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KEY MODIFICATIONS TO THE HOMES FOR GOOD RENT ASSISTANCE ADMINISTRATIVE PLAN FISCAL YEAR 2025 EFFECTIVE DATE 10-1-2024 TO 9-30-2025

PROPOSED CHANGES TO THE FOLLOWING CHAPTERS

INTRODUCTION	1
CHAPTER 2 – FAIR HOUSING AND EQUAL OPPORTUNITY	1
CHAPTER 6 – INCOME AND SUBSIDY DETERMINATIONS	1
CHAPTER 7 – VERIFICATION	12
CHAPTER 11 – REEXAMINATIONS	26

**KEY MODIFICATIONS TO THE HOMES FOR GOOD
ADMINISTRATIVE PLAN FOR THE HOUSING CHOICE VOUCHER PROGRAM (ADMIN PLAN)
PROPOSED EFFECTIVE DATE 10-1-2024**

Section	Previous Policy	Proposed Policy	Required Change	Impact
2-I.C	None	<p>Applicants or tenant families who wish to file a VAWA complaint against the PHA may notify the PHA either orally or in writing.</p> <p>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.</p> <p>The PHA will attempt to remedy complaints made against the PHA and will conduct an investigation into all allegations of discrimination.</p> <p>The PHA will keep a record of all complaints, investigations, notices, and corrective actions. (See Chapter 16.)</p>	Yes	New Regulatory Language from HUD. Provides guidance and timelines for filing a VAWA complaint.
6-I.C	<p>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.</p> <p>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,</p>	<p>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.</p> <p>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</p>	Yes	New Regulatory Language from HUD. Removal of Enterprise Income Verification (EIV). HUD now requires Public Housing Agencies to vet income without the use of EIV and document a rationale for income sources that were utilized.

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	<p>If the family disputes the accuracy of the EIV employer data, and/or</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Known Changes in Income</p> <p>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.</p> <p>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}$).</p> <p>The family may present information that demonstrates that implementing a change before its effective date would create a hardship for the family. In such cases the PHA will calculate annual income using current circumstances and then require an interim</p>	<p>such cases the family may present information and documentation to the PHA to show why the historic pattern does not represent the family's anticipated income.</p> <p>In all cases, the family file will be documented with a clear record of the reason for the decision, and a clear audit trail will be left as to how the PHA annualized projected income.</p> <p>Known Changes in Income</p> <p>If the PHA verifies an upcoming increase or decrease in income, annual income will be calculated projected by applying each income amount to the appropriate part of the 12-month period.</p> <p>Example: An employer reports that a full-time employee who has been receiving \$8/hour will begin to receive \$8.25/hour in the eighth week after the effective date of the new admission or interim reexamination. In such a case the PHA would calculate annual income as follows: ($\\$8/\text{hour} \times 40 \text{ hours} \times 7 \text{ weeks}$) + ($\\$8.25 \times 40 \text{ hours} \times 45 \text{ weeks}$).</p> <p>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.</p>		

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	<p>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.</p> <p>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.</p>			
6-I.D	<p>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.</p>	None	Yes	<p>HUD required the removal of sporadic income. HUD now has an array of other regulatory language to abide by in counting income. Details on how income is being counted can be found here: 24 CFR 5.609(a); Notice PIH 2023-27</p>
6-I.G	<p>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.</p> <p>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.</p> <p>Example 1 Actual covered costs: \$20,000 Other student financial assistance: \$25,000 Excluded income: \$20,000 (\$25,000 in financial assistance -</p>	None	Yes	<p>HUD now requires student financial assistance to be counted as noted in the new policy. Prior to this HUD also required student financial assistance to be counted as income but not under a policy. This regulatory change is a result of HOTMA. With this change the cost of housing expense for eligible students is now factored into the expenses of the family. Prior to HOTMA, this expense was not factored in when determining subsidy assistance.</p>

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	<p>\$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</p>			

