Summary of Proposed Substantive Changes to the Admissions and Continued Occupancy Policy

Effective January 1, 2027

1. Pg. 1-7 **I. PRIVACY RIGHTS**

   Add red: The executed HUD-9886-A consent forms will remain effective until the family is denied assistance, the tenancy is terminated, or if the family provides written notification to the PHA to revoke consent. The PHA will send notice to the family acknowledging receipt of request. Revoking consent will result in denial of admission or termination of tenancy.

   Reason: Housing Opportunities Through Modernization Act (HOTMA)

2. Pg. 2-9 **F. DENIAL OF ADMISSION FOR DRUG-RELATED AND/OR OTHER CRIMINAL ACTIVITY**

   Old: Persons who were evicted and/or have had their subsidy terminated from public housing, Indian housing, Section 23, or any Section 8 program because of drug-related criminal activity are ineligible for admission to Public Housing for a three (3) year period beginning on the date of such eviction.

   New: Persons who were evicted, moved out under an eviction and/or have had their subsidy terminated from public housing, Indian housing, Section 23, or any Section 8 program because of financial obligations, record of disturbing neighbors, destruction of property, or living or housekeeping habits, and/or criminal activity are ineligible for admission to Public Housing for a three (3) year period beginning on the date of such eviction.

   Reason: To clarify AMHA's policy

3. Pg. 2-11 **H. SCREENING FOR SUITABILITY**

   Add red: If the family has been evicted from federally assisted housing or has had their subsidy terminated for serious lease violation, other than drug related criminal activity (see Standard of Violation page 2-8), the applicant will be deemed unsuitable for 3 (three) years.

   Reason: To clarify AMHA's policy

4. Pg. 3-3 **A. HOW TO APPLY**

   Add red: The executed HUD-9886-A consent forms will remain effective until the family is denied assistance, the tenancy is terminated, or if the family provides written notification to the PHA to revoke consent. The PHA will send notice to the family acknowledging receipt of request. Revoking consent will result in denial of admission or termination of tenancy.

   Reason: HOTMA

5. Pg. 4-8 **B. WAITING LIST PREFERENCES**

   Add red: Project Based Voucher Under/Overhoused or Final Fail Preference

For the PHA's current Project Based Voucher (PBV) participants who are Underhoused or Overhoused in their unit according to Chapter 5 of the HCVP Administrative Plan or if the family's PBV unit final fails and they are unable to lease a new unit within the term of the voucher.

Reason: To adhere to regulation 24 CFR 983.208 (d)(6)(ii)

6. Pg. 5-3 **B. EXCEPTIONS TO OCCUPANCY STANDARDS**

   Add: business
   Delete: (ten)

   All members of the family residing in the unit must be approved by the PHA. The family must obtain approval of any additional family member before the person occupies the unit except for additions by birth, adoption, court-awarded custody, or placement by an authorized agency (such as foster care or kinship) in which case the family must inform the PHA within 10 business ~~(ten)~~ days.

   Reason: To clarify timeframe for families to report changes

7. Pg. 6-3 **B. INCOME AND ALLOWANCES**

   Add red: Financial support provided to the student in the form of a fee for services performed (e.g., non-federal work study or teaching fellowship)

   Reason: Clarification

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   Reason: Clarification

9. Pg. 6-10 **D. DISALLOWANCE OF EARNED INCOME FROM RENT DETERMINATIONS**

   Delete: Earned Income Disallowance (EID) section

   Reason: Sunset of Earned Income Disallowance 12/31/2025

10. Pg. 7-5 **B. RELEASE OF INFORMATION**

   Add red: The executed HUD-9886-A consent forms will remain effective until the family is denied assistance, the assistance is terminated, or if the family provides written notification to the PHA to revoke consent. Families have the right to revoke consent by providing written notice to the PHA. The PHA will send notice to the family acknowledging receipt of request. Revoking consent will result in denial of admission or termination of tenancy.

   Reason: HOTMA

11. Pg. 7-9 **D. VERIFICATION OF INCOME**

Old: Recurring Contributions
The source must complete the Monetary Contribution Form.

