248,036	0	248,036	0
LT INTER-FUND DUE FROM {9NOAH}	66,840	66,840	0	66,840	0
LT INTER-FUND DUE FROM {9FAR}	462,869	462,869	0	462,869	0
LT INTER-FUND DUE FROM {9BV}	241,026	241,026	0	241,026	0
LT INTER-FUND DUE FROM {9CR1}	83,438	83,438	0	83,438	0
LT INTER-FUND DUE FROM {9CR2}	121,904	121,904	0	121,904	0
LT INTER-FUND DUE FROM {VILLAS}	214,719	214,719	0	214,719	0
LT INTER-FUND DUE FROM	2,390,435	2,390,435	0	2,390,435	0
A/R P-NOTES - LONG TERM	-665,630	-665,630	0	-665,630	0
TAX CREDIT FEES	71,655	71,655	0	71,655	0
TAX CREDIT FEES	71,655	71,655	0	71,655	0
PREPAID LEASE COSTS	4,640,570	4,640,570	0	4,640,570	0
PREPAID LEASE COSTS	4,640,570	4,640,570	0	4,640,570	0
Leases Receivable	5,916,460	5,916,460	0	5,916,460	0

ACCUMULATED AMORTIZATION	-4,416,383	-4,416,383	0	-4,416,383	0
ACCUMULATED AMORTIZATION	-4,416,383	-4,416,383	0	-4,416,383	0
LT INTER-PROPERTY {9EC}	381,436	381,436	0	381,436	0
LT INTER-PROPERTY {9NOAH}	1	1	0	1	0
LT INTER-PROPERTY {9FAR}	157,612	157,612	0	157,612	0
LT INTER-PROPERTY {9BV}	21,169	21,169	0	21,169	0
LT INTER-PROPERTY {9CR1}	103,467	103,467	0	103,467	0
LT INTER-PROPERTY {9CR2}	22,326	22,326	0	22,326	0
LT INTER-PROPERTY {VILLAS}	227,254	227,254	0	227,254	0
LT INTER-PROPERTY	913,265	913,265	0	913,265	0
INVESTMENT IN JOINT VENTURES	2,296,065	2,296,065	0	2,296,065	0
INVESTMENT IN JOINT VENTURES	2,296,065	2,296,065	0	2,296,065	0
TOTAL NON-CURRENT ASSETS	50,662,203	50,578,892	83,311	50,421,248	240,955
TOTAL ASSETS	75,847,905	76,158,576	-310,671	75,795,330	52,575
LIABILITIES AND EQUITY					
LIABILITIES					
ACCOUNTS PAYABLE					
ACCOUNTS PAYABLE	323,398	242,293	81,105	701,075	-377,677
ACCOUNTS PAYABLE	323,398	242,293	81,105	701,075	-377,677
A/P OTHER	-3,198	-3,198	0	-3,198	0
A/P OTHER	-3,198	-3,198	0	-3,198	0
ACCRUED MGMT & BKKPING FEE	146,296	146,296	0	63,421	82,875
ACCRUED FRONT-LINE FEES	745,682	720,286	25,396	600,951	144,731
ACCRUED FEES	891,978	866,582	25,396	664,372	227,606
ACCR WAGES & WITHHOLDINGS					
COURT ORDERED WITHHOLDING	5	5	0	5	0
STATE WITHHOLDING	-15	-15	0	-15	0
OTHER WITHHOLDING	2,509	2,509	0	1,985	524
ACCRUED PAYROLL	4,613	4,613	0	190,815	-186,202
ACCRUED PAYROLL TAXES	247	247	0	13,396	-13,149
EE INS DEDUCTIONS	8,575	8,603	-28	14,228	-5,653
ACCR WAGES & WITHHOLDINGS	15,933	15,961	-28	220,413	-204,480
ACCRUED INTEREST BRIDGE	798,130	798,130	0	798,130	0
ACCRUED INTEREST HIO	3,212,995	3,212,995	0	3,212,995	0
ACCRUED INTEREST OTHER	690,100	690,100	0	690,100	0
TOTAL ACCRUED INTEREST	4,701,225	4,701,225	0	4,701,225	0
TENANT SECURITY DEPOSIT	671,060	673,368	-2,308	615,954	55,105
PET DEPOSIT	7,205	7,405	-200	7,614	-409
DEPOSIT REFUND ACCOUNT	40,322	40,322	0	165,539	-125,217
TENANT SECURITY DEPOSIT	718,587	721,095	-2,508	789,108	-70,521
DEFERRED REVENUE	4,067,162	4,067,162	0	4,067,162	0
Deferred Revenue - HUD Funds	1,989,902	2,309,759	-319,857	379,969	1,609,933
TENANT PREPAID RENT	320,042	327,907	-7,865	304,199	15,843
NO UNIT HOLDING ACCT	9,474	8,599	875	8,299	1,175
UNEARNED REVENUE	6,386,580	6,713,426	-326,847	4,759,629	1,626,951
MORTGAGE PAYABLE - CURRENT	-40,372	-36,009	-4,363	0	-40,372
CURRENT PORTION OF DEBT	-40,372	-36,009	-4,363	0	-40,372
CURRENT PORTION OF LT DEBT	1,572	1,572	0	1,572	0
OTHER CURRENT LIABILITIES	-213,641	-213,641	0	-213,641	0
CONTRACT RETAINAGE	66,319	66,319	0	66,319	0
OTHER CURRENT LIABILITIES	-147,322	-147,322	0	-147,322	0
A/P OTHER - INTER-PROPERTY	50,000	50,000	0	50,000	0
INTER-PROGRAM PAYABLES	50,000	50,000	0	50,000	0
INTER-FUND DUE TO {COCC}	510,242	472,876	37,366	1,152,753	-642,511
INTER-FUND DUE TO {9EC}	30,583	30,583	0	25,923	4,659
INTER-FUND DUE TO {9KCC}	19,877	19,877	0	39,501	-19,624
INTER-FUND DUE TO {9NOAH}	4,675	4,675	0	4,707	-32
INTER-FUND DUE TO {9SEC}	173,462	173,462	0	173,538	-76
INTER-FUND DUE TO {9FAR}	11,651	11,651	0	17,530	-5,879
INTER-FUND DUE TO {9BV}	10,214	10,214	0	10,547	-334
INTER-FUND DUE TO {9CR1}	4,390	4,390	0	-14,901	19,291
INTER-FUND DUE TO {9CR2}	2,903	2,903	0	2,955	-52
INTER-FUND DUE TO {VILLAS}	-49,174	-49,174	0	-171,079	121,904
INTER-FUND DUE TO {HCV ADM}	621,787	606,026	15,762	74,780	547,007
INTER-FUND DUE TO {PUB HSG}	35,944	31,981	3,962	86,569	-50,625
INTER-FUND DUE TO {ROSS GRANT}	6,426	6,426	0	33,721	-27,296
INTER-FUND DUE TO {FSS GRANT}	11,626	11,545	81	1,825	9,801
INTER-FUND DUE TO {EHV}	914	914	0	1,422	-508
INTER-FUND DUE TO	1,395,519	1,338,348	57,171	1,439,792	-44,273

TOTAL CURRENT LIABILITIES	14,293,898	14,463,972	-170,074	13,176,665	1,117,233
MORTGAGE PAYABLE	1,537,064	1,537,064	0	1,537,064	0
LOAN PAYABLE CDBG	502,000	502,000	0	502,000	0
LOAN PAYABLE OHA	4,924,142	4,924,142	0	4,924,142	0
ACCRUED INTEREST LONG TERM	4,000	4,000	0	4,000	0
ACCR INT L-T CDBG LOAN	64,373	64,373	0	64,373	0
EC, NOAH, Bayview, Farnam Loans	2,625,492	2,625,492	0	2,625,492	0
MORTGAGE-HIO	1,349,569	1,349,569	0	1,349,569	0
MORTGAGE-OHA # 2	539,949	539,949	0	539,949	0
LONG TERM LIABILITIES - OPERATING	324,213	324,213	0	324,213	0
LONG TERM DEBT	11,870,802	11,870,802	0	11,870,802	0
NONCURRENT LIABILITIES - OTHER	0	0	0	0	0
LT LIABILITIES - OTHER	0	0	0	0	0
FSS ESCROW	603,287	621,859	-18,572	574,211	29,076
FSS ESCROW	603,287	621,859	-18,572	574,211	29,076
LT ACCRUED MGMT & BKKPING FEE	792,272	792,272	0	792,272	0
LT ACCRUED FRONT-LINE FEES	100,534	100,534	0	100,534	0
LT ACCRUED FEES	20,458	20,458	0	20,458	0
TOTAL LT ACRUED FEES	913,264	913,264	0	913,264	0
COMPENSATED ABSENCES-LONG TERM	719,815	719,815	0	719,815	0
COMP ABSENCES-LONG TERM	719,815	719,815	0	719,815	0
LT INTER-FUND DUE TO {COCC}	643,500	643,500	0	643,500	0
LT INTER-FUND DUE TO {HIOOPER}	420,241	420,241	0	420,241	0
LT INTER-FUND DUE TO {9EC}	17,565	17,565	0	17,565	0
LT INTER-FUND DUE TO {9KCC}	228,907	228,907	0	228,907	0
LT INTER-FUND DUE TO {9NOAH}	176,615	176,615	0	176,615	0
LT INTER-FUND DUE TO {9FAR}	37,389	37,389	0	37,389	0
LT INTER-FUND DUE TO {9BV}	100,215	100,215	0	100,215	0
LT INTER-FUND DUE TO {9CR1}	257,391	257,391	0	257,391	0
LT INTER-FUND DUE TO {9CR2}	92,233	92,233	0	92,233	0
LT INTER-FUND DUE TO {VILLAS}	416,378	416,378	0	416,378	0
LT INTER-FUND DUE TO	2,390,435	2,390,435	0	2,390,435	0
TOTAL NON-CURRENT LIABILITIES	16,497,603	16,516,174	-18,572	16,468,526	29,076
TOTAL LIABILITIES	30,791,501	30,980,147	-188,646	29,645,192	1,146,309
EQUITY					
CAPITAL ACCOUNT GENERAL PARTNER	1,600,653	1,600,653	0	1,600,653	0
CAPITAL ACCOUNT LIMITED PARTNER	1,808,269	1,808,269	0	1,808,269	0
CAPITAL ACCOUNT SPECIAL LIMITED PARTNER	30	30	0	30	0
NET INVESTED IN CAPITAL ASSETS	24,282,338	24,282,338	0	24,282,338	0
NET INVEST IN CAPITAL ASSETS	27,691,291	27,691,291	0	27,691,291	0
RESTRICTED NET ASSETS	-5,591,846	-5,591,846	0	-5,591,846	0
RETAINED EARNINGS	13,558,611	13,680,636	-122,025	14,652,345	-1,093,734
RETAINED EARNINGS	13,558,611	13,680,636	-122,025	14,652,345	-1,093,734
CONTRA EQUITY	6,821,565	6,821,565	0	6,821,565	0
UNRESTRICTED NET ASSETS	14,720,314	14,720,314	0	14,720,314	0
UNRESTRICTED NET POSITION	7,898,749	7,898,749	0	7,898,749	0
RE - EQUITY TRANSFERS	1,499,600	1,499,600	0	1,499,600	0
RE - EQUITY TRANSFERS	1,499,600	1,499,600	0	1,499,600	0
TOTAL EQUITY	45,056,404	45,178,429	-122,025	46,150,138	-1,093,734
TOTAL LIABILITIES AND EQUITY	75,847,905	76,158,576	-310,671	75,795,330	52,575
TOTAL OF ALL	0	0	0	0	0