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	<p>\$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).</p>			
6-II.C	None	<p>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 \$1,000 or more. The family must cooperate with the appraiser but cannot be charged any costs related to the appraisal.</p>	Yes	<p>New regulations from HUD that places assets into two categories, Necessary and non-necessary personal property. Non-necessary personal property includes items such as boats and gems/precious metals.</p>
6-II.D	<p>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.</p>	None	Yes	<p>HUD has removed the policy for setting the passbook rate and has changed it to a regulation. The discretionary flexibility to set it within the 0.75 of the national rate has been removed.</p>

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	The effective date of changes to the passbook rate will be determined at the time of the review.			
6-III.D	Families that claim to have incurred health and medical care expenses may declare such expenses via submittal of third-party receipt of expense.		Yes	New Regulatory Language from HUD.
6-III.E	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 or assistance 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	None	Yes	HUD has changed this from a policy to a regulation.
6-III.E	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.	None	Yes	HUD has changed this from a policy to a regulation.
6-III.G	None	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.	Yes	Implementation of HOTMA. Families start anew in having their expenses utilized in assessing adjusted income.
6-III.G		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	Yes	For families that have more than 5% but less than 10 % of gross annual income in medical care and/or disability assistance expenses; these families could

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		<p>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 reexam in accordance with PHA policies.</p> <p>Examples of circumstances constituting a financial hardship may include the following situations:</p> <p>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.</p> <p>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</p> <p>Other circumstances as determined by the PHA.</p> <p>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.</p>		<p>potentially apply for this hardship exemption. to lower their threshold for medical care and/or disability expenses, which is then layered into the calculation of their adjusted income.</p>

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6-III.G	None	<p>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 14 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.</p> <p>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</p>	Yes	Provides clarity on the process of determination and implementation of hardship exemptions relating to medical expense.
6-III.G		<p>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 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</p>	Yes	Offers the family an opportunity to request an extension for a hardship exemption for medical expenses.

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		exemption if the PHA determines that the family no longer qualifies for the exemption.		
6-III.G		<p>For a family to qualify, they must demonstrate that their inability to pay rent would be as a result of the loss of this deduction. The PHA defines this hardship as a potential decrease in income or increase in other expenses that would result from the loss of the childcare expense and such loss would impact the family's ability to pay their rent.</p> <p>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.</p> <p>The family must also demonstrate that the childcare 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).</p> <p>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</p>	Yes	If the childcare expense deduction is ending for a family, they may request a hardship exemption.

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		attempt to obtain third-party verification prior to the end of the 90-day hardship exemption period.		
6-III.G		<p>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 14 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.</p> <p>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.</p>	Yes	Provides clarity on the process of determination and implementation of hardship exemptions relating to childcare expense deduction.
6-III.G	None	<p>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 extension 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.</p>	Yes	Offers the family an opportunity to request an extension for a hardship exemption for childcare expense deduction.

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6-III.H.	None	The PHA has opted not to use permissive deductions.	Yes	New Regulatory Language from HUD. No additional deductions will be applied to income.
6-IV.D	None	<p>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:</p> <p>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.</p> <p>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.</p> <p>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.</p>	Yes	Adds criteria for when a family may be approved for a higher utility allowance, including non-disability related reasons. Families will be provided information on utility relief programs.

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		<p>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.</p> <p>At its discretion, the PHA may reevaluate the need for the increased utility allowance at any regular reexamination.</p> <p>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.</p>		
7-I.B	None	<p>When available and applicable, the PHA may 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.</p> <p>Prior to using any Safe Harbor determination from another program, the PHA will ask the</p>	Yes	<p>If Safe Harbor is established, PHA would be able to utilize annualized income from an approved entity in determining annual income for the purpose of PHA requirements.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>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.</p> <p>In order to be acceptable, the income determination must:</p> <ul style="list-style-type: none"> 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. <p>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.</p> <p>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</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>should consider an alternative verification from a different Safe Harbor source.</p> <p>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 11. In this case, the PHA will use third-party verification to verify the change.</p>		
7-I.E	None	<p>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.</p>	Yes	<p>New Regulatory Language from HUD. This will help ensure that income reporting is accurate for the annual reexamination.</p>
7-I.E	None	<p>The PHA will generate the No Income Reported by HHS or SSA Report quarterly and will retain the report.</p> <p>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.</p>	Yes	<p>New Regulatory Language from HUD. This will help ensure that income reporting is accurate for the annual reexamination.</p>