New: Recurring Contributions
The family must furnish a self-certification, and the PHA will verify as needed, which contains the following information:
• The person who provides the contributions
• The value of the contributions
• The regularity and length (dates) of the contributions
• The purpose of the contributions

Reason: To be consistent with HCV Administrative Plan

12. Pg. 7-16 **H. VERIFYING NON-FINANCIAL FACTORS**

Add red: Proof of another home address, such as utility bills, canceled checks for rent, driver's license, state-issued photo identification, or lease or rental agreement, if available. These documents should be no less than 90 days old at the time of the request to remove member.

Reason: To allow for state ID to be used as qualifying document

13. Pg. 7-18 **H. VERIFYING NON-FINANCIAL FACTORS**

Add: An original document issued by a federal or state government agency, which contains the name of the individual and the SSN of the individual, along with other identifying information.

Reason: To clarify AMHA's current policy

14. Pg. 7-21 **J. VERIFICATION OF WAITING LIST PREFERENCES**

Add red: **Project Based Voucher Under/Overhoused or Final Fail Preference**: for the PHA's current Project Based Voucher participants who are underhoused or overhoused in their unit according to Chapter 5 A. DETERMINING FAMILY UNIT (VOUCHER) SIZE [24 CFR 982.402] of the HCVP Administrative Plan or if the family's unit fails and they are unable to lease a new unit within the term of the voucher. PHA records will be used for this verification.

Reason: To adhere to regulation 24 CFR 983.208 (d)(6)(ii)

15. Pg. 8-4 **D. MANDATORY TRANSFERS**

Change: This policy may be modified if the losing development has an occupancy rate of less than ~~97~~ 98 percent.

Reason: To be consistent with occupancy goal of 98%

16. Pg. 9-3 **C. ADDITIONS TO LEASE**

    Add: business
    Delete: (ten)

    Family members age 18 and over who move from the dwelling unit to establish new households shall be removed from the lease. The resident must notify the PHA of the move-out within 10 business ~~(ten)~~ days of its occurrence.

    Reason: To clarify timeframe for families to report changes

17. Pg. 11-4 **C. REPORTING INTERIM CHANGES**

    Add red: To report any changes in family composition and/or income, a resident will be required to go to their Development Manager's Office or the website and complete a "Change of Family Status Form" within ten business days from the date the change occurred.

    Reason: To clarify timeframe for families to report changes

18. Pg. 11-6 **C. REPORTING INTERIM CHANGES**

    Old: The PHA will not perform interim reexaminations unless the net difference in a family's annual income (either an increase or a decrease) will amount to a difference of 10% or more. A series of smaller reported increases/decreases may cumulatively meet or exceed the 10% threshold, at which point the PHA must conduct an interim reexamination

    New: The PHA will conduct an interim reexamination any time the family's adjusted income has decreased, including an increase in allowances or deductions, unless the PHA confirms that the decrease will last less than 30 calendar days. The PHA will not perform interim reexamination increases unless the net difference in a family's annual income will amount to a difference of 10% or more. A series of smaller reported increases may cumulatively meet or exceed the 10% threshold, at which point the PHA must conduct an interim reexamination.

    Reason: HOTMA discretionary policy

19. Pg. 11-6 C. **REPORTING INTERIM CHANGES**

    Delete: A resident is participating in the Jobs Plus Earned Income Disallowance (JPEID) and experiences an increase in earned income unless the increase would result in an increase in TTP

    Reason: JPEID program ended 7/31/2025

20. Pg. 11-7 **C. REPORTING INTERIM CHANGES**

    Old: Participants may report a decrease in income and other changes that would reduce the amount of tenant rent, such as an increase in allowances or deductions. The PHA must process the change if it reduces annual income by 10% or more, taking into account all applicable changes to income and allowances/deductions. The PHA will process the rent adjustment unless the PHA confirms that the decrease in income will last less than 30 calendar days.

New: Participants may report a decrease in income and other changes that would reduce the amount of tenant rent, such as an increase in allowances or deductions. The PHA will conduct an interim reexamination any time the family's adjusted income has decreased, including an increase in allowances or deductions, unless the PHA confirms that the decrease will last less than 30 calendar days.

