DRAFT
Agency Plan

Annual Plan for Fiscal Year 2024

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Submitted by:

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

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

Applicability. The Form HUD-50075-ST is to be completed annually by **STANDARD PHAs or TROUBLED PHAs**. PHAs that meet the definition of a High Performer PHA, Small PHA, HCV-Only PHA or Qualified PHA do not need to submit this form.

Definitions.

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

A.	**PHA Information.**

A.1

PHA Name: ___St Louis Housing Authority (SLHA ___________________________________ **PHA Code**: __MO-001_____________
PHA Type: ☒ Standard PHA ☐ Troubled PHA
PHA Plan for Fiscal Year Beginning: (MM/YYYY): ___10/2024___________
PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) 7165 Allocated
Number of Public Housing (PH) Units ___2805_______ **Number of Housing Choice Vouchers (HCVs)** _6060 Leased (April 2024)
Total Combined Units/Vouchers _______8866_ (April 2024)_____
PHA Plan Submission Type: ☒ Annual Submission ☐Revised Annual Submission

Availability of Information. PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on their official website. PHAs are also encouraged to provide each resident council a copy of their PHA Plans. **Reference Attachment #1 – A.1 Availability of Information**

☐ **PHA Consortia**: (Check box if submitting a Joint PHA Plan and complete table below)

Participating PHAs	**PHA Code**	**Program(s) in the Consortia**	**Program(s) not in the Consortia**	**No. of Units in Each Program**	
				PH	**HCV**
Lead PHA:					

B.	Plan Elements
B.1	**Revision of Existing PHA Plan Elements.** (a) Have the following PHA Plan elements been revised by the PHA? Y N ☒ ☐ Statement of Housing Needs and Strategy for Addressing Housing Needs **Reference Attachment #2 – B.1 (b)** ☒ ☐ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions. **Reference Attachment #3 – B.1 (b)** ☒ ☐ Financial Resources. **Reference Attachment #4 – B.1 (b)** ☒ ☐ Rent Determination. **Reference Attachment #5 – B.1 (b)** ☒ ☐ Operation and Management **Reference Attachment #6 – B.1 (b)**. ☐ ☒ Grievance Procedures. ☒ ☐ Homeownership Programs. **Reference Attachment #7 – B.1 (b)** ☒ ☐ Community Service and Self-Sufficiency Programs. **Reference Attachment #8 – B.1 (b)** ☐ ☒ Safety and Crime Prevention. ☐ ☒ Pet Policy. ☒ ☐ Asset Management. **Reference Attachment #9 – B.1 (b)** ☐ ☒ Substantial Deviation. ☐ ☒ Significant Amendment/Modification (b) If the PHA answered yes for any element, describe the revisions for each revised element(s): ***Reference attachments listed above.*** (c) The PHA must submit its Deconcentration Policy for Field Office review. **Reference Attachment #10 – B.1 (c)**
B.2	**New Activities. Reference Attachment #11 – B.2 (b) – New Activities Chart** (a) Does the PHA intend to undertake any new activities related to the following in the PHA's current Fiscal Year? Y N ☒ ☐ Hope VI or Choice Neighborhoods. ☒ ☐ Mixed Finance Modernization or Development. ☒ ☐ Demolition and/or Disposition. ☒ ☐ Designated Housing for Elderly and/or Disabled Families. ☐ ☒ Conversion of Public Housing to Tenant-Based Assistance. ☒ ☐ Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. ☐ ☒ Occupancy by Over-Income Families. ☐ ☒ Occupancy by Police Officers. ☐ ☒ Non-Smoking Policies. ☒ ☐ Project-Based Vouchers. ☒ ☐ Units with Approved Vacancies for Modernization. **Reference Attachment #12 – B.2 (b)** ☒ ☐ Other Capital Grant Programs (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants). (b) If any of these activities are planned for the current Fiscal Year, describe the activities. For new demolition activities, describe any public housing development or portion thereof, owned by the PHA for which the PHA has applied or will apply for demolition and/or disposition approval under section 18 of the 1937 Act under the separate demolition/disposition approval process. If using Project-Based Vouchers (PBVs), provide the projected number of project-based units and general locations, and describe how project basing would be consistent with the PHA Plan.
B.3	**Progress Report. Reference Attachment #13 – B.3** Provide a description of the PHA's progress in meeting its Mission and Goals described in the PHA 5-Year and Annual Plan.

B.4	**Capital Improvements.** Include a reference here to the most recent HUD-approved 5-Year Action Plan in EPIC and the date that it was approved. **"See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 01/30/2024"**
B.5	**Most Recent Fiscal Year Audit**. (a) Were there any findings in the most recent FY Audit? Y N ☐ ☒ (b) If yes, please describe:
C.	**Other Document and/or Certification Requirements.**
C.1	**Resident Advisory Board (RAB) Comments. Reference Attachment #14 – C.1** (a) Did the RAB(s) have comments to the PHA Plan? Y N ☐ ☒ (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations.
C.2	**Certification by State or Local Officials. Reference Attachment #15 – C.2** Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.3	**Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** **Reference Attachment #17 – C.3** Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed,* must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	**Challenged Elements.** If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y N ☐ ☒ If yes, include Challenged Elements.
C.5	**Troubled PHA.** (a) Does the PHA have any current Memorandum of Agreement, Performance Improvement Plan, or Recovery Plan in place? Y N N/A ☐ ☐ ☒ (b) If yes, please describe:
D.	**Affirmatively Furthering Fair Housing (AFFH).**

D.1	**Affirmatively Furthering Fair Housing (AFFH).** **Provide a statement of the PHA's strategies and actions to achieve fair housing goals outlined in an accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5). Use the chart provided below. (PHAs should add as many goals as necessary to overcome fair housing issues and contributing factors.) Until such time as the PHA is required to submit an AFH, the PHA is not obligated to complete this chart. The PHA will fulfill, nevertheless, the requirements at 24 CFR § 903.7(o) enacted prior to August 17, 2015. See Instructions for further detail on completing this item.**

Fair Housing Goal:
Describe fair housing strategies and actions to achieve the goal

Fair Housing Goal:
Describe fair housing strategies and actions to achieve the goal

Fair Housing Goal:
Describe fair housing strategies and actions to achieve the goal

Instructions for Preparation of Form HUD-50075-ST
Annual PHA Plan for Standard and Troubled PHAs

A. PHA Information. All PHAs must complete this section. (24 CFR §903.4)

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **PHA Inventory, Number of Public Housing Units and or Housing Choice Vouchers (HCVs), PHA Plan Submission Type**, and the **Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. (24 CFR §903.23(4)(e))

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table. (24 CFR §943.128(a))

B. Plan Elements. All PHAs must complete this section.

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no." (24 CFR §903.7)

☒ **Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data. The statement of housing needs shall be based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. Once the PHA has submitted an Assessment of Fair Housing (AFH), which includes an assessment of disproportionate housing needs in accordance with 24 CFR §5.154(d)(2)(iv), information on households with individuals with disabilities and households of various races and ethnic groups residing in the jurisdiction or on the waiting lists no longer needs to be included in the Statement of Housing Needs and Strategy for Addressing Housing Needs. (24 CFR §903.7(a)).