Agency-Wide
Budget Comparison

Period = Oct 2024
Book = Accrual ; Tree = ysi_js

	October 2024	PTD		October 2023		YTD	YTD		YTD	
	Actual	Budget	Change	Last Year	Change	2024	Budget	Change	2023	Change
REVENUES	7,673,763	6,609,908	1,063,855	7,115,415	558,348	67,154,289	66,347,334	806,955	65,092,653	2,061,636
EXPENSES	7,795,788	6,659,499	1,136,288	6,642,704	1,153,083	68,248,024	66,851,919	1,396,105	65,017,993	3,230,031
TRANSFERS	0	51,826	51,826	0	0	0	107,355	107,355	0	0
PRIOR PERIOD ADJUSTMENT	0	0	0	52	52	0	0	0	-2,816	-2,816
NET OPERATING INCOME (LOSS)	-122,025	-101,418	-20,607	472,659	-594,684	-1,093,734	-611,939	-481,795	77,476	-1,171,210
ADJUSTED NET OPERATING INCOME (LOSS)	125,870	136,145	-10,275	720,307	-594,437	1,448,268	1,763,669	-315,400	2,686,585	-1,238,316

Budget Comparison

Period = Oct 2024

Book = Accrual ; Tree = ysl_is

	October 2024	PTD		October 2023		YTD	YTD	
	Actual	Budget	Change	Last Year	Change	2024	Budget	Change
REVENUES								
TENANT REVENUES								
DWELLING RENTS	607,423	619,427	-12,004	664,058	-56,635	6,328,519	6,189,909	138,609
DWELLING RENTS SUBSIDY	27,622	30,231	-2,609	36,831	-9,209	354,789	302,311	52,478
TPA - RENT	0	0	0	-65	65	0	0	0
TPA - DAMAGE	0	0	0	0	0	-50	0	-50
LATE FEES	15,580	11,642	3,938	12,615	2,965	167,211	116,690	50,521
LATE FEES {P-NOTES}	0	0	0	0	0	550	0	550
LEGAL FEES	12,783	22,562	-9,779	15,097	-2,314	48,524	225,621	-177,097
MAINTENANCE FEES	17,713	23,329	-5,616	31,070	-13,356	184,687	233,774	-49,086
OTHER TENANT REVENUE	7,870	4,837	3,033	17,899	-10,028	49,618	52,613	-2,995
BAD DEBT RECOVERY	0	0	0	0	0	0	0	0
FRAUD RECOVERY REVENUE	225	300	-75	2,885	-2,660	1,683	3,000	-1,317
TOTAL TENANT REVENUES	689,216	712,328	-23,112	780,389	-91,173	7,135,531	7,123,918	11,613
HUD GRANTS AND SUBSIDY								
REVENUES-HUD SUBSIDY	787,972	786,728	1,245	739,320	48,652	7,844,867	7,867,277	-22,410
HOUSING ASST PAYMENTS	4,475,708	3,463,693	1,012,015	3,233,578	1,242,130	36,846,101	34,636,927	2,209,174
ONGOING ADMIN FEES EARNED	309,867	345,856	-35,989	286,892	22,975	3,041,057	3,458,560	-417,503
REVENUES - HUD CAPITAL - HARD COSTS	285,775	132,594	153,181	261,830	23,944	2,085,261	1,325,935	759,326
REVENUES - HUD CAPITAL - SOFT COSTS	392,589	562,698	-170,109	827,904	-435,315	3,361,782	5,626,980	-2,265,198
TOTAL HUD GRANTS AND SUBSIDY	6,251,911	5,291,568	960,344	5,349,525	902,387	53,179,068	52,915,679	263,390
TOTAL FEE REVENUE								
MANAGEMENT FEE	180,768	150,427	30,340	189,205	-8,437	1,824,669	1,504,273	320,396
BOOKKEEPING FEE	51,053	96,398	-45,345	50,160	893	504,293	963,979	-459,687
FRONT LINE SERVICE FEE	194,080	228,900	-34,820	191,137	2,942	2,005,546	2,289,000	-283,454
FRONT LINE SERVICE FEE {IT}	6,654	7,364	-710	7,365	-711	88,241	73,640	14,601
OTHER FEES FOR SERVICE	2,605	0	2,605	0	2,605	17,089	0	17,089
TOTAL FEE REVENUE	435,159	483,089	-47,930	437,867	-2,708	4,439,837	4,830,892	-391,055
OTHER GOV'T GRANTS/DONATIONS	243,044	58,055	184,989	10,548	232,496	912,173	828,171	84,002
TOTAL OTHER GOV'T GRANTS DONATIONS	243,044	58,055	184,989	10,548	232,496	912,173	828,171	84,002
INVESTMENT INCOME								
INTEREST INCOME - MAIN	2,983	2,925	58	3,142	-158	29,358	29,250	108
TOTAL INTEREST INCOME - MAIN	2,983	2,925	58	3,142	-158	29,358	29,250	108
INTEREST INCOME - OTHER	0	832	-832	0	0	108,043	8,320	99,723
TOTAL NON-CASH INT INCOME {HIO}	0	832	-832	0	0	108,043	8,320	99,723
INTEREST INCOME - RESTRICTED FUNDS	1,167	90	1,077	1,232	-65	12,157	900	11,257
INT INCOME - RESTRICT FUNDS	1,167	90	1,077	1,232	-65	12,157	900	11,257
OTHER INCOME								
NON-DWELLING RENTS	35,113	37,566	-2,454	35,201	-88	360,631	375,663	-15,032
MISCELLANEOUS INCOME	105	110	-5	175	-70	1,388	1,100	288
COMMISION INCOME	6,772	6,638	134	11,501	-4,729	58,207	66,376	-8,168
ADMINISTRATIVE FEES	1,719	40	1,679	929	790	17,472	400	17,072
DONATIONS - GENERAL	352	0	352	502	-150	606	0	606
MISCELLANEOUS GRANT REVENUE	0	0	0	0	0	67,400	0	67,400
DEVELOPERS FEES	0	16,667	-16,667	0	0	544,932	166,667	378,265
GAIN/LOSS ON SALE OF FIXED ASSET	6,222	0	6,222	484,406	-478,183	73,265	0	73,265
INSURANCE PROCEEDS	0	0	0	0	0	214,221	0	214,221
TOTAL OTHER INCOME	50,282	61,020	-10,738	532,713	-482,431	1,338,121	610,205	727,916
TOTAL REVENUES	7,673,763	6,609,908	1,063,855	7,115,415	558,348	67,154,289	66,347,334	806,955
EXPENSES								
OPERATING EXPENSES								
ADMINISTRATIVE EXPENSES								
ADMINISTRATIVE SALARIES								
TOTAL OPERATING ADMINISTRATIVE	0	0	0	31	31	0	0	0
ADMIN SALARIES	546,398	550,893	4,496	500,485	-45,912	5,354,279	5,508,934	154,655
ADMIN CASUAL LABOR	14,611	0	-14,611	0	-14,611	35,361	0	-35,361
ALLOC ADMIN SALARIES	-8,971	16,200	25,171	0	8,971	-147,615	162,000	309,615
TOTAL ADMIN SALARIES	552,038	567,093	15,056	500,516	-51,522	5,242,024	5,670,934	428,910
AUDIT EXPENSE	41,250	7,112	-34,138	0	-41,250	126,480	74,740	-51,741
MANAGEMENT FEE	180,768	156,650	-24,117	189,205	8,437	1,824,669	1,566,504	-258,165
BOOKKEEPING FEE	51,053	96,488	45,435	50,160	-893	504,293	964,876	460,584
NIFA MONITORING FEE	0	394	394	0	0	4,020	5,358	1,338
TOTAL ADMINISTRATIVE FEE	273,070	260,644	-12,426	239,365	-33,705	2,459,461	2,611,477	152,016
ADMIN EMPLOYEE BENEFITS	5,903	5,047	-856	5,282	-621	57,591	51,553	-6,037
ALLOC ADMIN EMP BENEFITS	0	3,450	3,450	0	0	0	34,503	34,503
ER MEDICAL/DENTAL INS - ADMIN	124,518	123,936	-581	116,552	-7,965	1,228,252	1,239,318	11,067
ER PENSION - ADMIN	26,191	31,834	5,642	25,476	-715	149,917	318,336	168,419
ER TAXES-ADMIN	37,822	43,389	5,567	35,867	-1,955	658,323	433,885	-224,438
TOTAL ADMIN EMPLOYEE BENEFITS	194,434	207,656	13,222	183,178	-11,256	2,094,081	2,077,595	-16,486
LEGAL SERVICES - OUTSIDE	30,660	7,244	-23,416	3,293	-27,367	140,119	72,442	-67,678
ALLOC OUTSIDE LEGAL	0	0	0	2,080	2,080	0	0	0
TRAINING/CONFERENCE	614	4,418	3,803	11,719	11,105	85,019	47,375	-37,644
BOARD MEETING/RETREAT	5	0	-5	0	-5	5	0	-5
STAFF MEETING/RETREAT	503	463	-41	220	-283	3,629	4,626	996
TRAVEL	538	2,550	2,012	6,419	5,881	26,353	25,503	-849
MILEAGE	853	615	-238	874	22	7,314	6,148	-1,165
ADMIN VEHICLE - FUEL	0	146	146	0	0	343	1,464	1,121
ADMIN VEHICLE - MTCE & REPAIR	0	310	310	0	0	2,131	3,100	969
ADMIN VEHICLE - LICENSE	0	2	2	0	0	63	20	-43
PUBLICATIONS	0	31	31	0	0	1,295	305	-990
MEMBERSHIPS	15,744	3,111	-12,633	5,621	-10,123	29,809	31,108	1,299
PAYROLL PROCESSING FEE	990	4,843	3,853	5,167	4,177	49,429	48,427	-1,002
TELEPHONE	1,782	7,759	5,976	12,927	11,145	148,011	77,588	-70,422
SAFETY EXPENSE	47	0	-47	0	-47	1,039	0	-1,039