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		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		
7-I.F.	<p>Third-party documents provided by the family must be dated within 60 days of receipt by the PHA.</p> <p>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.</p> <p>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.</p>	<p>In general, the PHA will use third-party verification from the source in the following circumstances:</p> <p>At annual reexamination when verification is not obtained under Level 6 or Level 5 (see 7-I.E UP-FRONT INCOME VERIFICATION (UIV))</p> <p>For all new admissions; and</p> <p>For all interim reexaminations.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	Yes	New Regulatory Language from HUD. Provides family a larger window of time to provide third-party documents for income verification.

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		family's circumstances (e.g., sporadic income, fluctuating schedule, etc.), the PHA may request additional paystubs or a payroll record.		
7-I.F.		<p>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 may 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 the amount in EIV, the amount 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.</p> <p>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.</p>		New Regulatory Language from HUD. When EIV is used for income verification, the family must certify that it is accurate.
7-I.G.	<p>The PHA may send third-party verification forms directly to the third party.</p> <p>Third-party verification forms will be sent when third-party verification documents are unavailable or are rejected by the PHA.</p> <p>The PHA will proceed to oral third-party verification if the third-party verification forms are not returned within five business days.</p>	PHA may substitute Level 2 (Oral third-party verification) for written, third-party verification form, before moving to self-certification.	No	Provides a quicker process for verifying income.

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7-I.H.	<p>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.</p> <p>When requesting third-party oral verification, PHA will wait 2 business days for response. If no response is provided within that timeframe, PHA will move on to self-certification.</p>	<p>If written third-party verification forms are not returned within 5 business days, the PHA will accept self-certification from the family without attempting to obtain oral third-party verification. If the PHA chooses to obtain oral third-party verification, the PHA will document in the file the date and time of the telephone call or visit, the name of the person contacted and the telephone number, as well as the information confirmed.</p> <p>When requesting third-party oral verification, PHA will wait 2 business days for response. If no response is provided within that timeframe, PHA will move on to self-certification.</p>	No	Provides a quicker process for verifying income.
7-I.I.	<p>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 may be signed in the presence of a PHA representative or notary public.</p>	<p>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.</p> <p>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</p>	No	Helps to ensure accuracy of information that is self-certified by requiring perjury statement be signed. Not required, however HUD recommends.