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR §903.7(a)(2)(i)) Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy. (24 CFR §903.7(a)(2)(ii))

☒ **Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions**. PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b)) Describe the PHA's admissions policy for deconcentration of poverty and income mixing of lower-income families in public housing. The Deconcentration Policy must describe the PHA's policy for bringing higher income tenants into lower income developments and lower income tenants into higher income developments. The deconcentration requirements apply to general occupancy and family public housing developments. Refer to 24 CFR §903.2(b)(2) for developments not subject to deconcentration of poverty and income mixing requirements. (24 CFR §903.7(b)) Describe the PHA's procedures for maintain waiting lists for admission to public housing and address any site-based waiting lists. (24 CFR §903.7(b)). A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV. (24 CFR §903.7(b)) Describe the unit assignment policies for public housing. (24 CFR §903.7(b))

☒ **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA operating, capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources. (24 CFR §903.7(c))

☒ **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units, including applicable public housing flat rents, minimum rents, voucher family rent contributions, and payment standard policies. (24 CFR §903.7(d))

☒ **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance and management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA. (24 CFR §903.7(e))

☐ **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants. (24 CFR §903.7(f))

☒ **Homeownership Programs**. A description of any Section 5h, Section 32, Section 8y, or HOPE I public housing or Housing Choice Voucher (HCV) homeownership programs (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval. (24 CFR §903.7(k))

☒ **Community Service and Self Sufficiency Programs**. Describe how the PHA will comply with the requirements of (24 CFR §903.7(l)). Provide a description of: **1)** Any programs relating to services and amenities provided or offered to assisted families; and **2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs subject to Section 3 of the Housing and Urban Development Act of 1968 (24 CFR Part 135) and FSS. (24 CFR §903.7(l))

☐ **Safety and Crime Prevention (VAWA).** Describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must provide development-by-development or jurisdiction wide-basis: (i) A description of the need for measures to ensure the safety of public housing residents; (ii) A description of any crime prevention activities conducted or to be conducted by the PHA; and (iii) A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities. (24 CFR §903.7(m)) A description of: **1)** Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; **2)** Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and **3)** Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families. (24 CFR §903.7(m)(5))

☐ **Pet Policy.** Describe the PHA's policies and requirements pertaining to the ownership of pets in public housing. (24 CFR §903.7(n))

☒ **Asset Management.** State how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory. (24 CFR §903.7(q))

☐ **Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan. (24 CFR §903.7(r)(2)(i))

☐ **Significant Amendment/Modification**. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan. For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH-2012-32 REV-3, successor RAD Implementation Notices, or other RAD Notices.

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

PHAs must submit a Deconcentration Policy for Field Office review. For additional guidance on what a PHA must do to deconcentrate poverty in its development and comply with fair housing requirements, see 24 CFR 903.2. (24 CFR §903.23(b))

B.2 **New Activities.** If the PHA intends to undertake any new activities related to these elements in the current Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

☐ **HOPE VI or Choice Neighborhoods. 1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Choice Neighborhoods; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Hope VI or Choice Neighborhoods is a separate process. See guidance on HUD's website at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6 **.** (Notice PIH 2011-47)

☒ **Mixed Finance Modernization or Development. 1)** A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Mixed Finance Modernization or Development; and **2)** A timetable for the submission of applications or proposals. The application and approval process for Mixed Finance Modernization or Development is a separate process. See guidance on HUD's website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/hope6/mfph#4

☒ **Demolition and/or Disposition.** With respect to public housing only, describe any public housing development(s), or portion of a public housing development projects, owned by the PHA and subject to ACCs (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition approval under section 18 of the 1937 Act (42 U.S.C. 1437p); and (2) A timetable for the demolition or disposition. This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed as described in the PHA's last Annual and/or 5-Year PHA Plan submission. The application and approval process for demolition and/or disposition is a separate process. Approval of the PHA Plan does not constitute approval of these activities. See guidance on HUD's website at: http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm. (24 CFR §903.7(h))

☒ **Designated Housing for Elderly and Disabled Families.** Describe any public housing projects owned, assisted or operated by the PHA (or portions thereof), in the upcoming fiscal year, that the PHA has continually operated as, has designated, or will apply for designation for occupancy by elderly and/or disabled families only. Include the following information: **1**) development name and number; **2**) designation type; **3**) application status; **4**) date the designation was approved, submitted, or planned for submission, **5**) the number of units affected and; **6)** expiration date of the designation of any HUD approved plan. **Note**: The application and approval process for such designations is separate from the PHA Plan process, and PHA Plan approval does not constitute HUD approval of any designation. (24 CFR §903.7(i)(C))

☐ **Conversion of Public Housing under the Voluntary or Mandatory Conversion programs.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA is required to convert or plans to voluntarily convert to tenant-based assistance; **2)** An analysis of the projects or buildings required to be converted; and **3)** A statement of the amount of assistance received to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

http://www.hud.gov/offices/pih/centers/sac/conversion.cfm**.** (24 CFR §903.7(j))

☒ **Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program.** Describe any public housing building(s) (including project number and unit count) owned by the PHA that the PHA plans to voluntarily convert to Project-Based Rental Assistance or Project-Based Vouchers under RAD. See additional guidance on HUD's website at: Notice PIH 2012-32 REV-3, successor RAD Implementation Notices, and other RAD notices.

☐ **Occupancy by Over-Income Families.** A PHA that owns or operates fewer than two hundred fifty (250) public housing units, may lease a unit in a public housing development to an over-income family (a family whose annual income exceeds the limit for a low income family at the time of initial occupancy), if all the following conditions are satisfied: (1) There are no eligible low income families on the PHA waiting list or applying for public housing assistance when the unit is leased to an over-income family; (2) The PHA has publicized availability of the unit for rental to eligible low income families, including publishing public notice of such availability in a newspaper of general circulation in the jurisdiction at least thirty days before offering the unit to an over-income family; (3) The over-income family rents the unit on a month-to-month basis for a rent that is not less than the PHA's cost to operate the unit; (4) The lease to the over-income family provides that the family agrees to vacate the unit when needed for rental to an eligible family; and (5) The PHA gives the over-income family at least thirty days notice to vacate the unit when the unit is needed for rental to an eligible family. The PHA may incorporate information on occupancy by over-income families into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.503) (24 CFR 903.7(b))

☐ **Occupancy by Police Officers.** The PHA may allow police officers who would not otherwise be eligible for occupancy in public housing, to reside in a public housing dwelling unit. The PHA must include the number and location of the units to be occupied by police officers, and the terms and conditions of their tenancies; and a statement that such occupancy is needed to increase security for public housing residents. A "police officer" means a person determined by the PHA to be, during the period of residence of that person in public housing, employed on a full-time basis as a duly licensed professional police officer by a Federal, State or local government or by any agency of these governments. An officer of an accredited police force of a housing agency may qualify. The PHA may incorporate information on occupancy by police officers into its PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. See additional guidance on HUD's website at: Notice PIH 2011-7. (24 CFR 960.505) (24 CFR 903.7(b))

☐ **Non-Smoking Policies.** The PHA may implement non-smoking policies in its public housing program and incorporate this into its PHA Plan statement of operation and management and the rules and standards that will apply to its projects. See additional guidance on HUD's website at: Notice PIH 2009-21 and Notice PIH-2017-03. (24 CFR §903.7(e))

☒ **Project-Based Vouchers.** Describe any plans to use Housing Choice Vouchers (HCVs) for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 983.57(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations, and describe how project-basing would be consistent with the PHA Plan (24 CFR §903.7(b)).

☒ **Units with Approved Vacancies for Modernization.** The PHA must include a statement related to units with approved vacancies that are undergoing modernization in accordance with 24 CFR §990.145(a)(1).

☒ **Other Capital Grant Programs** (i.e., Capital Fund Community Facilities Grants or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the current Fiscal Year, provide a description of the activity in the space provided.

B.3 **Progress Report.** For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan. (24 CFR §903.7(r)(1))

B.4 **Capital Improvements.** PHAs that receive funding from the Capital Fund Program (CFP) must complete this section (24 CFR §903.7 (g)). To comply with this requirement, the PHA must reference the most recent HUD approved Capital Fund 5 Year Action Plan in EPIC and the date that it was approved. PHAs can reference the form by including the following language in the Capital Improvement section of the appropriate Annual or Streamlined PHA Plan Template: "See Capital Fund 5 Year Action Plan in EPIC approved by HUD on 01/30/2024."