SAFETY EQUIPMENT/SUPPLIES	104	302	198	3,269	3,165	19,031	3,020	-16,011
SAFETY CERTIFICATIONS	0	0	0	0	0	0	0	0
SAFETY TRAINING	0	10	10	0	0	117	100	-17
LEGAL SERVICES - INTERNAL	8,971	612	-8,358	0	-8,971	147,691	6,123	-141,568
ALLOC INTERNAL LEGAL EXP	11,898	12,354	456	11,297	-601	44,457	123,538	79,081
PRINTER SUPPLIES AND EXP	1,458	1,430	-27	1,713	255	18,375	14,304	-4,071
SOFTWARE EXP	339	26,172	25,834	24,696	24,358	205,309	261,723	56,414
FORMS AND PRINTING	0	191	191	0	0	3,005	1,907	-1,098
OFFICE EXPENSE	1,014	183	-831	230	-783	8,554	1,830	-6,724
OFFICE FURNISHINGS	4,037	302	-3,735	0	-4,037	21,892	3,020	-18,872
POSTAGE	8,500	4,217	-4,283	5,933	-2,567	65,234	42,168	-23,066
OFFICE SUPPLIES	3,698	5,253	1,555	4,256	558	48,488	52,527	4,039
OFFICE EQUIPMENT LEASES	2,744	2,393	-351	6,015	3,271	36,002	23,928	-12,074
COMPUTER SUPPLIES	113	117	4	944	830	113	1,170	1,057
COMPUTER EQUIPMENT	32,128	4,391	-27,737	-132	-32,260	100,195	43,906	-56,289
NETWORK COMMUNICATION	10,721	6,821	-3,899	4,146	-6,574	72,348	68,214	-4,134
ADVERTISING /NEWSPAPER ADS	184	166	-18	73	-110	1,478	1,727	249
CABLE TV	0	0	0	246	246	6,011	0	-6,011
EMPLOYEE HIRING & ADMIN EXP	2,612	2,113	-499	778	-1,834	32,011	21,224	-10,787
CONSULTING	11,731	37,308	25,577	16,155	4,424	341,616	381,078	39,462
BANK FEE	1,350	735	-615	-53	-1,403	10,986	6,668	-4,318
SECT 8 PORT OUT ADMIN FEES	2,771	0	-2,771	682	-2,089	23,531	0	-23,531
LATE FEES	951	2	-949	100	-852	59,622	20	-59,602
MISCELLANEOUS EXPENSE	2,633	879	-1,754	58	-2,576	22,301	8,811	-13,490
FEES - PERMITS	184	35	-149	10	-174	2,555	350	-2,205
PROPERTY TAX	0	1,747	1,747	-555	-555	19,368	17,466	-1,903
RENTAL EXPENSE	4,570	1,659	-2,911	916	-3,654	32,651	16,594	-16,057
LAND ACQUISITION EXPENSE	0	31	31	0	0	0	310	310
IT SUPPORT - CONTR SERV	33,200	20,456	-12,744	20,194	-13,005	182,417	204,556	22,138
PROFESSIONAL FEES	0	2,500	2,500	3,125	3,125	1,100	25,000	23,900
PROFESSIONAL/CONTR SERV	0	0	0	0	0	381	0	-381
DEVELOPER'S FEE	0	0	0	0	0	0	0	0
TOTAL OTHER ADMIN EXPENSES	197,648	163,868	-33,779	152,420	-45,228	2,021,399	1,649,387	-372,012
FRONT LINE SERVICE FEES	0	0	0	5,206	5,206	0	0	0
FEE FOR SERVICE	6,654	8,532	1,878	7,365	711	88,241	85,318	-2,924
TOTAL FEE FOR SERVICE	6,654	8,532	1,878	12,571	5,917	88,241	85,318	-2,924
TOTAL ADMINISTRATIVE EXPENSES	1,223,843	1,207,793	-16,050	1,088,049	-135,794	11,905,207	12,094,711	189,504
RESIDENT SERVICES SALARIES								
RESIDENT SERVICES SALARIES	4,149	4,067	-82	3,988	-161	42,566	40,671	-1,895
RESIDENT SERVICE CASUAL LABOR	6,325	7,450	1,125	6,275	-50	64,775	74,500	9,725
TOTAL RESIDENT SERV SALARIES	10,474	11,517	1,043	10,263	-211	107,341	115,171	7,830
RELOCATION EXPENSES	1,267	12,143	10,876	1,793	525	391,227	121,428	-269,799
RELOCATION - SECURITY DEPOSITS	0	0	0	0	0	7,019	0	-7,019
RELOCATION - MOVING EXPENSE	20	357	337	1,287	1,267	5,685	3,572	-2,114
RELOCATION - UTILITY DEPOSITS	0	0	0	0	0	0	0	0
TOTAL RELOCATION EXPENSE	1,287	12,500	11,213	3,079	1,792	403,932	125,000	-278,932
ER MEDICAL/DENTAL INS - RES SERV	1,816	280	-1,536	1,752	-64	18,478	2,800	-15,678
ER PENSION - RES SERV	228	218	-10	219	-9	1,405	2,183	778
ER TAXES-RES SERV	282	324	42	274	-8	4,995	3,237	-1,759
TOTAL RESIDENT SERV EMP BENEFITS	2,326	822	-1,504	2,245	-81	24,878	8,219	-16,659
YOUTH ACTIVITIES	0	0	0	0	0	0	0	0
YOUTH ACTIVITIES - SCHOLARSHIPS	0	0	0	500	500	4,782	0	-4,782
TOTAL YOUTH ACTIVITIES	0	0	0	500	500	4,782	0	-4,782
RESIDENT SERVICES EXPENSE	426	3,206	2,780	1,011	585	806	32,063	31,258
RESIDENT SERVICES EVENTS & ACTIVITIES	278	0	-278	1,724	1,446	13,755	0	-13,755
RESIDENT SERV DIRECT FUNDING	0	0	0	0	0	-130	0	130
RESIDENT FUND - STIPENDS	864	1,767	903	2,630	1,766	33,656	17,665	-15,991
RESIDENT FUND - MEETING EXPENSES	450	183	-267	2,595	2,145	5,777	1,833	-3,944
RESIDENT FUND - OTHER	2,100	0	-2,100	2,438	338	8,551	0	-8,551
TOTAL RESIDENT FUND	4,118	5,156	1,038	10,398	6,280	62,415	51,562	-10,853
FRONT LINE SERVICE FEE	162,830	156,628	-6,203	139,757	-23,074	1,664,468	1,566,279	-98,188
TOTAL FEE FOR SERVICE	162,830	156,628	-6,203	139,757	-23,074	1,664,468	1,566,279	-98,188
TOTAL OTHER RESIDENT SERVICES	181,035	186,623	5,588	166,243	-14,792	2,267,815	1,866,231	-401,584
TOTAL RESIDENT SERVICE EXPENSES	181,035	186,623	5,588	166,243	-14,792	2,267,815	1,866,231	-401,584
UTILITY EXPENSES								
UTILITY - WATER	32,541	42,543	10,002	63,004	30,463	388,383	423,686	35,303
UTILITY - ELECTRIC	132,376	141,335	8,959	132,731	355	1,487,596	1,412,914	-74,682
UTILITY - GAS	18,778	45,955	27,177	23,960	5,182	231,640	459,553	227,913
UTILITY - SEWER	38,945	54,587	15,642	78,380	39,435	497,875	545,868	47,994
ALLOC SEWER	0	88	88	0	0	0	880	880
TOTAL UTILITY EXPENSES	222,640	284,508	61,868	298,075	75,435	2,605,494	2,842,901	237,408
TOTAL MAINTENANCE								
MAINTENANCE SALARIES								
MAINTENANCE SALARIES	227,730	250,799	23,070	224,547	-3,183	2,391,961	2,507,994	116,033
MAINTENANCE CASUAL LABOR	4,870	15,556	10,686	4,488	-382	216,422	155,555	-60,867
ALLOC MAINT SALARIES	0	1,039	1,039	0	0	-45	17,074	17,119
TOTAL MAINTENANCE SALARIES	232,599	267,394	34,794	229,035	-3,564	2,608,338	2,680,623	72,285
APPLIANCES	20,905	17,913	-2,991	20,073	-832	208,040	179,135	-28,906
DWELLING EQUIPMENT	0	0	0	0	0	675	0	-675
PAINT	12,319	7,313	-5,007	6,335	-5,984	74,381	73,126	-1,256
CLEANING SUPPLIES	2,672	3,252	580	1,985	-687	25,739	32,516	6,777
HVAC MATERIALS	3,285	2,709	-576	2,591	-694	31,859	27,091	-4,768
LANDSCAPING MATERIALS	0	401	401	0	0	1,031	4,012	2,981
PLUMBING MATERIALS	21,031	14,629	-6,402	15,345	-5,686	149,159	146,287	-2,872
ELECTRICAL MATERIALS	7,174	2,506	-4,668	1,243	-5,931	58,692	25,060	-33,632
GASOLINE USAGE FOR MAINT VEHICLES	7,601	3,585	-4,016	2,762	-4,839	45,773	35,852	-9,921
MAINTENANCE VEHICLE - LICENSE	0	0	0	8	8	0	0	0
PEST CONTROL SUPPLIES	6,692	1,686	-5,007	757	-5,936	31,362	16,856	-14,506
MAINTENANCE TOOLS	2,698	2,376	-322	25	-2,673	16,755	23,757	7,002
MAINTENANCE MATERIALS	43,847	38,212	-5,635	27,518	-16,330	350,568	382,119	31,552
MAINTENANCE EQUIPMENT	20	677	657	2,649	2,629	3,104	6,768	3,664
Early Pay Discount	0	0	0	-46	-46	-17,590	0	17,590

