Summary of Proposed Substantive Changes to the Administrative Plan

Effective January 1, 2027

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

   Add: The PHA will send notice to the family acknowledging receipt of request.
   Change: tenancy to assistance

   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~~ assistance.

   Reason: Housing Opportunities Through Modernization Act (HOTMA)

2. Pg. 2-8 **F. OTHER CRITERIA FOR ADMISSIONS**

   Add red: A family will not be admitted to the program if any member of the family has been evicted or moved out while under eviction from Federally assisted housing for serious violation of the lease within the past 3 years.

   Reason: To clarify AMHA's policy

3. Pg. 2-8 **F. OTHER CRITERIA FOR ADMISSIONS**

   Add: The PHA will send notice to the family acknowledging receipt of request.
   Change: tenancy to assistance

   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~~ assistance.

   Reason: HOTMA

4. Pg. 3-6 **F. REQUIREMENTS FOR ADMISSION**

   Add: The PHA will send notice to the family acknowledging receipt of request.
   Change: tenancy to assistance

   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~~ assistance

   Reason: HOTMA

5. Pg. 4-3 **C. LOCAL PREFERENCES**

   Add: 7. Summit County Continuum of Care (SCCoC) Coordinated Entry Emergency Vouchers Preferences: for applicants referred by SCCOC, Coordinated Entry the 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.

   These families will only be required to meet the mandatory screening criteria:

   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.

   As applicable, the SCCoC must provide documentation to the PHA of the referring agency's verification that the family meets one of the four eligible categories for assistance. The PHA must retain this documentation as part of the family's file. (This preference will be capped at 10 participants per year across all programs).

   Reason: Add preference for SCCoC Emergency Vouchers in preparation for loss of Shelter Plus Care Vouchers

6. Pg. 4-6 **C. LOCAL PREFERENCES**

   Add red: Insufficient Funding Preference: for families that were leased in a unit under HAP contract with AMHA and the HAP contract was terminated by AMHA due to insufficient funding for the HCV~~P~~ Program or other HUD sponsored program. If this preference is utilized, no other preferences will be given.

   Reason: To match canceled voucher preference

7. Pg. 4-7 **G. TARGEGTED FUNDING**

   Delete: Emergency Housing Voucher (EHV, See Temporary Policy Supplement)

   Reason: Transitioned all Emergency Housing Vouchers to Tenant-Based Vouchers

8. Pg. 4-8 **I. ORDER OF SELECTION**

   Add: Summit County Continuum of Care, (SCCoC) Coordinated Entry Emergency Vouchers(Capped at 10 participants per year- 2 points

   Reason: Add preference for SCCoC Emergency Vouchers in case the Shelter Plus Care Vouchers are not renewed with the new Notice of Funding Opportunity (NOFO)

9. Pg. 5-3 **B. EXCEPTIONS TO SUBSIDY STANDARDS**

   Add red: Changes for Participants
   The 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 new member occupies the unit except for additions by birth, adoption, court-awarded custody, or placement by an authorized agency, in which case the family must inform the PHA within 10 business days. The above referenced guidelines will apply.

   Reason: To clarify timeframe for families to report changes

10. Pg. 6-2 **A. INCOME AND ALLOWANCES**

   Add red: Student financial assistance does not include the below, which are included as annual income:
   Financial support provided to the student in the form of a fee for services performed (e.g., non-federal work study or teach fellowship)

   Reason: Clarification

11. Pg. 6-6 **A. INCOME AND ALLOWANCES**

   Add red: Student financial assistance does not include the below, which are included as annual income:
   Financial support provided to the student in the form of a fee for services performed (e.g., non-federal work study or teach fellowship)
   Reason: Clarification

12. Pg. 6-7 **B. DISALLOWANCE OF EARNED INCOME FROM RENT DETERMINATIONS FOR PERSON WITH DISABILITIES**

   Delete: Earned Income Disallowance (EID) section

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

13. Pg. 6-14 **C. DEFINITIONS OF TEMPORARILY/PERMANENTLY ABSENT**

   Add red: In the event that a visitor continues to reside in the unit after the maximum allowable time, the family must report it to the PHA in writing within 10 business days of the maximum allowable time.

   Reason: To clarify timeframe for families to report changes

14. Pg. 6-14 **C. DEFINITIONS OF TEMPORARILY/PERMANENTLY ABSENT**

Add red: Families are required to report any additions to the household in writing to the PHA within 10 business days of the move-in date.