B.5 **Most Recent Fiscal Year Audit.** If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided. (24 CFR §903.7(p))

C. Other Document and/or Certification Requirements.

C.1 **Resident Advisory Board (RAB) comments**. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations. (24 CFR §903.13(c), 24 CFR §903.19)

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan. (24 CFR §903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 **Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of §§ 903.7(o)(1) and 903.15(d) and: (i) examines its programs or proposed programs; (ii) identifies any fair housing issues and contributing factors within those programs, in accordance with 24 CFR 5.154 or 24 CFR 5.160(a)(3) as applicable; (iii) specifies actions and strategies designed to address contributing factors, related fair housing issues, and goals in the applicable Assessment of Fair Housing consistent with 24 CFR 5.154 in a reasonable manner in view of the resources available; (iv) works with jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; (v) operates programs in a manner consistent with any applicable consolidated plan under 24 CFR part 91, and with any order or agreement, to comply with the authorities specified in paragraph (o)(1) of this section; (vi) complies with any contribution or consultation requirement with respect to any applicable AFH, in accordance with 24 CFR 5.150 through 5.180; (vii) maintains records reflecting these analyses, actions, and the results of these actions; and (viii) takes steps acceptable to HUD to remedy known fair housing or civil rights violations. impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction. (24 CFR §903.7(o)).

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public.

C.5 Troubled PHA. If the PHA is designated troubled, and has a current MOA, improvement plan, or recovery plan in place, mark "yes," and describe that plan. Include dates in the description and most recent revisions of these documents as attachments. If the PHA is troubled, but does not have any of these items, mark "no." If the PHA is not troubled, mark "N/A." (24 CFR §903.9)

D. Affirmatively Furthering Fair Housing (AFFH).

D.1 Affirmatively Furthering Fair Housing. The PHA will use the answer blocks in item D.1 to provide a statement of its strategies and actions to implement each fair housing goal outlined in its accepted Assessment of Fair Housing (AFH) consistent with 24 CFR § 5.154(d)(5) that states, in relevant part: "To implement goals and priorities in an AFH, strategies and actions shall be included in program participants' … PHA Plans (including any plans incorporated therein) …. Strategies and actions must affirmatively further fair housing …." Use the chart provided to specify each fair housing goal from the PHA's AFH for which the PHA is the responsible program participant – whether the AFH was prepared solely by the PHA, jointly with one or more other PHAs, or in collaboration with a state or local jurisdiction – and specify the fair housing strategies and actions to be implemented by the PHA during the period covered by this PHA Plan. If there are more than three fair housing goals, add answer blocks as necessary.

Until such time as the PHA is required to submit an AFH, the PHA will not have to complete section D., nevertheless , the PHA will address its obligation to affirmatively further fair housing in part by fulfilling the requirements at 24 CFR 903.7(o)(3) enacted prior to August 17, 2015, which means that it examines its own programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintain records reflecting these analyses and actions. Furthermore, under Section 5A(d)(15) of the U.S. Housing Act of 1937, as amended, a PHA must submit a civil rights certification with its Annual PHA Plan, which is described at 24 CFR 903.7(o)(1) except for qualified PHAs who submit the Form HUD-50077-CR as a standalone document.

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the 5-Year and Annual PHA Plan.

Public reporting burden for this information collection is estimated to average 7.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

St. Louis Housing Authority

FY 2024 Annual Plan

Table of Attachments

Annual PHA Plan (Standard PHAs) – HUD-50075-ST

ATTACHMENT #1

Section A.1 – PHA Information
Availability of Information

SLHA maintains relevant information regarding the Agency Plan at on its website (www.slha.org), main administrative office and at each Asset Management Developments Listed Below:

1. St. Louis Housing Authority, 3520 Page Boulevard, St. Louis, MO 63106
2. Clinton-Peabody – MO001-000002, 1401 LaSalle Street, St. Louis, MO 63104
3. James House – MO001-000010, 4310 St. Ferdinand, St. Louis, MO 63113
4. Euclid Plaza –MO001-000013B, 5310 N. Euclid, St. Louis, MO 63115
5. McMillan Manor (North Side Scattered Sites) – MO001-000041,051
   1007 N. Taylor, St. Louis, MO 63108
6. West Pine – MO001-000017, 4490 West Pine, St. Louis, MO 63108
7. Parkview Apartments – MO001-000019, 4451 Forest Park, St. Louis, MO 63108
8. Lafayette Apartments (South Side Scattered Sites) – MO001-000038
   3447 Lafayette, St. Louis, MO 63104
9. Badenhaus & Badenfest – MO001-000028, 8450 Gast Place, St. Louis, MO 63147
10. LaSalle Park – MO001-000034, 1001 Hickory, St. Louis, MO 63104
11. Cochran Plaza – MO001-000037, 1420 N. 10th Street, St. Louis, MO 63106
12. Murphy Park I, II & III – MO001-000044,045,046
    1920 Cass Avenue, St. Louis, MO 63106
13. King Louis Square I – MO001-000047, 1524 S. 13th Street, St. Louis, MO 63104
14. King Louis Square II – MO001-000049, 1129 Hickory Street, St. Louis, MO 63104
15. Les Chateaux – MO001-000048, 1330 Chouteau, St. Louis, MO 63103
16. Renaissance Place at Grand I, II, & III – M036-P001-050, 057,059
    1001 N. Compton, St. Louis, MO 63106
17. Senior Living and Gardens at Renaissance Place – M0001-000054, and MO001-000055
    3217 Martin Luther King Dr., St. Louis, MO 63106
18. Cahill House – MO001-000056, 1919 O'Fallon Place, St. Louis, MO 63106
19. Cambridge Heights I & II – MO001-000058,060, 703 O'Fallon, St. Louis, MO 63106
20. Kingsbury Terrace – MO001-000061, 5655 Kingsbury, St. Louis, MO 63112
21. Senior Living at Cambridge Heights - MO001-000062, 728 Biddle, St. Louis, MO 63106
22. Arlington Grove – MO001-000063, 5547 Dr. Martin Luther King, St. Louis, MO 63112
23. North Sarah I, II & III Apartments - MO001-000064,065, 066
    1024 North Sarah, St. Louis, MO 63113
24. Preservation Square I – MO001-000067, 1406 N. 16th Street, St. Louis MO 63106

Detailed information regarding the Agency Plan components can be viewed at the SLHA website, www.slha.org. The Agency Plan and all relevant components are available for **viewing by appointment only** at the SLHA's Central Office, located at 3520 Page Blvd., St. Louis, MO 63106. The SLHA's Admissions and Continued Occupancy Policies can only be viewed online or by appointment. To scheduling a viewing appointment, please contact Naisha Tobias at (314) 286-4330 or by email at ntobias@slha.org.

All resident organizations are provided a copy of the Agency Plan.

ATTACHMENT #2

Section B.1 (b) – PHA Plan Update – Plan Elements Revised

Item 1 – Statement of Housing Needs

In accordance with HUD Requirements, the PHA is required to assess the housing needs within the community as a part of its Annual Plan. Based on available data, the PHA is required to make reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The PHA to rate the impact of the following factors on the housing needs of families using a scale of 1 to 5 with 1 considered "no impact," and 5 being "severe impact."

- **Affordability** - the impact of rent burden (i.e., rent comprising more than 30 percent of income) or severe rent burden (i.e., rent comprising more than 50 percent of income);
- **Supply** - the impact of the shortage of units available for occupancy;
- **Quality** - the prevalence of units in substandard physical condition;
- **Accessibility** - the availability of units that are accessible for persons with mobility impairments;
- **Size** - considers any mismatch between the units available and family sizes; and
- **Location** – the extent to which the supply of units' available limits housing choices for families to particular locations, notably areas of poverty/minority concentration.

SLHA's Statement of Housing needs is included on the following table: *Housing Needs of Families in the Jurisdiction by Family Type*. In order to maintain consistency, the same methodology was used for 2022, as in previous, although the data is limited in some categories and may not reflect current market conditions. The St. Louis Housing Authority is located in a jurisdiction identified by HUD to have significant rental market fluctuations and has been approved for an increase in payment standards for Housing Choice Vouchers up to 120 percent of the FMR in accordance with PIH Notice 2022-30. In addition, the jurisdiction is currently experiencing many affordable housing challenges due to ongoing effects from COVID, including, but not limited to, a lack of affordable units, increasing housing costs and increasing construction costs.