TOTAL MAINTENANCE MATERIALS	128,245	95,258	-32,987	81,244	-47,001	979,549	952,578	-26,971
ELEVATORS - CONTRACTED SERV	9,970	12,685	2,715	9,241	-729	108,459	126,848	18,389
HVAC - CONTRACTED SERV	15,445	90,825	75,380	76,168	60,723	286,698	908,252	621,554
LAWNS - CONTRACTED SERV	53,510	14,995	-38,515	47,518	-5,992	198,001	356,105	158,104
MATS/UNIFORMS - CONTRACTED SVCE	859	576	-283	480	-379	8,045	5,759	-2,286
PEST CONTROL - CONTRACTED SERV	6,570	0	-6,570	0	-6,570	20,452	0	-20,452
SNOW REMOVAL - CONTRACTED SERV	0	6,516	6,516	0	0	59,828	91,907	32,079
TRASH - CONTRACTED SERV	31,677	19,422	-12,256	19,685	-11,992	319,769	194,216	-125,553
LANDFILL FEES - CONTRACTED SERV	0	457	457	319	319	1,369	4,565	3,196
CLEANING - CONTRACTED SERV	92,182	59,674	-32,507	45,825	-46,357	555,980	596,740	40,760
PAINTING - CONTRACTED SERV	15,879	11,004	-4,875	13,732	-2,147	191,190	110,037	-81,153
ARBORIST - CONTRACTED SERV	13,525	7,994	-5,531	2,805	-10,720	80,170	82,741	2,571
FLOORING REPL - CONTRACTED SERV	77,543	25,326	-52,217	35,487	-42,056	462,880	253,257	-209,623
OUTDOOR CLEANING - CONTRACTED SERV	7,880	33	-7,847	197	-7,683	27,147	326	-26,821
CONCRETE WORK - CONTRACTED SERV	2,075	4,646	2,571	42,432	40,357	7,570	46,458	38,888
ELECTRICAL - CONTRACTED SERV	15,085	10,601	-4,484	48,367	33,282	165,769	106,012	-59,758
LANDSCAPE - CONTRACTED SERV	500	23,096	22,596	34,435	33,935	32,595	230,958	198,363
PLUMBING - CONTRACTED SERV	99,021	21,528	-77,493	11,545	-87,476	299,145	215,280	-83,865
ROOF REPAIRS - CONTRACTED SERV	1,380	48,695	47,315	1,975	595	34,724	486,948	452,224
EXTERIOR REPAIRS - CONTRACTED SERV	27,940	44,037	16,097	33,535	5,595	49,032	440,373	391,342
VEHICLE MAINTENANCE & REPAIR	13,155	4,946	-8,209	5,237	-7,918	52,964	49,463	-3,500
MAINTENANCE EQUIPMENT REPAIR	698	831	133	5,361	4,663	7,527	8,305	778
WINDOWS/DOORS REPL - CONTRACTED SERV	2,358	45,832	43,474	231,449	229,091	174,872	458,316	283,444
VACANT TURNOVER - CONTRACTED SERV	1,980	270	-1,710	0	-1,980	26,776	2,700	-24,076
VACANCY REDUCTION - CONTRACTED SERV	0	0	0	0	0	1,700	0	-1,700
INSPECTIONS - CONTRACTED SERV	8,686	2,594	-6,092	16,460	7,774	24,579	25,937	1,357
INTERIOR REPAIRS - CONTRACTED SERV	28,490	93,147	64,657	25,318	-3,173	433,512	931,473	497,961
Fire Safety - Contracted Services	44,298	12,894	-31,404	14,228	-30,069	287,402	128,937	-158,465
OTHER - OUTSIDE MAINT	0	0	0	0	0	0	0	0
HAZMAT - CONTRACTED SERV	27,277	36,337	9,060	142,005	114,728	473,506	363,369	-110,137
RADON - CONTRACTED SERV	0	0	0	0	0	9,355	0	-9,355
DWELLING/MECHANICAL UPGRADES - CONTR SERV	0	0	0	0	0	974	0	-974
ALLOC INSPECTIONS EXPENSE	2,605	2,173	-432	0	-2,605	17,089	21,733	4,644
TOTAL MAINT SERVICES AND CONTRACTS	600,587	601,131	544	863,802	263,215	4,419,077	6,247,014	1,827,937
MAINTENANCE EMPLOYEE BENEFITS	102	71	-31	-29	-131	112	710	598
ALLOC MAINT EMP BENEFITS	0	-2,663	-2,663	0	0	-19	-26,634	-26,614
ER MED/DENTAL INS - MAINT	53,780	63,394	9,614	60,472	6,693	602,847	633,892	31,046
ER PENSION - MAINT	11,107	13,212	2,105	11,956	849	66,098	132,119	66,021
ER TAXES - MAINT	16,541	17,518	976	16,196	-345	312,982	175,175	-137,807
ER MED/DENTAL INS - GROUND CREW	0	3,700	3,700	0	0	0	37,000	37,000
ER PENSION - GROUND CREW	0	555	555	0	0	0	5,550	5,550
ER TAXES - GROUND CREW	0	10,886	10,886	0	0	0	108,860	108,860
TOTAL MAINT EMPLOYEE BENEFITS	81,530	106,672	25,142	88,595	7,065	982,019	1,066,673	84,654
TOTAL MAINTENANCE EXPENSES	1,042,961	1,070,454	27,493	1,262,675	219,714	8,988,983	10,946,888	1,957,904
PROTECTIVE SERVICE EXPENSES								
PROTECTIVE SERVICE SALARIES								
SECURITY SALARY	19,478	34,000	14,522	19,048	-430	146,002	340,000	193,998
TOTAL PROTECTIVE SERV SALARIES	19,478	34,000	14,522	19,048	-430	146,002	340,000	193,998
FRONT LINE SERVICE FEES	31,249	50,524	19,275	46,175	14,926	341,078	505,242	164,163
TOTAL FEE FOR SERVICE	31,249	50,524	19,275	46,175	14,926	341,078	505,242	164,163
GUARDS - CONTRACTED SECURITY	11,060	0	-11,060	0	-11,060	25,404	0	-25,404
SECURITY & MONITORING	684	1,534	850	22,847	22,163	33,321	15,339	-17,982
SECURITY - CONTRACTED SERV	2,100	4,242	2,142	1,313	-788	19,477	42,417	22,940
SECURITY EQUIPMENT & MATERIALS	50,376	4,343	-46,034	4,343	-46,033	154,008	43,428	-110,580
TOTAL SECURITY EXPENSE	64,220	10,118	-54,102	28,503	-35,717	232,210	101,184	-131,026
ER MEDICAL/DENTAL INS - SECURITY	832	5,000	4,168	4,450	3,619	19,788	50,000	30,212
ER PENSION - SECURITY	639	1,870	1,231	804	164	3,377	18,700	15,323
ER TAXES - SECURITY	1,533	2,720	1,187	1,379	-155	22,174	27,200	5,026
TOTAL SECURITY EMPLOYEE BENEFITS	3,004	9,590	6,586	6,633	3,629	45,339	95,900	50,561
TOTAL PROTECT SERVICE EXPENSES	117,952	104,233	-13,719	100,359	-17,593	764,629	1,042,326	277,697
GENERAL EXPENSES								
INSURANCE EXPENSES								
INSURANCE - LIABILITY	192,166	27,057	-165,109	28,179	-163,986	305,541	270,565	-34,976
INSURANCE - PROPERTY	381,250	64,626	-316,624	69,519	-311,731	714,710	646,257	-68,453
INSURANCE - WORKERS COMP	23,852	23,790	-62	25,058	1,206	220,787	237,901	17,114
TOTAL INSURANCE EXP	597,267	115,472	-481,795	122,757	-474,511	1,241,038	1,154,723	-86,315
BAD DEBT EXPENSE	68,175	20,270	-47,905	42,909	-25,266	506,942	202,699	-304,243
TOTAL BAD DEBT EXPENSE	68,175	20,270	-47,905	42,909	-25,266	506,942	202,699	-304,243
CLOSING COSTS	0	0	0	0	0	126	0	-126
MORTGAGE INTEREST	5,700	0	-5,700	5,477	-224	60,262	0	-60,262
TOTAL LOAN INTEREST	5,700	0	-5,700	5,477	-224	60,262	0	-60,262
TOTAL GENERAL EXPENSES	671,142	135,742	-535,400	171,142	-500,000	1,808,368	1,357,422	-450,946
OTHER EXPENSES								
CASUALTY LOSS								
CASUALTY LOSS PROCEEDS	0	0	0	0	0	68	0	68
NET CASUALTY LOSS	0	0	0	0	0	-68	0	68
TOTAL OTHER EXPENSES	0	0	0	0	0	-68	0	68
TOTAL OPERATING EXPENSES	3,459,574	2,989,354	-470,220	3,086,543	-373,030	28,340,428	30,150,479	1,810,051
NON-OPERATING EXPENSES								
HAP EXPENSES								
HAP EXPENSE	3,843,735	3,250,846	-592,889	3,147,382	-696,353	35,230,656	32,508,462	-2,722,195
HAP EXPENSE - PORTABLE	59,197	38,333	-20,864	16,987	-42,210	454,695	383,333	-71,362
UTILITY REIMBURSEMENT	185,387	143,404	-41,983	144,144	-41,243	1,680,242	1,434,037	-246,205
TOTAL HAP EXPENSES	4,088,319	3,432,583	-655,736	3,308,513	-779,806	37,365,593	34,325,832	-3,039,761
DEPRECIATION EXPENSE	247,895	237,563	-10,332	247,648	-247	2,542,003	2,375,608	-166,395
TOTAL DEPR & AMORT EXPENSE	247,895	237,563	-10,332	247,648	-247	2,542,003	2,375,608	-166,395
TOTAL NON-OPERATING EXPENSES	4,336,214	3,670,146	-666,068	3,556,161	-780,053	39,907,596	36,701,440	-3,206,156
TOTAL EXPENSES	7,795,788	6,659,499	-1,136,288	6,642,704	-1,153,083	68,248,024	66,851,919	-1,396,105
INTERPROJECT EXCESS CASH TRANSFER IN	0	1,439	-1,439	0	0	0	14,393	-14,393
TRANSFERS BET PROGRAMS & PROJECTS - IN	13,723	269,684	-255,961	46,643	-32,920	3,756,204	3,107,748	648,456

TRANSFERS BET PROGRAMS & PROJECTS - OUT	13,723	322,949	309,226	46,643	32,920	3,756,204	3,229,495	-526,709
OPERATING TRANSFER - IN	0	0	0	0	0	24,614	0	24,614
OPERATING TRANSFER - OUT	0	0	0	0	0	24,614	0	-24,614
TOTAL TRANSFERS	0	51,826	51,826	0	0	0	107,355	107,355
PRIOR PERIOD ADJUSTMENT	0	0	0	52	52	0	0	0
TOTAL PRIOR PERIOD ADJUSTMENT	0	0	0	52	52	0	0	0
NET OPERATING INCOME (LOSS)	-122,025	-101,418	-20,607	472,659	-594,684	-1,093,734	-611,939	-481,795
ADJUSTED NET OPERATING INCOME (LOSS)	125,870	136,145	-10,275	720,307	-594,437	1,448,268	1,763,669	-315,400

Public Housing & Capital Funds
Budget Comparison

Period = Oct 2024
Book = Accrual ; Tree = ysl_is

October 2024		PTD	October 2023		YTD	YTD	YTD			
Actual		Budget	Change	Last Year	Change	2024	Budget	Change	2023	Change
REVENUES										
TENANT REVENUES										
TOTAL TENANT REVENUES	594,800	591,034	3,766	647,480	(52,680)	6,121,344	5,910,343	211,001	6,264,778	(143,434)
HUD GRANTS AND SUBSIDY										
TOTAL HUD GRANTS AND SUBSIDY	1,466,336	1,482,019	(15,683)	1,829,055	(362,718)	13,291,910	14,820,192	(1,528,282)	13,685,985	(394,075)
TOTAL OTHER GOV'T GRANTS DONATION	-	-	-	-	-	-	-	-	2,490	(2,490)
INVESTMENT INCOME										
TOTAL INTEREST INCOME - MAIN	2,053	2,925	(872)	2,940	(887)	22,974	29,250	(6,276)	26,145	(3,171)
TOTAL NON-CASH INT INCOME (HIO)	-	832	(832)	-	-	103,548	8,320	95,228	97,724	5,824
INT INCOME - RESTRICT FUNDS	456	-	456	495	(39)	4,843	-	4,843	4,761	82
OTHER INCOME										
TOTAL OTHER INCOME	28,591	38,405	(9,814)	34,461	(5,870)	412,933	384,049	28,884	471,346	(58,413)
TOTAL REVENUES	2,092,236	2,115,215	(22,979)	2,514,430	(422,194)	19,957,552	21,152,154	(1,194,601)	20,553,230	(595,678)
EXPENSES										
OPERATING EXPENSES										
ADMINISTRATIVE EXPENSES	323,221	296,010	(27,211)	304,218	(19,003)	3,123,633	2,970,596	(153,036)	2,930,502	(193,131)
RESIDENT SERVICE EXPENSES	163,429	163,061	(368)	146,106	(17,323)	1,694,050	1,630,613	(63,437)	1,649,875	(44,175)
UTILITY EXPENSES	206,364	273,273	66,909	248,994	42,630	2,437,167	2,732,728	295,561	2,670,117	232,950
MAINTENANCE EXPENSES	896,992	955,907	58,915	1,126,254	229,262	7,850,567	9,758,760	1,908,193	8,279,580	429,013
PROTECT SERVICE EXPENSES	86,361	56,609	(29,752)	69,392	(16,969)	496,583	566,095	69,511	956,391	459,808
GENERAL EXPENSES	636,428	96,343	(540,085)	122,885	(513,543)	1,292,645	963,433	(329,212)	1,215,384	(77,261)
TOTAL OPERATING EXPENSES	2,312,794	1,841,204	(471,591)	2,017,849	(294,945)	16,894,644	18,622,224	1,727,580	17,701,849	807,205
NON-OPERATING EXPENSES										
HAP EXPENSES	20,773	14,820	(5,953)	13,382	(7,391)	158,404	148,201	(10,203)	189,724	31,320
DEPR & AMORT EXPENSE	177,152	159,814	(17,338)	168,357	(8,795)	1,814,860	1,598,136	(216,724)	1,790,946	(23,915)
TOTAL NON-OPERATING EXPENSES	197,925	174,634	(23,291)	181,739	(16,186)	1,973,264	1,746,337	(226,928)	1,980,670	7,406
TOTAL EXPENSES	2,510,719	2,015,837	(494,882)	2,199,588	(311,131)	18,867,909	20,368,561	1,500,652	19,682,519	814,611
TOTAL TRANSFERS	13,723	214,238	200,515	46,643	32,920	2,011,190	1,731,476	(279,715)	574,874	(1,436,316)
TOTAL PRIOR PERIOD ADJUSTMENT	-	-	-	52	52	-	-	-	(1,847)	(1,847)
NET OPERATING INCOME (LOSS)	(432,206)	(114,860)	(317,346)	268,147	(700,353)	(921,547)	(947,883)	26,336	297,683	(1,219,230)
ADJUSTED NET OPERATING INCOME (LOSS)	-255,054	44,954	-300,008	436,504	-691,558	893,314	650,253	243,060	2,088,629	-1,195,315