Reason: To clarify timeframe for families to report changes

15. Pg. 6-14 **C. DEFINITIONS OF TEMPORARILY/PERMANENTLY ABSENT**

Add red: If a family member leaves the household, the family must report this change to the PHA, in writing, within 10 business days of the change and certify as to whether the member is temporarily absent or permanently absent.

Reason: To clarify timeframe for families to report changes

16. Pg. 7-4 **B. RELEASE OF INFORMATION**

Add: The PHA will send notice to the family acknowledging receipt of request.
Change: tenancy to assistance

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~~ assistance.

Reason: HOTMA

17. Pg. 7-7 **D. VERIFICATION OF INCOME**

Add red: The regularity and length (dates) of the contributions

Reason: To clarify information needed for monetary contributions

18. Pg. 7-11 **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.

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

19. Pg. 7-15 **I. VERIFICATION OF WAITING LIST PREFERENCES**

Add red: Insufficient Funding Preference: This preference is for families that were leased in a unit under a HAP contract with AMHA and the HAP contract was terminated by AMHA due to insufficient funding for the HCV~~P~~ Program or other HUD sponsored program.

Reason: To match canceled voucher preference

20. Pg. 12-1 **B. ANNUAL REEXAMINATION**

Add red: Families are required to be recertified at least annually or triennially. The terms annual recertification and annual reexamination or synonymous. Also refers to triennial reexamination.
Reason: To include triennial reexaminations

21. Pg. 12-4 **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

22. Pg. 12-5 **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

23. Pg. 12-5 **C. REPORTING INTERIM CHANGES**

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, an ~~interim~~ a reexamination will be conducted, if necessary, to correct the error, but the family will not be charged retroactively.

Reason: HOTMA clarification

24. Pg. 12-6 **D. OTHER INTERIM REPORTING ISSUES**

Add red: Standard for Timely Reporting of Changes
The PHA requires that families report interim changes in writing, to the PHA within 10 business days of when the change occurs.

If the change is not reported within the 10 business day time period, it will be considered untimely reporting.

Reason: To clarify timeframe for families to report changes

25. Pg. 13-1 **MOVES WITH CONTINUED ASSISTANCE/PORTABILITY**

    Delete: 982.314
    Add: 982.354(c)(1)

    Reason: To update reference

26. Pg. 13-1 **B. RESTRICTIONS ON MOVES**

    Delete: 982.314
    Add: 982.354(c)(d)(e)

    Reason: To update reference

27. Pg. 13-2 **C. PROCEDURE FOR MOVES**

    Change: 24 CFR 982.~~314~~ 354

    Reason: To update reference

28. Pg. 13-2 **C. PROCEDURE FOR MOVES**

    Delete red: Issuance of Voucher
    Subject to the restrictions on moves, if the family has not been recertified ~~within the last 365 days~~, the PHA will issue the voucher to move after conducting the reexamination.

    Reason: Clarification

29. Pg. 14-1 **B. TERMINATION BY THE FAMILY: MOVES**

    Change: 24 CFR 982.~~314 (c)(2)~~ 354(b)(3)

    Reason: To update reference

30. Pg. 15-10 **C. FAMILY OBLIGATIONS**

    Add: business
    Delete; calendar

    Program participants must report all changes in income to the PHA between annual re- exams. Household members reporting zero income who subsequently obtain income will be required to report the change in income within 10 ~~calendar~~ business days and complete the interim certification process

    Reason: To clarify timeframe for families to report changes

31. Pg. 15-10 **C. FAMILY OBLIGATIONS**

Add red: Explanations and Terms
The term 'promptly' when used with the family obligations always means 'within 10 business days.' Denial or termination of assistance is always optional except where this Plan or the regulations state otherwise.

Reason: To clarify timeframe for families to report changes

32. Pg. 17-2 **C. DEBTS DUE TO MISPRESENTATIONS/NON-REPORTING OF INFORMATION**

Old: Families who owe money to the PHA due to program fraud will be required to pay in accordance with the payment procedures for program fraud, below. If the family owes an amount in excess of $5,000.00 the case will be reviewed by the Financial Fraud Investigators and Housing Choice Voucher Manager or his/her designee to determine if the case should be referred to the Legal department if a repayment agreement can be established or if the case should be referred to the legal department~~.~~