Housing Needs of Families in the Jurisdiction by Family Type

Family Type	Overall	Affordability	Supply	Quality**	Accessibility	Size	Location
Income <= 30% of HAMFI	34,335	4	*	4	*	*	*
Income >30.1% but <=50% of HAMFI	22105	4	*	4	*	*	*
Income >50.1% but <80% of HAMFI	26,845	2	*	2	*	*	*
Elderly	35,175	2	*	2	*	*	*
Population with Disabilities	94,000	*	*	3	*	*	*
Caucasian, Non-Hispanic	67,925	2	*	1	*	*	3
African American, Non-Hispanic	61,680	3	*	2	*	*	5
Asian or Pacific Islander, Non-Hispanic	3,880	3	*	2	*	*	4
Hispanic	4,274	3	*	2	*	*	4
Other, Non-Hispanic	2,045	3	*	2	*	*	*

Notes: Numbers reflect population or households, renters and homeowners; Elderly = 62+; Grading was established such that 1=0-20%, 2=20.1-40%, 3=40.1-60%, 4=60.1-80%, 5=80.1-100%; Data taken from AFFH version 0006, Map 6, "housing problems" tables 1, 9 & 12 and CHAS data 2016-2020, tables 5, 6, 7, 9, & summary table.

*__There is no data available to make determinations in the indicated categories.__

In addition to the data included in the table, the St. Louis Affordable Housing Report Card (2021) had several key findings related to the Housing Needs included in their recent report (https://www.affordablestl.com/). Some of the key findings include a lack of affordable housing for extremely low-income individuals (at or below 30% of AMI). In St. Louis City and County, there is a gap of approximately 35,000 affordable units needed—28,000 1-bedrooms, 7,000 2-bedrooms, and 1,900 3-bedroom. The report also issued Affordable Housing Grades for different groups. The following groups are also are also included in the Housing Needs of Families Table for St. Louis City and County:

Affordable Housing Grades – Select Groups

St. Louis Affordable Housing Report Card (2021)

All Households	C
Households with Income from 0-30% AMI	F
Households with Income from 31-50% AMI	F
Households with Income from 51-80% AMI	D
White Households	C
Black Households	F

ATTACHMENT #3

Section B.1 (b) – PHA Plan Update – Plan Elements Revised

Item 2–Deconcentration and Other Policies that Govern Eligibility, Selection & Admissions

Administrative Plan (Section 8 Housing Choice Program) - Changes
Admissions and Continued Occupancy Policy (ACOP) – Matrix of Changes

- Section 8/Housing Choice Voucher Program: *Revisions since last Annual Plan Submission:*

  Administrative Plan

  Revisions to the Administrative Plan – Matrix provides summary of changes (Attachment 3A).

  HUD PIH Notice PIH 2023-27 (Attachment 3B).
  Implementation of Sections 102 and 104 of the Housing Opportunity through the Modernization Act of 2016 (HOTMA).

- Public Housing: - St. Louis Housing Authority's Admissions and Continued Occupancy Policy (ACOP) contains the provisions for Eligibility, Selection and Admissions Policies, including Deconcentration, and Wait List Procedures for Public Housing Residents. *Revisions since last Annual Plan Submission:*

  Admissions and Continued Occupancy Policy (ACOP)

  Revisions to the ACOP, a component of the Agency Plan, have been made and therefore, are subject to public review and comment. The ACOP comment period is concurrently with this plan. The ACOP is under a separate cover and not an attachment to this plan update.

  Revisions to the ACOP – Matrix provides summary of changes (Attachment 3C).

  Victims of Domestic Violence Waiting List Preference: The revision to the ACOP also include a new preference for victims of domestic violence (in addition to existing preferences for Employed, Elderly, Disabled, Homeless, Veterans, Job Training/ Education Program). SLHA anticipates determining the point value for the new preference upon completion of the public comment and review period.

  Income Limits Chart: (ACOP Appendix #2) - HUD annually revises the Income Limits to adjust to the average median income levels (Attachment 3D).

Flat Rent Comparables: (ACOP Appendix #3) – SLHA annually revises the Flat Rent Comparables to adjust rent limits comparable to local area rents (Attachment 3E). (Reference Attachment 5).

HUD PIH Notice PIH 2023-27 (Attachment 3F).
The ACOP changes include implementation of Sections 102 and 104 of the Housing Opportunity through the Modernization Act of 2016 (HOTMA).

Site Based Waiting Lists: Currently, SLHA has 25 site-based waiting lists. SLHA plans to merge the waiting list for Armand and Ohio (MO00100038) with the larger Southside Scattered Sites Waiting List (MO00100038). All Armand and Ohio applicants will be contacted and once the list is exhausted it will not be reopened. Going forward, all new applicants will be pulled from the Southside Scattered Sites waiting list. Once this process has been completed, SLHA will have 24 site-based waiting lists.

Waiting Lists Openings: - In FY 2024, SLHA expects to re-open the Waiting Lists for several SLHA properties. Reference attached table containing all Waiting Lists by Locations (Attachment 3G).

Administrative Plan Changes/Additions 2024

Chapter	Current	Change/Addition/Comment	Page
Chapter 12 Income Determination [24 CFR Part 5, Subpart F] **12.2.1 Anticipating Annual Income**	Anticipating Annual Income General Requirements for Annual Income Annual Income means all amounts, monetary or not, which: Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and Are not specifically excluded Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access	(a) Annual income includes, with respect to the family: (1) All amounts, not specifically excluded in the exclusion section, received from all sources by each member of the family who is 18 years of age or older or is the head of household or spouse of the head of household, plus unearned income by or on behalf of each dependent who is under 18 years of age, and (2) When the value of net family assets exceeds $50,000 (which amount HUD will adjust annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers) and the actual returns from a given asset cannot be calculated, imputed returns on the asset based on the current passbook savings rate, as determined by HUD.	12-1

Administrative Plan Changes/Additions 2024

12.3 Income Included in Annual Income	12.3.4 Assets Annual income includes the interest, dividends and other net income of any kind from real or personal property. For most types of assets, SLHA will determine the value of the asset in order to compute income from the asset. As is true for all sources of income, SLHA will use other than current circumstances to anticipate income when: (1) an imminent change in circumstances is expected, (2) it is not feasible to anticipate a level of income over 12 months or (3) SLHA believes that past income is the best indicator of anticipated income. For example, if a family member owns real property that typically receives rental income, but the property is currently vacant, SLHA can take into consideration past rental income, along with the prospects of obtaining a new tenant. Anytime current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. The family may present information and documentation to SLHA to show why the asset income determination does not represent the family's anticipated asset income. 12.3.4.1 Valuing Assets The calculation of asset income sometimes requires SLHA to make a distinction between an asset's market value and its cash value. The market value of an asset is its worth (e.g., the amount a buyer would pay for real estate or the balance in an investment account). The cash value of an asset is its market value, less all reasonable amounts that would be incurred when converting the asset to cash. Reasonable costs that would be incurred when disposing of an asset include, but are not limited to, penalties for premature withdrawal, broker and legal fees, and	When the value of net family assets exceeds $50,000 (which amount HUD will adjust annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers) and the actual returns from a given asset cannot be calculated, imputed returns on the asset based on the current passbook savings rate, as determined by HUD.	

	settlement costs incurred in real estate transactions.		
12.6 Earned Income Disallowance for Persons with Disabilities	The Earned Income Disregard (EID) is the disallowance for increases in income as a result of employment of individual family members. SLHA will not increase the monthly rental payment of an eligible family because of increased income due to employment during the 12-month period beginning on the date in which the employment is commenced. EID encourages people with disabilities to enter the workforce by not including the full value of increases in earned income for a period of time.	12.6 EID will be available only to families that are eligible for and already participating in the program on the effective date of the final rule; no new families may be added. • Families may continue receiving the benefits of EID until the allowed time frame expires. »Within 2 years from the effective date of the final rule implementation (01/01/26), no family will receive the EID benefit. • Families eligible to receive the Jobs Plus Earned Income Disregard pursuant to the FY2022 NOFO or earlier may continue to receive the disregard under the terms of the NOFO.	12-13