HIO
Budget Comparison

Period = Oct 2024
Book = Accrual ; Tree = ysl_is

October 2024		PTD	October 2023			YTD	YTD	YTD		
Actual		Budget	Change	Last Year	Change	2024	Budget	Change	2023	Change
REVENUES										
TENANT REVENUES										
TOTAL TENANT REVENUES	82,683	102,766	-20,083	121,612	-38,929	961,473	1,028,295	-66,822	1,156,249	-194,775
TOTAL OTHER GOV'T GRANTS DONATION	0	0	0	0	0	0	0	0	1,010	-1,010
INT INCOME - RESTRICT FUNDS	711	90	621	737	-26	7,314	900	6,414	5,865	1,449
OTHER INCOME										
TOTAL OTHER INCOME	19,712	14,132	5,580	12,313	7,399	127,247	141,323	-14,075	119,217	8,030
TOTAL REVENUES	103,105	116,988	-13,883	134,662	-31,557	1,096,034	1,170,518	-74,483	1,282,341	-186,306
EXPENSES										
OPERATING EXPENSES										
ADMINISTRATIVE EXPENSES	28,584	38,856	10,272	27,276	-1,308	287,984	391,053	103,069	353,964	65,980
RESIDENT SERVICE EXPENSES	14,674	18,253	3,578	12,059	-2,615	139,771	182,525	42,754	128,544	-11,227
UTILITY EXPENSES	12,608	11,224	-1,385	36,301	23,693	124,966	110,054	-14,912	120,946	-4,021
MAINTENANCE EXPENSES	109,108	77,411	-31,697	82,534	-26,574	767,903	816,767	48,863	800,943	33,040
PROTECT SERVICE EXPENSES	9,109	2,549	-6,559	3,660	-5,449	64,543	25,492	-39,051	50,825	-13,718
GENERAL EXPENSES	-7,589	19,322	26,911	21,346	28,935	259,932	193,216	-66,716	289,644	29,712
OTHER EXPENSES	0	0	0	0	0	-68	0	68	0	68
TOTAL OPERATING EXPENSES	166,495	167,614	1,119	183,177	16,682	1,645,032	1,719,106	74,074	1,744,866	99,834
NON-OPERATING EXPENSES										
HAP EXPENSES	8,185	4,067	-4,118	2,993	-5,192	45,387	40,675	-4,712	40,468	-4,919
DEPR & AMORT EXPENSE	56,946	75,312	18,366	58,673	1,727	575,996	753,120	177,124	616,976	40,980
TOTAL NON-OPERATING EXPENSES	65,131	79,379	14,249	61,666	-3,465	621,383	793,795	172,412	657,444	36,061
TOTAL EXPENSES	231,626	246,993	15,368	244,843	13,217	2,266,414	2,512,901	246,486	2,402,310	135,895
TOTAL TRANSFERS	-13,723	-102,635	-88,912	-46,643	-32,920	-550,870	-1,026,351	-475,481	-574,874	-24,004
TOTAL PRIOR PERIOD ADJUSTMENT	0	0	0	0	0	0	0	0	-969	-969
NET OPERATING INCOME (LOSS)	-114,797	-27,370	-87,427	-63,538	-51,259	-619,510	-316,032	-303,478	-544,126	-75,384
ADJUSTED NET OPERATING INCOME (LOSS)	-57,851	47,942	-105,793	-4,865	-52,987	-43,514	437,088	-480,602	72,850	-116,364

Housing Choice Voucher (Section 8)
Budget Comparison

Period = Oct 2024
Book = Accrual ; Tree = ysi_js

	October 2024	PTD		October 2023		YTD	YTD		YTD	
	Actual	Budget	Change	Last Year	Change	2024	Budget	Change	2023	Change
REVENUES										
TENANT REVENUES										
TOTAL TENANT REVENUES	150	200	-50	0	150	1,830	2,000	-170	4,219	-2,389
HUD GRANTS AND SUBSIDY										
TOTAL HUD GRANTS AND SUBSIDY	4,498,574	3,607,151	891,423	3,308,349	1,190,225	38,063,260	36,071,507	1,991,753	34,861,661	3,201,599
TOTAL FEE REVENUE										
TOTAL FEE REVENUE	2,605	0	2,605	0	2,605	17,089	0	17,089	0	17,089
TOTAL NON-CASH INT INCOME {HIO}	0	0	0	0	0	442	0	442	304	138
OTHER INCOME										
TOTAL OTHER INCOME	0	40	-40	-126	126	0	400	-400	379	-379
TOTAL REVENUES	4,501,329	3,607,391	893,938	3,308,223	1,193,106	38,082,621	36,073,907	2,008,715	34,866,563	3,216,058
EXPENSES										
OPERATING EXPENSES										
ADMINISTRATIVE EXPENSES	248,425	234,346	-14,079	239,103	-9,322	2,466,465	2,343,463	-123,001	2,574,551	108,087
RESIDENT SERVICE EXPENSES	2,435	119	-2,316	929	-1,505	5,574	1,190	-4,384	9,395	3,821
UTILITY EXPENSES	0	0	0	0	0	0	0	0	-22	-22
MAINTENANCE EXPENSES	18,004	24,727	6,723	24,135	6,131	221,887	247,270	25,383	240,424	18,537
PROTECT SERVICE EXPENSES	0	0	0	0	0	0	0	0	0	0
GENERAL EXPENSES	6,431	4,408	-2,023	4,667	-1,764	40,745	44,080	3,335	43,685	2,940
TOTAL OPERATING EXPENSES	275,295	263,600	-11,695	268,835	-6,460	2,734,671	2,636,003	-98,667	2,868,034	133,364
NON-OPERATING EXPENSES										
HAP EXPENSES	3,878,888	3,221,416	-657,472	3,121,174	-757,714	35,293,995	32,214,157	-3,079,838	30,938,944	-4,355,050
DEPR & AMORT EXPENSE	713	1,303	590	1,293	579	12,346	13,030	684	12,925	579
TOTAL NON-OPERATING EXPENSES	3,879,601	3,222,719	-656,882	3,122,467	-757,135	35,306,341	32,227,187	-3,079,154	30,951,870	-4,354,471
TOTAL EXPENSES	4,154,896	3,486,319	-668,577	3,391,301	-763,595	38,041,011	34,863,190	-3,177,821	33,819,904	-4,221,108
NET OPERATING INCOME (LOSS)	346,433	121,072	225,361	-83,079	429,512	41,610	1,210,717	-1,169,107	1,046,659	-1,005,049
ADJUSTED NET OPERATING INCOME (LO	347,146	122,375	224,772	-81,786	428,933	53,956	1,223,747	-1,169,791	1,059,584	-1,005,628

COCC
Budget Comparison

Period = Oct 2024
Book = Accrual ; Tree = ysl_is

October 2024		PTD	October 2023			YTD	YTD	YTD		
Actual		Budget	Change	Last Year	Change	2024	Budget	Change	2023	Change
REVENUES										
TENANT REVENUES										
TOTAL TENANT REVENUES	11,583	18,228	(6,645)	11,297	286	50,884	182,280	(131,396)	181,972	(131,088)
HUD GRANTS AND SUBSIDY										
TOTAL HUD GRANTS AND SUBSIDY	-	-	-	-	-	-	-	-	-	-
TOTAL FEE REVENUE										
TOTAL FEE REVENUE	432,554	479,715	(47,161)	437,867	(5,313)	4,422,748	4,797,152	(374,403)	4,445,824	(23,076)
TOTAL OTHER GOV'T GRANTS DONATION	178,149	-	178,149	-	178,149	178,149	247,620	(69,471)	657,678	(479,530)
INVESTMENT INCOME										
TOTAL INTEREST INCOME - MAIN	33	-	33	36	(2)	331	-	331	342	(11)
TOTAL NON-CASH INT INCOME {HIO}	-	-	-	-	-	4,053	-	4,053	3,724	328
OTHER INCOME										
TOTAL OTHER INCOME	(91)	8,443	(8,535)	484,508	(484,600)	234,932	84,433	150,498	537,554	(302,623)
TOTAL REVENUES	622,227	506,387	115,841	933,708	(311,481)	4,891,096	5,311,485	(420,389)	5,827,094	(935,999)
EXPENSES										
OPERATING EXPENSES										
ADMINISTRATIVE EXPENSES	540,842	586,423	45,582	462,904	(77,938)	5,205,662	5,868,020	662,358	5,090,755	(114,907)
RESIDENT SERVICE EXPENSES	128	5,178	5,050	2,789	2,661	390,829	51,783	(339,045)	176,549	(214,279)
UTILITY EXPENSES	3,668	12	(3,656)	12,780	9,112	43,361	120	(43,241)	47,916	4,555
MAINTENANCE EXPENSES	16,388	10,239	(6,148)	29,101	12,714	130,652	102,391	(28,262)	268,092	137,440
PROTECT SERVICE EXPENSES	22,482	45,041	22,559	27,118	4,636	203,503	450,410	246,907	329,230	125,728
GENERAL EXPENSES	34,425	14,210	(20,215)	21,106	(13,319)	203,921	142,100	(61,821)	226,254	22,333
TOTAL OPERATING EXPENSES	617,933	661,104	43,171	555,799	(62,134)	6,177,928	6,614,824	436,897	6,138,797	(39,131)
NON-OPERATING EXPENSES										
DEPR & AMORT EXPENSE	13,023	1,134	(11,889)	19,265	6,242	138,189	11,322	(126,867)	187,650	49,461
TOTAL NON-OPERATING EXPENSES	13,023	1,134	(11,889)	19,265	6,242	138,189	11,322	(126,867)	187,650	49,461
TOTAL EXPENSES	630,956	662,238	31,282	575,063	(55,892)	6,316,116	6,626,146	310,030	6,326,447	10,331
TOTAL TRANSFERS	-	(59,777)	(59,777)	-	-	(1,460,321)	(597,770)	862,551	-	1,460,321
NET OPERATING INCOME (LOSS)	(8,728)	(96,074)	87,346	358,645	(367,373)	35,300	(716,891)	752,191	(499,352)	534,653
ADJUSTED NET OPERATING INCOME (LOSS)	4,294	-94,940	99,235	377,909	-373,615	173,489	-705,569	879,058	-311,702	485,191

Omaha Housing Authority

2025 Budget Narrative

Revenue

- PH Operating Subsidy based on 2025 initial budget submissions to HUD (under review at HUD). Most AMPs are projecting a lower operating subsidy in 2025 vs. 2024 due to lower utilities in the current reference period and a much lower inflation factor than in recent previous years.
- Due to asset repositioning, several AMPs are slated to receive less operating subsidy & tenant rent than during 2024. See Asset Repositioning Effects for a detailed review.
- Assumed tenant rent equal to 2024 annualized except in cases of demolition or disposition.
- Projected River City Developer's Fees to increase 20% over 2024; non-payroll expenses increasing correspondingly.
- No gain/loss budgeted for sale of scattered site homes.
- Capital Funds – only soft cost (revenue) & corresponding soft cost expense are budgeted; hard costs get capitalized on each property's balance sheet.
- HCV programs are based off recent Two-Year Tool & projected shortfall.

Expenses

- OHA averages thirteen open positions at any given time; for budgetary purposes six open positions assumed at any given time.
- 3% increase in compensation effective 1-1-2025.
- Facilities Operations Manager replaced with COO (projected increase \$63k/year).
- Medical insurance premiums projected 9% increase with OHA bearing burden of entire increase.
- Assumed 100% staffing at sold & demolished locations; normal attrition will allow us to shift staff as needed.
- Removed pro-rata portion of all other expenses at sold & demolished locations.
- HCV 100% staffed. Will reevaluate as needed.
- Used a 3% inflationary increase on non-payroll & benefits operating expenses.

Projected Adjusted Net Operating Income: \$26,742

COCC Projected Adjusted Net Operating Income: \$196,671

PH & Capital Funds Projected Adjusted Net Operating Loss: \$165,870

Housing Choice Voucher Projected Adjusted Net Operating Loss: \$4,059

Omaha Housing Authority

Asset Repositioning Effects

2025

Property	Projected Operating Subsidy Increase / (Decrease) over 2024 *	Projected Increase in Project-Based Voucher (PBV) Revenue	Projected Tenant Rent Decrease over 2024	Total Increase / (Decrease)	2025 Activity	Projected Transition Date
Southside	(630,815)	n/a	(591,580)	(1,222,395)	76 PH units offline beginning 5-1-2024, no vacancies being re-rented	in process
Spencer	(163,776)	n/a	n/a	(163,776)	Asset Repositioning Fee (ARF) ends 12-31-2025	complete
Timbercreek	(52,186)	n/a	n/a	(52,186)	Asset Repositioning Fee (ARF) ends 6-30-2025	complete
Chambers - sale of property **	(13,132)	n/a	(177,619)	(190,751)	sale of 32 PH units & 38 tax credit units	6/29/2025
NOAH - PBV conversion ***	(4,225)	130,259	n/a	126,035	19 units PBV; 5 to remain PH stock	4/1/2025
16 SCNE - Sale of units & PBV conversion ***	(92,668)	419,522	(54,497)	272,357	115 units PBV; 28 units sold	7/1/2025
18 SCNW - Sale of units & PBV conversion ***	(18,935)	146,385	(26,140)	101,310	66 units PBV; 10 units sold	sale of units by 7/1/2025; PBV conversion by 10/1/2025
17 SCSE - Sale of units ***	(33,944)	n/a	(47,898)	(81,842)	22 units sold	7/1/2025
Total Increase / (Decrease)	(1,009,681)	696,166	(897,734)	(1,211,248)		

* not reflective of any changes in projected OpSub for 2025 vs. 2024 via the 52723 submissions; only changes due to asset repositioning are reflected above

** Chambers will receive OpSub 75% year 1 / 50% year 2 / 25% year 3

*** PBV conversions & partial sales receive 75% of operating subsidy year 1; 50% year 2

7.7. Development

Memorandum



To: OHA Board of Commissioners

From: Brian Hansen, General Counsel

Date: December 19, 2024

Re: Development Report

Choice Neighborhoods Implementation Grant – Spencer Homes

Construction of Malcom's Place is progressing on schedule. Building plans are on file with OHA staff and available upon request. Staff have been coordinating with Spencer tenants who are interested in returning and tenants have started moving into units as they are completed.