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		administrative penalties (18 U.S.C. 287, 1001, 1010, 1012; 31 U.S.C. 3279, 3802)."		
7-II.B	None	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.	No	New Regulatory Language from HUD. Expands the acceptable documentation to verify SSN
7-III.A	None	The following policies do not apply when the PHA uses a safe harbor income determination from a means-tested federal assistance program. 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. 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.	Yes	Clarifies that a PHA does not need to assess for tips/wages if the PHA uses another entity to determine income.
7-III.B	<p>Business owners and self-employed persons will be required to provide:</p> <p>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.</p> <p>All schedules completed for filing federal and local taxes in the preceding year.</p> <p>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.</p> <p>The PHA will provide a format for any person who is unable to provide such a statement to record income</p>	<p>Business owners and self-employed persons will be required to provide:</p> <p>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.).</p> <p>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.</p> <p>For self-employed individuals who claim they do not to file tax returns, The PHA will obtain a</p>	No	Best practice language from HUD to obtain IRS Form 4506-T for families with self-employment income who did not file taxes. Additionally, provides guidance on assessing income from employment such as Uber and DoorDash.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>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.</p> <p>At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.</p>	<p>completed copy of IRS Form 4506-T to verify that no return has been filed.</p> <p>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, and or utilize the Schedule C of the individual's tax return and the corresponding IRS Form 1099 or 1099k.</p> <p>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.</p> <p>At any reexamination the PHA may request documents that support submitted financial statements such as manifests, appointment books, cash books, or bank statements.</p>		
7-III.C	<p>To verify the SS/SSI benefits of applicants, the PHA will request a current (dated within the last 60 days) SSA benefit verification letter from each family member that receives social security benefits. If the family is unable to provide the document(s), the PHA will help the applicant request a benefit verification letter from SSA's web site at www.ssa.gov or ask the family to request one by calling SSA at 1-800-772-1213. Once the applicant has received the benefit verification letter, they will be required to provide it to the PHA.</p> <p>To verify the SS/SSI benefits of participants, the PHA will obtain information about social security/SSI benefits through the HUD EIV System and confirm with the participant(s) that the current listed benefit amount is correct. If the participant disputes the EIV-reported benefit amount, or if benefit information is not available</p>	None	Yes	Per HUD the old policy has changed to a regulation. The regulation provides 120 days to provide SSA/SSI information. The prior policy provided 60 days.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>in HUD systems, the PHA will request a current SSA benefit verification letter from each family member that receives social security benefits. If the family is unable to provide the document(s) the PHA will help the participant request a benefit verification letter from SSA's web site at www.ssa.gov or ask the family to request one by calling SSA at 1-800-772-1213. Once the participant has received the benefit verification letter, they will be required to provide it to the PHA.</p>			
7-III.D	<p>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:</p> <ul style="list-style-type: none"> Copy of the ledger/payment history from the support enforcement agency for the 60 days prior to PHA request Third-party verification form from the state or local child support enforcement agency The third-party verification form for the purpose of verification from the state or local support enforcement agency is the submittal of the release of information signed by the applicant/tenant and submitted by the PHA to request the required documentation. Third-party verification form from the person paying the support. <p>Refer to the verification hierarchy in Chapter 7-I for subsequent verification steps.</p> <p>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:</p> <ul style="list-style-type: none"> A statement from any agency responsible for enforcing payment that shows the family has requested 	<p>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.</p> <p>If the family declares that it receives regular payments, verification will be obtained in the following order of priority:</p> <ul style="list-style-type: none"> Third-party verification from the state or local child support enforcement agency Copies of the receipts and/or payment stubs for the 12 months prior to PHA request Third-party verification form from the person paying the support. Family's self-certification of amount received. <p>Note: Families are not required to undertake independent enforcement action.</p>	No/Yes	<p>Best practice language from HUD. Removes requirement for family to attempt to enforce child support payments.</p> <p>HUD regulatory change from 60 days to 12-month review period for payments made.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>enforcement and is cooperating with all enforcement efforts.</p> <p>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.</p> <p>Note: Families are not required to undertake independent enforcement action.</p>			
7-III.E	None	<p>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.</p>	Yes	<p>Provides additional guidance on how to assess what was formally known as sporadic income.</p>
7-III.F	<p>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.</p> <p>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.</p> <p>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.</p>	<p>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.</p> <p>When verification is required, in determining the value of checking or savings accounts, the PHA will use the current balance.</p> <p>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</p>	Yes	<p>New Regulatory Language from HUD. Raises the limit for when self-certification can be used.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
		checking account does not bear interest, the anticipated income from the account is zero.		
7-III.F	None	<p>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.</p> <p>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.</p>	Yes	New Regulatory Language from HUD. Requires family to self-certify whether they own real property.
7-III.G	<p>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.</p>	<p>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.</p>	No	New Regulatory Language from HUD. Allows self-certification.