Administrative Plan Changes/Additions 2024

Chapter 14 Adjustments to Annual Income **14.1 Overview**		**14.2 De Minimis Errors** A de minimis error is defined as an error that results in a difference in the determination of a family's adjusted income of $30 or less per month. This change from defining a de minimis error as a percentage error will enable a PHA or owner to make de minimis determinations on a case-by-case basis rather than having to do a full portfolio review to determine if a PHA, owner, or grantee exceeds the threshold. In addition, using a dollar amount instead of a percentage will make de minimis errors easier to calculate. $360.00 in annual adjusted income.	14-1
Chapter 14 Adjustments to Annual Income **14.1 Medical Expenses Deduction**	SLHA will deduct unreimbursed medical expenses from the annual income to the extent that, in combination with any disability assistance expenses, they exceed three percent of annual income. The medical expense deduction is only for families in which the head, spouse or co-head is at least 62 or is a person with disabilities. If a family is eligible for a medical expense deduction, the medical expenses of all family members are included in the determination of the amount of the deduction.	The Medical and Health Expense Deduction is the sum of the following, to the extent it exceeds 10% of annual income: • Unreimbursed health and medical care expenses for elderly or disabled families. • Unreimbursed reasonable attendant care and auxiliary apparatus expenses for each member of the family who is a person with a disability, to the extent necessary to enable any member of the family, including the person with a disability, to be employed. »This deduction may not exceed the combined earned income of the adult family members who were able to work.	14-1

Administrative Plan Changes/Additions 2024

Chapter 14 Adjustments to Annual Income **14.3 Elderly or Disabled Family Deduction**		**CHANGE:** '$400 TO $525' $525 for any elderly family or disabled family, which amount will be adjusted by HUD annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers, rounded to the next lowest multiple of $25	14-1
14.2 Dependent Deduction	SLHA will deduct $480 from the annual income for each dependent. A dependent is any family member other than the head, spouse or co-head who is under the age of 18 or who is 18 or older and is a person with disabilities or a full-time student. Foster children, foster adults and live-in aides are never dependents.	SLHA will deduct $480 from the annual income for each dependent. A dependent is any family member other than the head, spouse or co-head who is under the age of 18 or who is 18 or older and is a person with disabilities or a full-time student. Foster children, foster adults and live-in aides are never dependents. The head of household, spouse, or co-head does not qualify for this deduction. $480 for each dependent, which amount will be adjusted by HUD annually in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers, rounded to the next lowest multiple of $25.	
14.7 Child Care Expense Deduction	SLHA will deduct reasonable expenses for childcare for the amount anticipated to be paid by the family for the care of children under 13 years of age during the period for which annual income is computed, but only where such care is necessary to enable a family member to actively seek employment, be gainfully employed or to further his or her education and only to the extent such amounts are not reimbursed. In the case of childcare necessary to permit employment, the amount deducted shall not exceed the amount of	Any reasonable child care expenses necessary to enable a member of the family to be employed, further his or her education, or look for work. • No threshold amount	14-14

	employment income that is included in annual income. Childcare expenses do not include child support payments made to another on behalf of a minor who is not living in an assisted family's household. However, childcare expenses for foster children that are living in the assisted family's household are included when determining the family's childcare expenses.		
14.8 Financial hardship exemption for unreimbursed health and medical care expenses and reasonable attendant care and auxiliary apparatus expenses.		**14.8.1 Phased-in relief** This paragraph provides financial hardship relief for families affected by the statutory increase in the threshold to receive health and medical care expense and reasonable attendant care and auxiliary apparatus expense deductions from annual income. **14.8.2 Eligibility for relief** To receive hardship relief the family must have received a deduction from annual income because their sum of expenses exceeded 3 percent of annual income as of January 1, 2024. **14.8.3 Form of relief** The family will receive a deduction totaling the sum of the expenses that exceed 5 percent of annual income. Twelve months after the relief is provided, the family must receive a deduction totaling the	14-4

		sum of expenses that exceed 7.5 percent of annual income. Twenty-four months after the relief is provided, the family must receive a deduction totaling the sum of expenses that exceed ten percent of annual income and the only remaining relief that may be available to the family. A family may request hardship relief prior to the end of the twenty-four-month transition period. If a family making such a request is determined eligible for hardship relief, hardship relief under this paragraph ends and the family's hardship relief shall be administered as stated Financial relief is allowed for an elderly or disabled family or a family that includes a person with disabilities that is experiencing a financial hardship. **14.8.4 Eligibility for relief** To receive hardship relief under this a family must demonstrate that the family's applicable health and medical care expenses or reasonable attendant care and auxiliary apparatus expenses increased or the family's financial hardship is a result of a change in circumstances (as defined by the responsible entity) that would not otherwise trigger an interim reexamination. Relief is available regardless of whether the family previously received deductions, is	

		currently receiving relief, or previously received relief. Form and duration of relief The family will receive a deduction for the sum of the eligible expenses that exceed 5 percent of annual income. The family's hardship relief ends when the circumstances that made the family eligible for the relief are no longer applicable or after 90 days, whichever comes earlier. However, responsible entities may, at their discretion, extend the relief for one or more additional 90-day periods while the family's hardship condition continues. Exemption to continue child care expense deduction A family whose eligibility for the child care expense deduction is ending may request a financial hardship exemption to continue the child care expense deduction. The responsible entity must recalculate the family's adjusted income and continue the child care deduction if the family demonstrates to the responsible entity's satisfaction that the family is unable to pay their rent because of loss of the child care expense deduction, and the child care expense is still necessary even though the family member is no longer employed or furthering his or her education. The hardship exemption and the resulting alternative adjusted income calculation must remain in	

		place for a period of up to 90 days. Responsible entities, at their discretion, may extend such hardship exemptions for additional 90-day periods based on family circumstances. **14.9 Hardship policy requirements** **14.9.1 Responsible entity determination of family's inability to pay the rent** SLHA must establish a policy on how it defines what constitutes a hardship; which includes determining the family's inability to pay the rent, for purposes of determining eligibility for a hardship exemption. **14.9.2 Family notification** SLHA must promptly notify the family in writing of the change in the determination of adjusted income and the family's rent resulting from the hardship exemption. The notice must also inform the family of when the hardship exemption will begin and expire or within 90 days or at such time as SLHA determines the exemption is no longer necessary.	

Administrative Plan Changes/Additions 2024

Chapter 16 Subsidy Standards **16.2 Determining Family Unit (Voucher) Size [24 CFR 982.402]**	For each family, SLHA determines the appropriate number of bedrooms under SLHA subsidy standards and enters the family unit size on the voucher that is issued to the family. The family unit size does not dictate the size of unit the family must actually lease, nor does it determine who within a household will share a bedroom/sleeping room. Generally, SLHA assigns one bedroom to two people within the following guidelines: ● Persons of different generations (other than spouses) and unrelated adults should be allocated a separate bedroom	For each family, SLHA determines the appropriate number of bedrooms under SLHA subsidy standards and enters the family unit size on the voucher that is issued to the family, within the following guidelines: ● Persons of different generations (other than spouses and partners) and unrelated adults should be allocated a separate bedroom	15-6
Chapter 17 Family Briefing and Voucher Issuance **17.5 Voucher Term, Extensions, and Suspensions** **1**	If an applicant family's voucher term or extension expires before the family has submitted a RFTA, the family is no longer eligible for assistance. If the family still desires assistance, the family must reapply when the waiting list is open.	If an applicant or participant family's voucher term or extension expires before the family has submitted a RFTA, the family is no longer eligible for assistance. If the family still desires assistance, the family must reapply when the waiting list is open.	17-5
Chapter 18 Request for Tenancy Approval **18.3 Requesting Tenancy Approval** **18.3.1 Documents Required for Tenancy Approval**	The unit owner and the family must submit the following documents to SLHA to begin the tenancy approval process. • Completed Request for Tenancy Approval (RFTA) – Form HUD-52517 • Owner/Agent Information Form • Proof of Property Ownership • Completed W-9 Form	The unit owner and the family must submit the following documents to SLHA to begin the tenancy approval process. • Completed Request for Tenancy Approval (RFTA) – Form HUD-52517 • Owner/Agent Information Form • Proof of Property Ownership • Completed W-9 Form	18-2