MLK Square is on schedule for a Summer/Fall 2025 completion date. This is the final phase of the North CNI and will consist of 39 units in a four story building. Retail bays will front 30th Street and parking for residents will be available on the west side.

Choice Neighborhood Implementation Grant – Southside

Construction has begun on the first phase of the Southside Terrace redevelopment. The two public housing buildings on the site have been demolished and foundations are being constructed. This phase will consist of a 92 unit multi-family building.

Design work for SST Phase 2 is being finalized. Phase 2 is a 4% LIHTC development that will consist of 115 units in a mix of townhouses and a multi-family building. Closing is anticipated to occur in February 2025. Current plans are available upon request.

Design work for 3030 Upland Parkway is progressing. This will be a 74 unit development consisting of a 71 unit multifamily building and a three unit townhome development. Closing will occur in 2025.

Y Street Townhomes will be a partnership between Brinshore, Canopy South and OHA. The development will consist of 14 townhome units. Closing is anticipated for first quarter of 2025.

Design work for Arbor Flats has continued after a delay due to a revision in the flood map and failed LIHTC application. OHA expects to have an update on timing of this project in the coming months.

LRK & Associates has been selected as the architect for Phase 3 and design work has started. A 4% LIHTC application will be submitted in December 2024.

Scattered Site Housing

OHA staff is continuing to work toward repositioning all scattered site single family houses through PBV, RAD PBV, or Section 18 Disposition.

Applications for conversion and disposition have been submitted to HUD. After HUD approves the application to convert units out of the public housing program and into the Section 8 program, the houses will be sold to OHA's controlled affiliate, River City Housing.

Tower Repositioning Planning

Planning for renovation and preservation for OHA's public housing towers through a variety of HUD redevelopment tools has started with OHA's RAD consultant, AH Forward, and development partner, Brinshore. OHA staff intends to present the board with a master development agreement with Brinshore for the tower work in the coming months.

A resolution for RAD conversion of Pine Tower is before the Board this month.

7.8. Procurement/Contracting/Capital Budgets

Memorandum



To: The OHA Board of Commissioners
From: Jennifer Dexter, Procurement Manager
Date: December 19, 2024
Re: Procurement Report for December 2024

Current Procurement Activity

Project	Type	Budget	Action Stage	Anticipated Board Month
Independent Professional Audit	RFP	TBD	Published	January
Title, Escrow & Related Services	RFP	TBD	Published	January
Residential Relocation	Renewal	\$2,500,000	Awaiting Board Approval	December
Fire Safety & Suppression	Renewal	\$310,000	Awaiting Board Approval	December
Commercial HVAC	Renewal	\$550,000	Awaiting Board Approval	December

Contracts Executed – Approved by Previous Board Action

Vendor	Project	Contract Amount	MBE/WBE Section 3
Hooper Heating & Cooling	Residential HVAC	\$300,000	Section 3
A-1 United Heating & Air	Residential HVAC	\$300,000	MBE
Eyman Plumbing, Inc.	Residential HVAC	\$300,000	MBE
Gazella Bright, LLC	Custodial	\$600,000	MBE/DBE
JC-Just Clean	Custodial	\$600,000	MBE/DBE
LEO A DALY	Site Drainage	\$135,000	None
Spencer Fane LLP	Legal	\$100,000	None
Goosmann Law Firm	Legal	\$100,000	None
Welch Law Firm, P.C.	Legal	\$100,000	None
Kone, Inc	Elevator	\$500,000	None
Meco-Henne Contracting	Tower Window Replacement	\$3,154,000	None
Elkhorn West Construction	Tower Sewer Stack Replacement	\$6,645,000	None
Inteconnex	Key Management Systems	\$170,000	None

Procurements Executed – over \$30,000

Vendor	Project	Project Amount	MBE/WBE Section 3

Projects over \$50,000 Commencing Utilizing Previously Approved Contracted Services

Vendor	Project	Contract Utilized	Project Amount	MBE/WBE Section 3

Capital Improvements Monthly Report – December 2024

- **Grant obligations** – With the signed contract for Jackson Tower plumbing stack replacement, timely obligation of the 2022 ARTS and 2023 Formula grants appears imminent. The contract effective date is December 16th, after which we will issue a purchase order and complete the obligation in HUD's system.
- **2025-2029 CFP Five Year Action Plan** – OHA solicited feedback on the completed draft from tenants and the public. The proposed plan will be before the full OHA board in December, then go to HUD for approval.

Capital Funds Project Status update as of 12/06/2024

Project	Comments
<u>RECENTLY COMPLETED</u>	
Tower lobby renovation A&E	Completed November 2024
Jackston Tower freeze damage repairs	Completed November 2024
Jackson Tower paving	Completed November 2024
SFH windows	Completed November 2024
<u>IN PROGRESS</u>	
Cherry Tree entry door replacement	Estimated completion January 2025
SCNE/SCNW lead hazard repairs	Estimated completion February 2025
Site drainage A&E	Estimated completion February 2025
Code/safety updates (GFCI, detectors)	Estimated completion February 2025
Key management system	Estimated completion Spring 2025
Park South, Jackson boiler rebuilds	Pending supply chain issues, estimated completion Spring 2025
Lead risk assessments	All public housing, will continue through mid-2025
Kay Jay Tower shower replacements	Estimated completion Fall 2025
Tower plumbing stack replacements	Estimated completion early 2026
Tower window replacement	Estimated completion early 2026
<u>IN DEVELOPMENT</u>	
Physical needs assessment / Energy Audit	Planning solicitation - must be done every five years
Fire alarm panel replacements	Re-initiating solicitation due to inadequate bid responses
Multifamily exterior repairs	Developing solicitation scope based on completed A&E
Tower lobby renovations	Developing solicitation scope based on completed A&E

Capital Funds Grant Status Update as of 10/28/2024

ACTIVE GRANTS

Grant Year	Grant Type	Award Amount	Award Date	Obligation Date	End Date	\$ Expended	% Expended	\$ Obligated	% Obligated	Status
2019	Lead Based Paint	\$660,000	8/30/2019	8/30/2023	8/30/2025	\$630,220	95.49%	\$642,987	97.42%	Obligation complete, expending
2020	Formula	\$6,017,802	3/26/2020	3/25/2024	3/25/2026	\$5,969,940	99.20%	\$5,996,397	99.64%	Obligation complete, expending
2022	Formula	\$7,114,398	5/12/2022	5/11/2024	5/11/2026	\$6,521,681	91.67%	\$7,475,454	105.08%	Obligation complete, expending
2022	JT At Risk	\$2,145,000	2/8/2023	1/29/2025	1/29/2027	\$36,577	1.71%	\$60,095	2.80%	Need to obligate by 2024 EOY
2023	Formula	\$7,173,205	2/17/2023	2/16/2025	2/16/2027	\$3,094,746	43.14%	\$4,702,872	65.56%	Need to obligate by 2024 EOY
2024	Formula	\$7,433,097	5/6/2024	5/6/2026	5/6/2028	\$2,653,309	35.70%	\$2,683,767	36.11%	Obligation in progress

INACTIVE GRANTS (NO CHANGE)

Grant Year	Grant Type	Award Amount	Award Date	Obligation Date	End Date	\$ Expended	% Expended	\$ Obligated	% Obligated	Status
2019	Formula	\$5,612,511	4/16/2019	4/15/2023	4/15/2025	\$5,612,511	100.00%	\$5,612,511	100.00%	Closing process in progress
2020	Safety & Security	\$227,273	4/2/2021	4/1/2022	4/1/2023	\$227,273	100.00%	\$227,273	100.00%	Fully expended, ready to close
2021	Formula	\$5,831,495	2/23/2021	2/22/2023	2/22/2025	\$5,831,495	100.00%	\$5,831,495	100.00%	Fully expended, ready to close
2021	Safety & Security	\$247,000	9/1/2021	9/9/2022	9/9/2023	\$146,530	59.32%	\$146,530	59.32%	Fully expended, ready to close

7.9. Human Resources

Memorandum



To: The Board of Commissioners

From: Latina Jackson, Director of Human Resources

Date: December 5, 2024

Re: Staffing Report Summary October 23, 2024 – December 4, 2024

Total Open Positions 8

Position(s)	Number of Positions Open	Department	Status
Assistant Property Manager	1	Property Management	Interviewing
Property Manager	1	Property Management	Interviewing
Housing Inspector	1	Inspections	Interviewing
Maintenance Manager	1	Property Management	Checking References
Senior Accountant	1	Finance	Interviewing
Public Safety Officer – PT	1	Public Safety	Interviewing
Public Safety Dispatcher – PT	1	Public Safety	Interviewing
Housing Compliance Specialist	1	Compliance	Interviewing

Total New Hires 13

Title	Number of Positions Filled	Department/Location
Maintenance Repairer	5	Property Management
Assistant Property Manager	1	Property Management
Case Manager – Intensive Services	1	Family and Community Services
Housing Clerk – PHI	1	Public Housing Intake
Pest Control Technician	1	Property Management
Property Manager	1	Property Management
Chief Operating Officer	1	Executive
Housing Specialist – Waitlist	1	Housing Choice Voucher
Public Safety Officer – PT	1	Public Safety

Total Transfers 0

Name	Old Title	New Title	Department	Date

Total Promotions 1

Name	Old Title	New Title	Department	Date
Adan Herrera	Maintenance Manager	Painter	Property Management	TBD

Type of Termination	Number of Employees
Involuntary	3
Voluntary	5

Current Monthly Turnover Rate
4.85%

Annual Turnover Rate (12/2023 – 11/2024)
43.03%

7.10. Family and Community Services

Family and Community Services Department

Synergy of Services = Self-Sufficiency

Outreach

Academic Achievement

Transportation

Elderly and Disabled Services

Resident Education and Employment

Family Self-Sufficiency

Homeownership

Grants



Families Towards Self-Sufficiency

Family and Community Services Department

Family Services and Community Outreach (FSCO) Program

Goal: The primary goal of the Family Services and Community Outreach Program is to assess, upon lease-up, the needs of public housing residents and strategically connect them to community resources and internal OHA programs that stabilize their housing situations; provide access to education and employment opportunities and offer youth tutoring and mentoring as well as quality services that allow older people to age-in-place. Additionally, the FSCO Program assists the overall agency with the collection of non-payments of rent through referral resources; enhanced public safety through resident mediation; formal and informal HCV and Public Housing hearings; incentive transfer; and the development of the Community Service/Section 3 Resident program, Resident Associations, and the Central Advisory Committee.