Section	Previous Policy	Proposed Policy	Required Change	Impact
7-III.J	<p>The PHA will accept written third-party documents supplied by the family as evidence of the status of retirement accounts.</p> <p>The type of original document that will be accepted depends upon the family member’s retirement status.</p> <p><i>Before</i> retirement, the PHA will accept an original document from the entity holding the account with a date that shows it is the most recently scheduled statement for the account but in no case earlier than 6 months from the effective date of the examination.</p> <p><i>Upon</i> retirement, the PHA will accept an original document from the entity holding the account that reflects any distributions of the account balance, any lump sums taken and any regular payments.</p> <p><i>After</i> retirement, 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.</p>	<p>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.</p>	No	<p>Best practice language from HUD. Expands the time frame for retirement documentation to 12 months.</p>
7-III.M	<p>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.</p> <p>In addition, the PHA will request written verification of the student’s tuition, fees, and other required charges.</p> <p>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.</p>	<p>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.</p> <p>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.</p> <p>If the PHA is unable to obtain third-party written verification of the requested</p>	Yes	<p>New Regulatory Language from HUD. When student financial aid is from excluded, does not require verifying school expenses. Expands the types of costs that are included when required.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
		information, the PHA will pursue other forms of verification following the verification hierarchy in section 7-I.B.		
7-IV.B	<p>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.</p>	<p>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</p>	Yes	New Regulatory Language from HUD. Increases regulatory obligation to protect medically sensitive information.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>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].</p>		
7-IV.C	<p>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.</p>	<p>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</p>	Yes	New Regulatory Language from HUD. Increases regulatory obligation to protect medically sensitive information.

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>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].</p>		
11-I.E	None	<p>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.</p>	Yes	<p>New Regulatory Language from HUD. Allows alternative verification of income.</p>
11-II.B	<p>The PHA will not conduct a reexamination of income when a new family member is added. However, the PHA will verify all other aspects of program eligibility, such as criminal background, sex offender registry, debts owed, etc., when the family requests to add a new member. However, if the new member qualifies for a dependent deduction, an interim reexamination will be conducted so that the family member may be counted as part of the assisted household and given the dependent deduction.</p>	<p>All families must report all changes in family and household composition that occur between annual reexaminations within 14 business days of the change. The PHA will conduct interim reexaminations to account for any changes in household composition that occur between annual reexaminations.</p>	Yes	<p>Interim policy is revised to be in alignment with new regulatory Language from HUD.</p>

Section	Previous Policy	Proposed Policy	Required Change	Impact
11-II.C	None	<p>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.</p> <p>The PHA will process an interim reexamination for any increases in unearned income of 10 percent or more in adjusted income.</p> <p>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.</p>	Yes	New Regulatory Language from HUD. Provides thresholds for when interim ups will be completed.
11-II.C	<p>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. 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. Families are required to report all changes in income or expense, including increases in earned income, including new employment, at the next</p>	<p>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 14 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.</p>	Yes	New Regulatory Language from HUD requiring interim ups to be completed.

Section	Previous Policy	Proposed Policy	Required Change	Impact
	<p>Annual Recertification time period (beginning with the mailing of the Annual review packet to the tenant up until the effective date of the Annual Reexam). The PHA will only conduct interim reexaminations for families that qualify for the earned income disallowance (EID), and only when the EID family's share of rent will change as a result of the increase. In all other cases, the PHA will note the information in the tenant file but will not conduct an interim reexamination.</p> <p>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 unless the family requests an interim to increase rent. An example would be an FSS participant whose increases in rent are deposited into his or her FSS escrow account.</p> <p>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.</p>	<p>Within 14 business days of the family reporting the change, the PHA will determine whether the change will require an interim reexamination.</p> <p>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 within 14 business days of making this determination informing the family that the PHA will not conduct an interim reexamination.</p> <p>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 14 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, 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.</p>		

Section	Previous Policy	Proposed Policy	Required Change	Impact
		<p>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.</p>		