		● Certificate of Inspection (in City of St. Louis) ● Proof of paid real property taxes	

Chapter 19 Owners
 	
19.4 Owner Responsibilities
	● Enforcing family obligations under the lease
	  ● The owner must give SLHA a copy of any owner eviction notice at the same time the owner notifies the family.
	  ● The owner should provide timely notice to SLHA of serious or repeated violations of the lease by the family. SLHA may use such information to terminate assistance to the family or to take other appropriate action such as deny the family permission to move with continued assistance. While SLHA diligently attempts to enforce the family's obligations under the program, SLHA is not the owner's management agent and will not assume the duty of enforcing the owner's lease. Should the owner fail to timely notify SLHA of lease violations by the family, SLHA may, in its sole discretion, disregard the information provided by the owner. For purposes of this subsection, timely notification shall mean that the alleged lease violation has occurred within the immediately preceding 60 days of the notification to SLHA.
		● Enforcing family obligations under the lease
		  ● The owner must give SLHA a copy of any owner eviction notice at the same time the owner notifies the family.
		  ● The owner should provide timely notice to SLHA of serious or repeated violations of the lease by the family. While SLHA diligently attempts to enforce the family's obligations under the program, SLHA is not the owner's management agent and will not assume the duty of enforcing the owner's lease. Should the owner fail to timely notify SLHA of lease violations by the family, SLHA may, in its sole discretion, disregard the information provided by the owner. For purposes of this subsection, timely notification shall mean that the alleged lease violation has occurred within the immediately preceding 60 days of the notification to SLHA.
			19-3

Chapter 19 Owners **19.7 Change in Ownership**	A change in ownership requires execution of a new contract and lease. SLHA may approve the assignment of the HAP contract at the old owner's request. SLHA may approve the assignment, since they are a party to the contract. SLHA may deny approval of assignment of the contract for any of the reasons listed in this chapter. SLHA will process a change of ownership only upon the written request of the new owner and only if accompanied by documentation showing the transfer of title, recorded deed and the Tax Identification Number or Social Security number of the new owner. SLHA must receive a written request by the old owner in order to change the HAP payee and/or the address to which payment is to be sent.	Owners wishing to change ownership must obtain written consent from SLHA prior to assigning a HAP Contract to a new owner. The requirements relating to owner approvals set forth in this Administrative Plan also apply to changes in ownership. The new owner must provide all documentation requested by SLHA, including: • Owner/Agent Information Form • Proof of Property Ownership • Completed W-9 Form • Certificate of Inspection (in City of St. Louis) if current Certificate is not in SLHA's file • Proof of paid real property taxes Notice to Tenant(s) that ownership has changed and to whom rent should be paid The new owner must agree to be bound by and comply with the existing Lease and HAP Contract. If the new owner fails to provide SLHA with an acceptable written agreement that the new owner will comply with the existing Lease and HAP contract, the HAP Contract terminates with the effective date of the ownership change.	19-5

Administrative Plan Changes/Additions 2024

Chapter 19 Owners **19.3 Basic HCV Program Requirements**	19.3 Basic HCV Program Requirements Owners that wish to lease a unit to an eligible HCV family or to help the HCV family find a unit may use a web-based apartment locator service provide free of charge. SLHA maintains several computers in the lobby to provide HCV families with access to locator site.	**Remove this** "SLHA maintains several computers in the lobby to provide HCV families with access to locator site."	
Chapter 20 Housing Quality Standards and Inspections **20.1 Overview**		**CHANGE:** "annually" to "biennially"	19-6
Chapter 20 Housing Quality Standards and Inspections **20.5 Inspection Process Overview** **20.5.1 Types of Inspections**		**CHANGE:** "Annual Inspections" to "Biennial Inspections"	20-4

Administrative Plan Changes/Additions 2024

Chapter 20 Housing Quality Standards and Inspections **20.5 Inspection Process Overview** **20.5.3 Inspection Costs 24 CFR 982.405**	SLHA will not charge the family or owner for unit inspections. In the case of inspections of SLHA-owned units, SLHA may compensate the independent agency from ongoing administrative fees for inspections performed. SLHA and the independent agency will not charge the family any fee or charge for the inspection.	SLHA will not charge the family for any initial inspection or reinspection of the unit. SLHA will not charge the owner for the inspection of the unit prior to the initial term of the lease or for a first inspection during assisted occupancy of the unit. However, SLHA will charge owners $25 for a reinspection if an owner notifies SLHA that a repair has been made or the allotted time for repairs has elapsed and a reinspection reveals that any deficiency cited in the previous inspection that the owner is responsible for repairing pursuant to §982.404(a) was not corrected. The owner may not pass this fee along to the family.	20-5
Chapter 20 Housing Quality Standards and Inspections **20.8 Special/Complaint Inspections**		**CHANGE:** "annual" to "biennial"	20-6
Chapter 20 Housing Quality Standards and Inspections **20.9 Special Needs/Medical Aid Inspections**		**CHANGE:** "annual" to "biennial"	20-6

Administrative Plan Changes/Additions 2024

Chapter 20 Housing Quality Standards and Inspections **20.10 Quality Control Inspections**		**CHANGE:** "annual" to "biennial"	20-6
Chapter 20 Housing Quality Standards and Inspections **20.12 Owner Responsibility**	The owner is responsible for maintaining the unit in accordance with HQS that are not identified as family responsibility. The owner is not responsible for vermin infestation if caused by the family's living habits. However, if such infestation is serious and repeated, it may be considered a lease violation and the owner may evict for serious or repeated violation of the lease. The inspector will make a determination of owner or family responsibility during the inspection. If the owner fails to maintain the dwelling, SLHA must take prompt and vigorous action to enforce the owner's obligations.	The owner is responsible for maintaining the unit in accordance with HQS that are not identified as family responsibility. The inspector will make a determination of owner or family responsibility during the inspection.	20-8
Chapter 20 Housing Quality Standards and Inspections **20.12 Owner Responsibility** **20.12.1 HAP Abatement**	If the owner fails to request a re-inspection before the time period for making repairs expires, a Notice of Abatement will be sent to the owner. The abatement will be effective the date after the due date that repairs were to be made. The notice of abatement shall state that the family is not responsible for SLHA's portion of rent that is abated. If no re-inspection request is received by the 16th day of abatement, SLHA may issue a voucher to the family.	If the owner fails to request a re-inspection before the time period for making repairs expires, a Notice of Abatement will be sent to the owner. The abatement will be effective the first of the month following the deadline to cure the cited deficiencies that are not identified as family responsibility. The notice of abatement will state that the family is not responsible for SLHA's portion of rent (i.e. the HAP) that is abated. If no re-inspection request is received by the 16th day of abatement, SLHA may issue a voucher to the family and terminate the HAP Contract.	20-8