Snapshot of Services/Referrals	The Impact (Households served)
Home Visits	102
Study Centers (Youth & Adult)/Computer Lab (SST and TSF)	300+
Outreach Efforts	300+
Educational Opportunities (ABE/GED/ESL/Translation services) Adult	42
Employment Referrals (Job Readiness/Employment Leads/Job Placement)	100+
Youth/Adult (Cultural/Recreational/Educational)	100+
Transportation to all activities	200+
Intra-Agency Service Coordination & Support	26
Number of New Enrollment (Case management)	9
Number of New Community Partnerships	7
Number of Cultural/Recreational Activities (Soccer training)	15
Referral to FSS/HOP	5
Food/Nutrition Program (TSF food program)	500+
Service Coordination with Property Management	29

Residents' Opportunity for Self-Sufficiency (ROSS) Program:

The Resident Opportunity for Self-Sufficiency (ROSS) Program is designed to help adults and youth living in public housing set and achieve goals related to economic self-sufficiency. The program is broken down into a set of purposes related to the following:

- Education
- Employment and Job Training
- Health/Wellness

The program is self-directed and self-paced. The ROSS coordinator will collaborate with participants to access these resources. This program will best serve those who are initiative-taking and genuinely interested in improving their current situation.

Family and Community Services Department

Purpose: To provide case management services to residents living within Omaha Housing Authority communities that focus on strengthening the family and promoting self-sufficiency through supportive services and referrals to community partners.

Snapshot of Services/Referrals	The Impact (Households served)
Caseload to Date	171
New Enrollments	10
TANF Recipients	0
Face-to-Face Contact Visit	60
Virtual Contact Visit	15
Phone Visit	30
ROSS Employment Goals	20
Job Placement	15
Employed Full-Time	60
Employed Part-Time	25
Employment Referrals	30
Education Goals	0
Education Goals Met	100 MCC/UNO
Education Referrals	15
College Enrollment	2
Healthcare Coverage	70
Program Coordination Committee (PCC)	25
New PCC Partners	8

Resident Education and Employment Program (REEP)

Goal: The primary goal of the Resident Education and Employment Program (REEP) is to provide meaningful opportunities for Public Housing and Section 8 residents to receive job readiness training, soft and life skill development, post-secondary education, GED/ABE/ESL, job search assistance, and resume preparation. By connecting residents with Metro-area employers, REEP seeks employment opportunities that lead to economic self-sufficiency.

Snapshot of Service Coordination	The Impact (Households served)
Job Placement (DED-Internship through TSF)	42
Job Readiness Training/Referral and Job Fair	100
Direct Employment Leads/Flyers	300
Post-Secondary Education (Certificate Programs/2/4-year University)	179

Family and Community Services Department

Family Self-Sufficiency Program (HCV/PH) (FSS)

Goal: The primary goal of the Family Self-Sufficiency Program is to empower families to become economically self-sufficient. Through intensive case management services, financial literacy counseling, asset development, life skills workshops, goal planning (ITSP), and strategic service coordination through the Program Coordinating Committee (PCC), residents have the skills necessary to live and lead self-sufficient lives.

Snapshot of Service Coordination	The Impact (Households served)
Intensive One-on-One Case Management (HCV & PH)	HCV-153 PH-29
TANF Recipients (Welfare to Work)	HCV-0 PH-1
Recommendation for Graduation	HCV-3 PH-0
Recommendation for Termination	HCV-1 PH-0
Program graduates	HCV-3 H-0
New Enrollment	HCV-3 PH-3
Employment/Job Training/Referrals (YTD)	180
Post-Secondary Education (YTD)	50
Employed full-time (YTD)	HCV-116 PH-18
Financial Literacy (Financial Management & Homeownership Counseling) (YTD)	70
Asset Development (Escrows)	HCV-\$504,574.00 PH-\$72,620.00 Total-\$577,194.00. Forfeiture Total-\$57,892.00
Life Skills	80
Service Coordination (PCC)	35
In-Person Meetings	40

How do We Impact OHA and the Community?

ACHIEVEMENTS:

- *One tenant was pre-approved for a home mortgage loan this month.*
- *One tenant signed purchase agreements, and their offers were accepted.*
- *One FSS/SST participant closed on a home using their Section Voucher.*
- *Three FSS participants graduated this month for a total amount of escrow of \$30,776.*
- *Three FSS participants were recommended for graduation this month for a total escrow amount of \$20,125.*

Board Report

Family and Community Services Department

- *For the month of September, 49 HCV (\$19,031 includes interest) and 11 PH FSS (\$2,829.38 includes interest) residents are accumulating escrow deposits.*
- *Three PH FSS participants moved to HCV.*
- *Four HCV/PH tenants enrolled in the FSS program this month.*
- *Staff participated in HUD Coaching Mindset in Tough Money Training.*
- *Partnership with Methodist College Mobile Clinic to provide free Flu Vaccination at all the towers.*
- *New partnership with Goodwill to provide a variety of workshops, training, Certification programs, and classes throughout OHA towers.*
- *Currently, 25 OHA tenants are still enrolled in either Career Forward or Spring classes at MCC. This partnership continues to solidify our relationship with MCC as we pipeline FSS participants and OHA residents into career-centered educational opportunities. The program allows participants to earn college credit toward a degree program of their choice while earning an hourly stipend for time spent in the classroom. Support also includes an MCC-assigned coach, scholarship opportunities, and other benefits.*
- *Staff is creating and maintaining a master list of community resources my participants frequently ask for, including food pantries, mental health care, and utility assistance.*
- *For the month of Sept, 52 HCV (\$19,682.83 includes interest) and 13 PH (\$3,595.91 includes interest) residents are accumulating escrow deposits.*
- *FSS Staff participated in HUD FSS office hours.*
- *Continue to build a working relationship with Creighton University's TRIO Program for Adults working.*
- *Coordinators working with HWS to better serve OHA tenants through employment and other job training skills such as interview skills, resume workshops, and career exploration.*
- *Staff are continuously working with Metro Community College: Firming details for our Career Forward cohort. This partnership continues to solidify our relationship with MCC as we pipeline FSS participants and OHA residents into career-centered educational opportunities. The program allows participants to earn college credit toward a degree program of their choice while earning an hourly stipend for time spent in the classroom. Support also includes an MCC-assigned coach, scholarship opportunities, and other benefits.*
- *Partnership with Simple Foundation: Strengthen our partnership with TSF and secure opportunities for resident youth, from afterschool and summer programming to paid internship opportunities.*
- *REACH-Partnership with Creighton University Center for Promoting Health and Health Equalities to address four areas of focus: Vaccination, Physical Activities, Breastfeeding, and Nutrition. CHW completed three weeks of training courses. Five tenants have been selected as the OHA CHW.*
- *Staff continue to meet with the Simple Foundation to strengthen our partnership with TSF and secure opportunities for resident youth, from afterschool and summer programming to paid internship opportunities.*
- *Novel Care- Home healthcare services- Provides professional and paraprofessional healthcare services to tenants where they are most comfortable, their homes. This company assists with companion services, light housekeeping, transportation, and personal care, and it has a nurse on staff to help with medical questions. They are Medicare and Medicaid certified and part of a network of multiple private insurance companies. This month, they visited and spoke to 60 PT, CT, FT, and PNT tenants.*

Board Report

Family and Community Services Department

- *We continued our partnership with Methodist College Mobile Diabetes Clinic. Nursing students will continue administering free on-site screenings for blood pressure, mass, Pre-diabetes, blood glucose, cholesterol, etc.*
- *Catholic Charities visited our Underwood and Benson Tower this month to play bingo, assist residents with food pantries, and ride to medical appointments. (48 Residents participated in the Bingo event.*
- *Youth involvement remains a top priority for our organization. We have continued to develop and implement programs that empower and engage young people in our community. Last month, we focused on mentorship programs, skills training, educational needs, and leadership development opportunities. This month, we have actively promoted scholarship opportunities to assist 91 OHA high school students pursuing higher education. Our team has worked diligently to ensure students know these opportunities.*
- *All educational opportunities have remained a top priority; coordinators have continued to serve students and push toward a better future for all. (33 HS students will be attending 2–4-year college this fall)*
- *Family Self-Sufficiency coordinators continued developing local strategies to connect participating families to public and private resources, increasing their earned income and financial empowerment, reducing or eliminating the need for welfare assistance, and progressing toward economic independence and self-sufficiency.*
- *Ongoing exchange of referrals with the Property Management team to address bedbug/housekeeping issues in the towers. (This month, 24 tenants were referred)*
- *Partnership with United Health Care to provide educational information and health disparities workshops throughout OHA's towers. (Hosted seminars, attended the Resources Fair, and served 47 tenants with their insurance plans.)*
- *GOCA/ENCAP continued to provide critical services to OHA tower residents. (This month, 66 tenants were served)*
- *Archwell Community Health Care continued to host Lunch and Learn events at OHA towers this month, and over 50 tenants participated.*
- *The OHA/TSF Soccer program is at the highest level in its history, with over 700 kids participating throughout the week for all-year-round programming. (15 teams are registered to play in the OHA/TSF Winter League)*
- *Continue our monthly follow-up/assessment with current high school seniors (37) on their performance in school, gather information on scholarships, GPAs, and college of interest information.*
- *Continued to work with 188 current OHA/TSF college students at Southeast CC, Central CC, MCC, Loyola University, Utah State, Oral Roberts, Oregon University, Iowa Western, Lincoln University-MO, Jackson State University, UNK, University of Wyoming, UNO, UNL, College of St. Central State Mary's, Creighton University, Southeast Community College, and Central Community College students to receive Scott Foundation Scholarship during the Fall and Spring semester. So far, the Scott Foundation has committed over \$275,000 annually.*
- *United Health Care continue to provide information about changes and benefit for Elderly population. (This month, 150 tenants were served).*
- *Nitsch Insurance visited four (Jackson, Underwood, Crown, and Benson), communicated with 60 residents, and helped them update their current insurance benefits.*

Board Report

Family and Community Services Department

- *Continued our partnership with The Simple Foundation for the 2024-25 school and Summer to provide and maintain OHA youth a safe place, coaching and learning opportunities. The Simple Foundation provides daily after-school Learning POD to OHA students at the Simple building. The program includes educational/technology support, social development, emotional support, and mental health. Students can attend from 10 am to 8:00 p.m.; breakfast, lunch, dinner, and snacks will be provided.*
- *OHA staff continues to bridge communication barriers with the Sudanese, Somali, and Somali Bantu populations throughout OHA programs. The most critical topics continue to focus on CNI, CNP, Trash, and Public Safety. (28 SS tenants were served.)*

The 2024 AASC National Service Coordinators Conference, the FSS team gained valuable insights and practical tools to elevate their support for resident and community needs. With more than 70 sessions to choose from, coordinators were able to engage with speakers and exhibitors who introduced the team to innovative services, programs, and resources. Highlights include:

- *Sessions like "Cultivating Cultural Competence in Service Coordination" and "Supporting Economic and Social Mobility," explored meaningful ways to foster inclusivity and empower resident growth.*
- *"Assisting Residents Navigating ACES" and "Disinformation in the Information Age" equipped coordinators with strategies to enhance residents' mental health and critical thinking skills.*
- *In "Uncovering Hidden Resources for Your Residents," the team explored lesser-known programs and tools to enrich their services.*
- *Finally, the conference offered excellent networking opportunities, connecting FSS Coordinators with a wide community of service coordinators, property managers, and housing professionals to share insights and build valuable connections.*
- *During this conference, we met some local service coordinators that work with elderly and disabled; we exchanged information to network*

The 2024 National Association of Case Management (NACM), Some key insights that the FSS team gained valuable and directly impact our work is the important role of the Housing First model in harm reduction and the need to balance it with a common-sense approach to client care. Some valuable tools for identifying and guarding compassion fatigue, are a critical issue for professionals in this field. We explored how cultural competency plays a pivotal role in trauma-informed care, ensuring that case managers are sensitive to the diverse backgrounds and experiences of those they serve.

A major highlight of the conference was a keynote speech by Ken Nwadike Jr., founder of the Free Hugs Project, who spoke passionately about the power of empathy, kindness, and human connection. His message about how simple acts of compassion can inspire positive change deeply resonated with the FSS team, underscoring the importance of connecting with clients on a human level.