New: Families who owe money to the PHA due to program fraud will be required to pay in accordance with the payment procedures for program fraud, below. If the family owes an amount in excess of $7,500.00 as result of program fraud, the case will be sent to the Financial Fraud Investigators and department supervisor/manager or his/her designee 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 amount for cases that will be referred to the Financial Fraud Investigators. Ohio Revised Code 2913.02

33. Pg. 19-12 **H. HOUSING MOBILITY-RELATED SERVICE PLAN (HMRP) PILOT**

Add: AMHA has created an HMRP program to help existing HCV voucher families with children ages 13 and younger gain access to housing in higher opportunity areas in Summit County. AMHA will help families by offering pre-move counseling sessions, short-term financial assistance if housing is in an opportunity area, housing search assistance, and by providing post-move support. The AMHA will make every effort to fast-track the voucher issuance process, the RFTA process and the initial scheduling of the inspection. The PHA may pre-inspect units that HMRP families are interested in leasing.

Reason: To include language about the HMRP Pilot program

34. Pg.20-1 **PROJECT-BASED VOUCHER (PBV) PROGRAM**

Add: AMHA must perform an analysis of the impact prior to selecting a project for the PBV assistance, if AMHA is project-basing 50 percent or more of the PHA's authorized voucher units.

Reason: To comply with Notice PIH 2024-19, PBV analysis impact

35. Pg. 20-3 **C. PROPOSAL SUBMISSION AND SELCTION**

Add: Factors outside AMHA's control may result in cancellation of the RFP. AMHA may rescind the selection if the PHA determines it does not have sufficient budget authority.

Reason: To clarify reasons RFP's can be canceled

36. Pg. 20-9 **G. PREFERENCES**

Add: Summit County Continuum of Care (SCCoC) Coordinated Entry Preference:
for applicants referred by SCCOC, Coordinated Entry the 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 SCCoC must provide documentation to the PHA of the referring agency's verification that the family meets one of the four eligible categories for assistance. The PHA must retain this documentation as part of the family's file. (This preference will be capped at 35 participants per year across all programs).

Summit County Continuum of Care (SCCoC) Coordinated Entry Emergency Vouchers Preferences: for applicants referred by SCCOC, Coordinated Entry the individual or family must meet one of four eligibility criteria listed above and these families will only be required to meet the mandatory screening criteria:

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.

As applicable, the SCCoC must provide documentation to the PHA of the referring agency's verification that the family meets one of the four eligible categories for assistance. The PHA must retain this documentation as part of the family's file. (This preference will be capped at 10 participants per year across all programs).

Reason: To be consistent with the preferences in Chapter 4 and to add a new preference if the Shelter Plus Care Vouchers are not renewed with the new NOFO through the Summit County Continuum of Care

37. Pg. 20-11 **G. PREFERENCES**

Add red: Insufficient Funding Preference: for families that were leased in a unit under a HAP contract with AMHA and the HAP contract was terminated by AMHA due to insufficient funding for the HCV~~P~~ Program or other HUD sponsored program. If this preference is utilized, no other preferences will be given.

Reason: To match canceled voucher preference

38. Pg. 20-11 **G. PREFERENCES**

Add: In Place Families: In order to minimize displacement of in-place families, if AMHA awards assistance to an existing unit or one requiring rehab and that unit is occupied by an eligible family on the proposal selection date, the in-place family must be placed on the AMHA's waiting list (if the family is not already on the list) and, once its continued eligibility is determined, given an absolute selection preference. Admission of such families is not subject to income-targeting under 24 CFR 982.201(b)(2)(i) and although such families have an absolute preference they must nevertheless be referred to the owner from the PHA's waiting list.

Reason: To protect in-place families already living in a unit when that unit is brought under a PBV HAP contract (24 CFR 983.251 (b))

39. Pg. 20-13 **G. PREFERENCES**

Add: Summit County Continuum of Care (SCCoC) Coordinated Entry Preference- 2 points
Summit County Continuum of Care (SCCoC) Coordinated Entry Emergency Preference- 2 points
In-Place Families- 20 points

Reason: To include preference points for all the preferences

40. Pg. 20-14 **K. PROCEDURES FOR FAMILIES OCCUPYING A UNIT OF THE WRONG SIZE OR AN ACCESSIBLE UNIT WHOS ACCESSIBILITY FEATURS ARE NOT REQUIRED BY THE FAMILY**

Change red: Continued assistance after unit, which may include, but is not limited to the following options: PBV assistance in an appropriate-sized unit (in the same ~~building~~ project or in another ~~building~~ project)

Reason: Clarification

41. Pg. 20-14 **K. PROCEDURES FOR FAMILIES OCCUPYING A UNIT OF THE WRONG SIZE OR AN ACCESSIBLE UNIT WHOS ACCESSIBILITY FEATURS ARE NOT REQUIRED BY THE FAMILY**

Change: Relevant Regulation*:* 24 CFR 983.~~259~~260

Reason: To update reference

42. Pg. 20-15 **M. HOUSING AUTHORITY DISCRETION**

Add: 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.