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Chapter 20 Housing Quality Standards and Inspections **20.12 Owner Responsibility** **20.12.2 HAP Contract Termination**	If the owner is responsible for repairs and fails to correct all the deficiencies cited prior to the end of the abatement period, the owner will be sent a HAP Contract Termination Notice. Prior to the effective date of the termination, the abatement will remain in effect. If repairs are completed before the effective termination date, SLHA may rescind the termination if the family chooses to remain in the unit. Only one HQS inspection will be conducted after the termination notice is issued.	If the owner is responsible for repairs and fails to correct all the deficiencies cited prior to the end of the abatement period, the owner will be sent a HAP Contract Termination Notice. The HAP Contract termination will be effective at the end of the calendar month that follows the month in which SLHA gives notice of the termination to the owner. If repairs are completed before the effective termination date, SLHA may rescind the termination if the family chooses to remain in the unit. Only one HQS inspection will be conducted after the termination notice is issued.	20-8
Chapter 23 Housing Assistance Payment Contract, Lease and Payments to Owners **23.3 Execution of the HAP Contract**	SLHA will not pay any housing assistance payment to the owner until the HAP contract has been executed. SLHA will make its best effort to ensure that the HAP contract is executed before the beginning of the lease term. Regardless, the HAP contract must be executed no later than 60 calendar days from the beginning of the lease term. If the HAP contract is executed during the period of 60 calendar days from the beginning of the lease term, SLHA will pay housing assistance payments after execution of the HAP contract (in accordance with the terms of the HAP contract) to cover the portion of the lease term before execution of the HAP contract (a maximum of 60 days).	When the process for requesting tenancy approval is completed, SLHA will notify the owner and the family of the approval or disapproval of the tenancy. If SLHA determines that all applicable program requirements have been met and approves the tenancy, SLHA will prepare the HAP contract. SLHA will compare information in Part A of the HAP Contract to the lease, ensuring that the tenant name, unit address, household composition, term of the lease, and initial rent to owner are correct. SLHA will enter the amount of the housing assistance payment on the HAP contract. After the family and owner execute the lease, the owner and SLHA will execute the HAP contract. The effective date of the HAP contract is the same as the effective date of the lease.	23-1

		For families that are leasing in place, the family and owner must execute a new lease to meet the requirement that the effective date of the HAP contract is the same date as the effective date of the lease. The owner or owner's representative must execute the HAP Contract before SLHA will execute it. SLHA cannot make any housing assistance payments to the owner until the HAP contract has been executed. The owner and SLHA must execute the HAP contract no later than sixty (60) calendar days from the beginning of the lease term. If the HAP Contract is not executed within that 60-day period, the HAP Contract is void, and SLHA cannot make any housing assistance payments to the owner. It is considered a best practice to execute the HAP contract prior to or as close to the beginning of the lease term as possible. If the HAP contract is executed after the beginning of the lease term but within the 60-day grace period, the initial housing assistance payment will include the retroactive amount due to the owner from the effective date of the lease and HAP contract.	
Chapter 24 Reexaminations 24.1 Annual Reexaminations 24.2.1	Annual Activities SLHA must conduct three activities on an annual basis. These activities will be coordinated whenever possible: Reexamination of Income and Family Composition HQS Inspection Review of housing assistance payment amount for possible rent adjustment	Annual Activities SLHA must conduct two activities on an annual basis. These activities will be coordinated whenever possible: ● Reexamination of Income and Family Composition ● Review of housing assistance payment amount for possible rent adjustment	24-1

Chapter 24 Reexaminations **24.2. Annual Reexaminations** **24.2.3 Notification of and Participation in the Annual Reexamination Process**	Families generally are required to participate in an annual reexamination interview, which must be attended by the head of household, spouse or co-head and family members 18 years of age or older. If participation in an in-person interview poses a hardship because of a family member's disability, SLHA may, as a reasonable accommodation, arrange for the reexamination to be conducted by home visit or by mail. Notification of annual reexamination interviews will be sent by first-class mail and will contain the date, time and location of the interview. In addition, it will inform the family of the information and documentation that must be brought to the interview. If the family is unable to attend a scheduled interview, the family should contact SLHA in advance of the interview to schedule a new appointment. If a family does not attend the scheduled interview, SLHA will send a second notification with a new interview appointment time. If a family fails to attend two scheduled interviews without SLHA approval or if the notice is returned by the post office with no forwarding address, a notice of termination with an offer for an informal hearing will be sent to the family's address on record.	SLHA will send the first notice of reexamination by U.S. Mail first class to the families' last known address 120 calendar days before the families' anniversary date. The notice of annual reexamination will contain the recertification packet, a list of required documentation, and a date by which the information must be returned to the PHA. If a family fails to return the required information by the deadline stated in the notice, or if the notice is returned by the post office with no forwarding address, a notice of intent to terminate the family's housing assistance will be sent to the family's last known address.	24-1

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Chapter 24 Reexaminations **24.2. Annual Reexaminations** **24.2.4 Conducting Annual Reexaminations**	As part of the annual reexamination process, families are required to provide updated information to SLHA regarding the family's income, expenses and composition. Families will be asked to bring all required information (as described in the reexamination notice) to the reexamination appointment. The required information will include a SLHA-designated reexamination form, an Authorization for the Release of Information/Privacy Act Notice, as well as supporting documentation related to the family's income, expenses and family composition. Any required documents or information that the family is unable to provide at the time of the interview must be provided within 10 business days of the interview. If the family does not provide the required documents or information within the required time frame (plus any extensions), the family will be sent a notice of termination. The information provided by the family generally must be verified in accordance with SLHA policies. Unless the family reports a change or the agency has reason to believe a change has occurred in information previously reported by the family, certain types of information that are verified at admission typically do not need to be re-verified on an annual basis. These include: Legal identity Age Social Security numbers A person's disability status Citizenship or immigration status. If adding a new family member to the unit causes overcrowding according to the HQS, SLHA will issue the family a new voucher and the family must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, SLHA must terminate the existing HAP contract in accordance with its terms.	As part of the annual reexamination process, families are required to provide updated information to SLHA regarding the family's income, expenses and composition. Families will be asked to provide all required information (as described in the reexamination notice) to SLHA by the deadline stated in the reexamination notice. In accordance with HUD recommended practices (Notice PIH 2012-28], SLHA will also ask whether any member of the household is subject to a lifetime sex offender registration program in any state. SLHA will verify this information using the Dru Sjodin National Sex Offender Database and/or other official federal, state, and local resources and document this information in the same manner as at admission. If the family does not provide the required documents or information within the required time frame (plus any extensions), the family will be sent a notice of termination. The information provided by the family generally must be verified in accordance with SLHA policies. Unless the family reports a change or the agency has reason to believe a change has occurred in information previously reported by the family, certain types of information that are verified at admission typically do not need to be re-verified on an annual basis. These include: ● Legal identity	24-2

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		• Age • Social Security numbers • A person's disability status • Citizenship or immigration status If adding a new family member to the unit causes overcrowding according to the HQS, SLHA will issue the family a new voucher and the family must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, SLHA must terminate the existing HAP contract in accordance with its terms.	
Chapter 24 Reexaminations **24.2. Annual Reexaminations** **24.4.2 Processing the Interim Reexamination** **24.4.2.1 Method of Reporting**	The family may notify SLHA of changes either orally or in writing. If the family provides oral notice, SLHA may also require the family to submit the changes in writing. Generally, the family will not be required to attend an interview for an interim reexamination. However, if SLHA determines that an interview is warranted, the family may be required to attend. Based on the type of change reported, SLHA will determine the documentation the family will be required to submit. The family must submit any required information or documents within 10 business days of receiving a request from SLHA. This time may be extended for good cause with SLHA approval. SLHA will accept required documentation by mail, fax or in person.	The family may notify SLHA of changes either orally or in writing. If the family provides oral notice, SLHA may also require the family to submit the changes in writing. Based on the type of change reported, SLHA will determine the documentation the family will be required to submit and request that documentation in writing. The family must submit any requested information or documents within ten (10) business days of receiving a written request from SLHA. The 10-day period may be extended for good cause with SLHA approval. SLHA will accept required documentation by mail, fax, email, or in person.	24-6

ATTACHMENT #3B

Section B.1 (c) – PHA Plan Update – Plan Elements Revised

Item 2–Deconcentration and Other Policies that Govern Eligibility, Selection & Admissions

Administrative Plan (Section 8 Housing Choice Program) - Changes
Admissions and Continued Occupancy Policy (ACOP) – Matrix of Changes

HUD PIH Notice PIH 2023-27
Implementation of Sections 102 and 104 of the Housing Opportunity through the Modernization Act of 2016 (HOTMA).