The conference not only provided cutting-edge knowledge and networking opportunities but also reinforced the importance of empathy and human connection in both professional practice and in making a difference in the lives of those we serve. The insights we gained will help us deliver better, more compassionate care while maintaining in our own personal well-being in the process.

Board Report

Family and Community Services Department

The National FSS Conference was specifically designed for FSS practitioners to connect, learn, and enhance their programs. It equipped FSS teams with a wealth of best practices, innovative strategies, and valuable networking opportunities to help deliver more effective FSS programs within our communities. Some key highlights:

- *Massachusetts FSS Coordinators Group: Statewide Collaboration for FSS Success a group that regularly meets to collaborate and exchange best practices in FSS. The group discussed the benefits of collaboration across programs, and how other states can create similar groups for their FSS programs.*
- *Encouraging Client-Centered Policies Interim Withdrawals- The importance of how an interim withdrawal from participants escrow account can prevent a snowball effect on their finances Interim withdrawals can unlock major success by addressing short term goals.*
- *Home Visits: A total of 102 home visits were conducted for Southside residents and scatter sites during the reporting period. These visits remain a cornerstone of our outreach efforts, providing direct engagement with families to assess their needs and offer support. Key outcomes include:*
- *Assessing Family Needs: Ensuring that families relate to the appropriate resources and services such as job fairs and holiday events, and partners who are doing turkey drives.*
- *Strengthening Relationships: Building trust and fostering ongoing communication within the community and families on relocation phase 2A, 2B, 2C, and 2D.*
- *Feedback from residents has been highly positive, with many appreciating the personal attention and immediate support provided during these visits. Coordinator continues to refine strategies to maximize the impact of this outreach.*
- *Partner Meetings: We also held multiple meetings with new partners in the community, which have proven to be valuable in expanding our service network. Key achievements from these meetings include:*
- *Strengthened Partnerships: Establishing relationships with new community organizations, agencies, and stakeholders to enhance the range of services available to families.*
- *Collaborative Initiatives: Exploring potential joint programs, funding opportunities, and resource-sharing that can help address the diverse needs of Southside residents and our youth.*
- *Alignment of Services: Identifying unity between our programs and those of new partners to create a seamless network of support.*
- *These new collaborations hold great promise for increasing the impact of our programs, and we look forward to leveraging these partnerships to serve the community better. (Code Black, OPS, YMCA).*
- *Job Fair: A Job Fair was recently hosted, attracting over 30 OHA families. The event was designed to connect residents with employment opportunities and provide additional job-readiness support. Key outcomes include:*
- *Diverse Employment Opportunities: Participants had access to various employers offering roles across different industries, including both entry-level and specialized positions.*
- *Support Services: In addition to job listings, participants could access career counseling, resume workshops, and interview preparation, which contributed to a more comprehensive job-seeking experience.*
- *Strong Community Engagement: The turnout was excellent, with families eager to explore opportunities for economic advancement.*

Board Report

Family and Community Services Department

- *This event reflects our commitment to improving the financial stability and self-sufficiency of OHA families and is part of our broader strategy to reduce barriers to employment.*

UPCOMING EVENTS:

- *Monthly CPHHE-Governance Committee & Journal Club meeting.*
- *Closing on two homes.*
- *FSS Rebranding and creating Resident Services Social Media account*
- *HCV Homeownership Covering*
- *FHAS Homeownership partnership meeting.*
- *FSS Grant is Due.*
- *HUD-Substance Misuse & Harm Reduction Workshop.*
- *St. Vicent DePaul Coat & Winter Giveaway.*
- *Community Career Fair-Goodwill-November*
- *United Way Annual Meeting/Luncheon.*
- *Meeting with MCC Marketing and College Recruitment.*
- *Thanksgiving Turkey Drive*
- *Toys 4 Tot Drive*
- *OPS Meeting.*
- *Coats 4 Kids Drive*
- *Heartland Workforce Solution/OHA Job Fair*
- *ROSS-HUD Reporting is due.*
- *AASC Conference*
- *Case Management conference.*
- *FSS National Conference.*
- *NAHRO National Conference.*
- *School Outreach events*
- *Ongoing Nebraska methodist College-Flu Shots.*
- *Mental Health Service-Charles Drew and Community Alliance*
- *Outreach Medicare Open Enrollment.*
- *Goodwill Training at the towers.*
- *Residents Engagement meeting.*
- *OHA/NOCP Resources Event.*
- *Borderless Committee meeting*
- *October Mental Health Roundtable.*
- *HWS all partners meetings*
- *Novel Care Visits.*

Board Report

Family and Community Services Department

- *Archwell- Health Care Fit Event*
- *Charles Drew Mental Health Outreach.*
- *UnitedHealth Care Events.*
- *OHA Health Fair TBD*
- *TSF Youth Career Day TBD*
- *HUD FSS office hours.*
- *Email Etiquette and Interview Essential Workshop.*
- *Build Your Resume and Job Search Basics Workshop.*
- *Get Organized and Time Management Workshop.*
- *Microsoft Word/Excel Workshop.*
- *ROSS PCC meeting.*
- *HUD-Strong Families Resources Webinar.*
- *Continue recruiting for the FSS and ROSS SC programs.*

7.11. Legal

Memorandum



To: OHA Board of Commissioners

From: Brian Hansen, General Counsel

Date: December 19, 2024

Re: Legal Matters

<i>Select Contracting v. OHA</i>	Breach of contract	08/18/23 P Complaint 11/12/23 OHA Answer filed 01/16/24 Proposed Scheduling Order filed 12/03/24 Scheduling Order Amended	Douglas County District Court	PENDING
<i>Henry Lee, Hasani Lee, Toni Wiggins v. OHA</i>	Misc civil complaint	03/5/24 P Complaint filed 3/19/24 Amended Complaint filed 4/15/24 OHA Motions filed 07/1/24 Hearing on OHA's Motions 7/31/24 OHA Answer & Scheduling Filed 11/06/24 Hearing on OHA's Motions 12/12/24 Case Dismissed	Douglas County District Court	RESOLVED
<i>Hasani Lee and Toni Wiggins v. OHA</i> CI24-2225	Misc civil complaint	3/21/24 P Complaint filed 8/27/24 Hearing on OHA's Motions 10/6/24 Case reinstated against OHA Motion for Summary Judgment	Douglas County District Court	PENDING
<i>Hasani Lee and Toni Wiggins v. OHA</i> CI24-3481	Misc civil complaint	05/3/24 P Complaint filed 05/6/24 OHA served 06/4/24 OHA answer filed 6/12/24 Amended Complaint filed 8/27/24 Hearing on OHA's Motions 10/29/24 Answered filed Motion for Summary Judgment	Douglas County District Court	PENDING
<i>Cribbs v. OHA</i>	Negligence et al.	12/29/23 P Complaints filed 04/25/24 OHA answer filed Discovery in process Waiting on Dismissal	Douglas County District Court	PENDING
<i>Sherman Wells v. OHA, et al.</i>	Misc. civil complaint	05/15/24 Complaint filed 06/21/24 OHA answer filed 09/16/24 Notice of hearing 10/15/24 Case Dismissed	Douglas County District Court	RESOLVED
<i>Booth v. OHA</i>	Removed to County court	09/09/22 T filed small claim 09/30/22 OHA filed answer 04/10/24 Trial held 06/27/24 Judge ordered partial reimbursement	Douglas County Court	RESOLVED
<i>Lide v. OHA</i>	T counter claim	5/24/24 Counter claim associated with eviction 6/13/24 OHA answer filed 11/14/24 Pre-Trial Hearing	Douglas County Court	PENDING
<i>Freeman v. OHA</i>	T counter claim	09/06/24 P Complaint filed 11/28/24 OHA Answer filed 01/07/24 Hearing	Douglas County District Court	PENDING
<i>Bush, et al. v. OHA</i>	Civil Rights	06/27/24 Complaint filed Settlement negotiations	US District Court, NE	PENDING

TENANT & PROGRAM PARTICIPANT CLAIMS

CASE	CLAIM	ACTIONS/FILINGS	FORUM	RESOLVED?
<i>Calloway v. OHA</i>	Misc. civil complaint	08/13/24 Intent to Sue Letter 12/19/24 Discussion with Board		PENDING
<i>Calloway v. OHA</i>	Misc. civil complaint	6/14/24 P Complaint filed 7/19/24 Motion to Dismiss filed 8/13/24 Dismissed with Prejudice	Douglas District Court	RESOLVED
<i>Ziska v. OHA</i>	T discrimination	03/11/24 Notice of charge 03/25/24 OHA response submitted	HUD	RESOLVED
<i>Henry Lee v. OHA</i>	T discrimination	02/06/24 Notice of charge 07/31/24 Answer filed	OHRD	PENDING
<i>Johnson v. OHA</i>	T discrimination	3/25/24 Notice of charge 05/6/24 OHA response submitted	HUD	PENDING
<i>Kurtenbach v. OHA</i>	T discrimination	5/20/24 Notice of charge 6/13/24 OHA response submitted	NEOC	PENDING

EMPLOYEE CLAIMS

CASE	CLAIM	ACTIONS/FILINGS	FORUM	RESOLVED
<i>Harris v. OHA #1</i>	Employment discrimination	12/02/20 NEOC notice of complaint	NEOC	NO
<i>Harris v. OHA #2</i>	Employment discrimination	06/21/21 NEOC notice of complaint	NEOC	NO
<i>Harris v. OHA #3</i>	Employment discrimination	05/09/22 OHA received charge	NEOC	NO
<i>Harris v. OHA #4</i>	Employment discrimination	01/11/24 OHA received charge 03/11/24 OHA response submitted	NEOC	NO
<i>Raymer v. OHA</i>	Employment discrimination	07/17/23 OHA received charge 09/15/23 OHA response submitted 06/14/24 NEOC no reasonable cause	NEOC	RESOLVED
<i>Boatman v. OHA</i>	Employment discrimination	12/06/23 OHA received charge 02/01/24 OHA response submitted 06/12/24 NEOC Administrative Dismissal	NEOC	RESOLVED
<i>LA. Thomas v. OHA</i>	Employment discrimination	03/05/24 OHA received charge 05/15/24 OHA response submitted	NEOC	PENDING
<i>G. Thomas v. OHA</i>	Employment discrimination	3/12/24 OHA received charge 5/6/24 OHA response submitted	NEOC	RESOLVED
<i>Early v. OHA</i>	Employment discrimination	09/13/24 NEOC notice of complaint 11/18/24 OHA Response filed	NEOC	PENDING
<i>Cobb v. OHA</i>	Employment discrimination	11/12/24 NEOC notice of complaint	NEOC	PENDING
<i>Diaz v. OHA</i>	Employment discrimination	10/17/24 NEOC notice of complaint OHA response due	NEOC	PENDING

2024 EVICTION CASES

	Eviction	Cured/Paid	Moved Out	Other/Dismiss	Pending	Denied	Total
Nonpayment	0	4	0	0	6	0	10
Lease	1	0	0	0	1	0	2

Criminal/HSW	0	0	0	0	0	0	0
11/24 Totals	1	4	0	0	7	0	12
10/24 Totals	7	7	3	2	4	0	23
09/24 Totals	7	4	2	7	7	0	27
08/24 Totals	11	3	2	3	0	0	19
07/24 Totals	0	0	0	0	0	0	0
06/24 Totals	2	4	0	10	6	0	22
05/24 Totals	11	5	2	15	9	1	43
04/24 Totals	4	1	1	2	0	0	8
03/24 Totals	1	3	1	1	0	0	6
02/24 Totals	0	0	0	0	0	0	0
01/24 Totals	0	0	1	0	0	0	1
2023 Totals	107	191	40	74	0	2	414

8. NEW BUSINESS

9. EXECUTIVE SESSION FOR LEGAL, REAL ESTATE, AND/OR PERSONNEL
MATTERS

10. ADJOURNMENT