If the 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 order for a vacancy payment request to be considered, it must be made in writing (including via email) 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.

If vacancy payments are made, the PHA will make vacancy payments for the 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 not 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). Any vacancy payment will cover only the period the unit remains vacant.

Reason: To include vacancy payment standards per 24 CFR 983.352

43. **TEMPORARY POLICY SUPPLEMENT**

Delete Temporary Policy Supplement- Emergency Housing Vouchers (EHVs)

Reason: Transitioned all Emergency Housing Vouchers to Tenant-Based vouchers

44. **PROJECT BASED VOUCHERS (PBV) UNDER THE RENTAL ASSISTANCE DEMONSTRATION (RAD) PROGRAM APPENDIX**

Add appendix

Reason: AMHA plans to transition some of its properties through RAD conversions, and as a result, certain properties may be converted using some Project-Based Voucher (PBV) assistance.

45. **MTW Addendum** Throughout

Waiver approval dates

Reason: Waivers approved since last Admissions and Occupancy Policy submission

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

Add red: 4. Self-Certification of Assets up to $50,000 (or up to other HUD approved inflation amount)

*Or other HUD approved inflation amount

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

47. MTW-11 **C. STREAMLINING WAIVERS**

Add: 9. Exclude Financial Aid Income
Submitted: 10/2/26, Expected Approval: 1/1/27
Waives certain provisions of sections 3(a)(1), 3(b)(4)-(5), and 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.609 and 982.516.
Exclude all student financial aid from income.
Reason: Newly requested waiver for 2027

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

Add: 10. 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), 3(b)(4)-(5), and 8(o)(2)(A)-(C) of the 1937 Act and 24 CFR 5.609 and 982.516.
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

49. MTW-12 **C. STREAMLINING WAIVERS**

Add: 15. Require 24 Months in a Project-Based Voucher Unit before Moving with Tenant-Based Voucher
Submitted: 10/2/26, Expected Approval: 1/1/27
Waives certain provisions of section 8(o)(13)(E) of the 1937 Act and 24 CFR 983.261 as it was superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461.
A family residing in a PBV unit may terminate the assisted lease any time after the first two years of occupancy and request comparable tenant-based assistance from AMHA. If the family terminates the assisted lease before the end of the first two years of occupancy, the family will not be entitled to continued tenant-based assistance or priority for such assistance. All other provisions under Family's Right to Move in Chapter 20 of the plan will continue to apply.

Reason: Newly requested waiver for 2027

50. MTW-12 **C. STREAMLINING WAIVERS**

Add: 16. Discontinue Use of Wrong-Size Project-Based Voucher Rule
Submitted: 10/2/26, Expected Approval: 1/1/27
Waives certain provisions of 24 CFR 983.260.
If AMHA determines that a family is occupying a wrong-size PBV unit, AMHA will not require the family to move out of the unit. The family will still be eligible to move with tenant-based assistance or to an appropriately sized PBV/LIPH unit if they request to do so.
Reason: Newly requested waiver for 2027

51. MTW-12 **C. STREAMLINING WAIVERS**

Add: 18. Allow Residency Preference Points for Mainstream Voucher Holders

Submitted: 10/2/26, Expected Approval: 1/1/27
Waives certain provisions in PIH Notice 2024-30 related to Section 8(o)(6)(A) of the 1937 Act and 24 CFR 982.207(b)(1).
Allow Mainstream voucher holders to receive the wait list residency preference points.
Reason: Newly requested waiver for 2027

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

Add red: Hardship Policy: Asset Self-Certification, Interim Reporting Policy, Financial Aid Exclusion, HUD Passbook Rate, Wrong Size PBV Unit, Mainstream Residency Preference

If a household believes they have a circumstance that qualifies as a financial or other hardship related to this policy, the household must complete the Hardship Request form and attach proof of the hardship.

Reason: To provide a hardship policy for newly requested waivers