Reason: HOTMA discretionary policy

21. Pg. 11-8 **E. OTHER INTERIM REPORTING ISSUES**

Delete red: If the PHA makes a calculation error at admission to the program or at an annual or interim reexamination, including de minimis errors, a~~n interim~~ reexamination will be conducted to correct the error, if necessary, but the family will not be charged retroactively.

Reason: HOTMA

22. Pg. 11-10 **F. TIMELY REPORTING OF CHANGES IN INCOME**

Add red: Reporting in a timely manner is defined as being reported by completing the "Change of Family Status Form" at the Development Manager's office or online within 10 business days from the date that the change occurred.

Reason: To clarify timeframe for families to report changes

23. Pg. 11-11 **G. REPORTING CHANGES IN FAMILY COMPOSITION**

Add: business
Delete (ten) calendar

All changes in family composition must be reported, in writing, within 10 ~~(ten) calendar~~ business days of the occurrence by completing the "Change of Family Status Form" at the Development Manager's office or online.

Reason: To clarify timeframe for families to report changes

24. Pg. 14-3 **B. DEBTS DUE TO FRAUD/ NON-REPORTING OF INFORMATION**

Old: If a family owes an amount which equals or exceeds $5,000.00 as a result of program fraud, the case will be referred to the Financial Fraud Investigators. Where appropriate, the PHA will refer the case for criminal prosecution.

New: If a family owes an amount which equals or exceeds $7,500.00 as a result of program fraud, the case will be sent to the Financial Fraud Investigators and department supervisor/manager to determine if the case should be referred to the Legal department. Where appropriate, the PHA will refer the case for criminal prosecution.

Reason: To increase the amount owed for cases that will be referred to the Financial Fraud Investigators. Ohio Revised Code 2913.02.

25. Pg. 14-3 **B. DEBTS DUE TO FRAUD/NON-REPORTING OF INFORMATION**

    Delete: If the client owes an amount in excess of $5,000.00, the case will be reviewed by the Financial Fraud Investigators and Recertification Supervisor to determine if a repayment agreement can be established or if the case should be referred to the Legal department.

    Reason: To adhere to change in referral for cases that equal or exceed $7,500.00, covered in previous section

26. Pg. 15-2 **D. ANNUAL REEXAMINATIONS**

    Add: annually
    Delete: at each regularly scheduled annual reexamination

    For each public housing resident subject to the requirement of community service, the PHA shall ~~at each regularly scheduled annual reexamination~~ annually require each non-exempt family member to provide a signed self-certification to the PHA that he or she has performed qualifying activities over the previous twelve (12) months.

    Reason: To adjust meeting community service requirements for triennial households

27. **MTW Addendum** Throughout

    Add: Waiver approval dates

    Reason: Waivers approved since last Admissions and Occupancy Policy submission

28. MTW-8 **C. STREAMLINING WAIVERS**

    Add: 6. Exclude Financial Aid Income
    Submitted: 10/2/26, Expected Approval: 1/1/27

    Waives certain provisions of sections 3(a)(1) and 3(b)(4)-(5) of the 1937 Act and 24 CFR 5.609 and 960.257.

    Exclude all student financial aid from income.

    Reason: Newly requested waiver for 2027

29. MTW-8 **C. STREAMLINING WAIVERS**

    Add: 7. Discontinue Use of HUD’s Asset Passbook Rate
    Submitted: 10/2/26, Expected Approval: 1/1/27

    Waives certain provisions of sections 3(a)(1) and 3(b)(4)-(5) of the 1937 Act and 24 CFR 5.609 and 960.257.

    Do not use HUD’s asset passbook rate to determine income from assets. Only use income from assets provided through verification or self-certification.

    Reason: Newly requested waiver for 2027

30. MTW-9 **C. STREAMLINING WAIVERS**

Add red: 9. Self-Certification of Assets up to $50,000 <u>(or up to other HUD approved inflation amount)</u>

<u>*Or other HUD approved inflation amount</u>

Reason: To allow for annual adjustments to the asset threshold based on HUD’s published inflation adjusted values

31. MTW-13 **D. HARDSHIP POLICY**

Add red: Hardship Policy: Asset Self-Certification, Interim Reporting Policy, <u>Financial Aid Exclusion, HUD Passbook Rate</u>

Reason: To provide a hardship policy for newly requested waivers