REFERENCE ATTACHMENT #3F

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

Chapter	Current	Change/Addition/Comment
Chater 4 Program Administration **4.5 Record Keeping** **4.5.4 Privacy Act Requirements**	Applicants and residents, including all adults in the household, are required to sign a consent form, HUD-9886, Authorization for Release of Information.	Applicants and residents, including all adults in the household, are required to sign a consent form, HUD-9886-A, Authorization for Release of Information.
Chapter 6 Tenant Selection **6.5 Waiting List Preferences**	SLHA has established a preference system for admission to its public housing program. SLHA uses the following local preference system: • Employed, elderly or disabled • Enrolled in or recently graduated from a job training or educational program • Homeless • Veteran	SLHA has established a preference system for admission to its public housing program. SLHA uses the following local preference system: • Employed, elderly or disabled • Enrolled in or recently graduated from a job training or educational program • Homeless • Veteran • Victims of Domestic Violence
Chapter 6 Tenant Selection **6.5 Waiting List Preferences** **6.5.1 Employed, Elderly, Disabled, Veteran or Homeless Preference**	Employed, Elderly, Disabled, Veteran or Homeless Preference	<u>***Revise Section numbering to create three subsections. No other changes to this section</u> **6.5.1 Employed, Elderly, Disabled, Preference** **6.5.2 Veteran Prefence** **6.5.3 Homeless Preference**

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

Chapter 6 Tenant Selection **6.5 Waiting List Preferences** **6.5.4 Victims of Domestic Violence Preference**		*****ADD NEW SECTION/PREFERENCE** **Victims of Domestic Violence Preference** To qualify for this preference, an applicant must present evidence that the family has been displaced as a result of fleeing violence in the home. Families are also eligible for this preference if there is proof that the family is currently living in a situation where they are being subjected to or victimized by violence in the home. Suitable evidence can be provided from law enforcement officials or social service agencies that have adequate knowledge of the family's living situation
Chapter 6 Tenant Selection **6.6 Order of Selection**	**Pt. Value Assigned - Criteria** 20 - Employed, Elderly or Disabled 15 - Enrolled in or recently graduated from a job training or educational program 5 - Homeless 5 - A veteran	**Pt. Value Assigned - Criteria** 20 - Employed, Elderly or Disabled 15 - Enrolled in or recently graduated from a job training or educational program 5 - Homeless 5 - A veteran TBD – Victims of domestic violence
Chapter 6 Tenant Selectin **6.7 Verification of Local Preference**		*****ADD TO CURRENT SECTION** If, during the course of processing an application, it becomes evident that an applicant has falsified or otherwise misrepresented any facts about his/her current situation, history, or behavior in a way that affects eligibility, preferences, applicant selection criteria qualification, allowances, or rent, the application must be rejected.

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

Chapter 7 General Verification Requirements **7.2 Methods of Income and Adjustments to Income Verification** **7.2.3 EIV Verification**	EIV is the verification of income, before or during a family re-examination and after move-in, through an independent source that systematically and uniformly maintains income information in computerized form for a large number of individuals. Users are allowed to search for income records by head of household social security number, program type and/or by annual reexamination. The use of EIV is the mandatory income verification method if the information is available on the system.	SLHA must use HUD's Enterprise Income Verification (EIV) System to employment and income information at annual and streamlined reexaminations of family composition and income. Users are allowed to search for income records by head of household social security number, program type and/or by annual re-examination. The use of EIV is the mandatory income verification method if the information is available on the system. SLHA is required to use the following reports from the EIV System: • Debts Owed & Termination, • Deceased Tenants, • Existing Tenant Search, • Failed EIV Pre-Screening, • Failed SSI Identity Test, • Identity Verification, • Multiple Subsidy, • New Hires, No Income Report by HHA or SSA, • No Income Reported on 50058, • Summary of Household Information
Chapter 8 Eligibitliy for Admissions **8.5** Eligibility Restrictions Due to Family Assets [CFR 5.618(a), 24 CFR 5.618(a)(ii)]		*****ADD NEW SECTION** **Eligibility Restrictions Due to Family Assets [CFR 5.618(a), 24 CFR 5.618(a)(ii)]** Families are ineligible to receive assistance in the public housing program if their net family assets exceed $100,000 or if the family owns real property suitable for the family to live in. A family cannot receive benefits if they have "present ownership interest in, a legal right to reside in, and the effective legal authority to sell, based on state or local laws of the jurisdiction where the property is located, real property that is suitable for occupancy by the family as a residence."

		The restriction on owning real property does not apply to: • Property jointly owned with someone else, and occupied by the other owner who is not a member of the household receiving benefits. • A victim of domestic violence, dating violence, sexual assault, or stalking. • A family that is offering the property for sale A family that owns a property may show it is not "suitable for occupancy" if it: • Does not meet the disability-related needs for all members of the family. For example: physical needs, proximity to transit, need for additional bedrooms or space, etc. • Is not sufficient for the size of the family. • Is located so as to be a hardship for the family. For example: the location would bae a hardship for the family's commute to work or school • Is unsafe because of physical condition—unless issues can be "easily remedied" • Cannot be a residence per local or state laws. For example: a storefront zoned for commercial use only
Chapter 8 Eligibitliy for Admissions **8.6 Social Security Numbers [24 CFR 5.216 and 5.218]**	**Social Security Numbers [24 CFR 5.216 and 5.218]** .	**Social Security Numbers [24 CFR 5.216 and 5.218, 24 CFR 5.216(g)(1)]** *****ADD TO CURRENT SECTION** SLHA requires that each family member (excepting non-eligible family members in mixed families) provide their Social Security number (SSN) and proof that the SSN belongs to that person. If a member of the family is unable to provide a Social Security card or other evidence of their SSN, SLHA will accept a document stating the person's name and a declaration from the person stating 1) why they cannot obtain their Social Security card and 2) what their SSN is. If SLHA has accepted any declarations as evidence of a SSN, SLHA will review HUD's Enterprise Income

		Verification's (EIV) Failed SSA Identity Report monthly to quickly identify any participants whose identity is not verified.
Chapter 8 Eligibitliy for Admissions **8.7 Family Consent to Relase Information**	**Family Consent to Release of Information [24 CFR 5.230]** Each adult family member, and the head of household, spouse, life partner, or co-head, regardless of age, must sign form HUD-9886-A, Authorization for the Release of Information/Privacy Act Notice, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. SLHA's managing agent will deny admission to the program if any member of the applicant family fails to sign and submit the consent forms for obtaining information	**Family Consent to Release of Information [24 CFR 5.230]** Each adult family member, and the head of household, spouse, life partner, or co-head, regardless of age, must sign form HUD-9886-A, Authorization for the Release of Information/Privacy Act Notice, and other consent forms as needed to collect information relevant to the family's eligibility and level of assistance. SLHA's managing agent will deny admission to the program if any member of the applicant family fails to sign and submit the consent forms for obtaining information. At each annual or interim reexamination, if any family member turned 18 and has not yet signed the HUD-9886-A form they will be required to sign the HUD-9886-A form. The executed consent form (Form HUD-9886) will remain effective until the family is denied assistance, the assistance is terminated, or if the family provides written notification to the SLHA to revoke consent. Families have the right to revoke consent by notice to SLHA, however, revoking consent will result in termination or denial of assistance.

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

Chapter 11 Income Determination **11.2 Anticipating Annual Income** **11.2.2 Basis of Annual Income Projection**	**Basis of Annual Income Projection**	**Basis of Annual Income Projection [24 CFR 5.609(c)]** *****ADD TO CURRENT SECTION** For initial occupancy and interim reexaminations, SLHA must estimate the family income for the previous 12-month period using period using current income. For all annual reexaminations, SLHA must determine the family income for the previous 12-months, taking into account any redetermination for an interim reexamination and any accounted for income changes. SLHA will not be considered out of compliance for a "de minimis" error that results in a difference in the determination of a family's adjusted income $30 or less per month (or $360 in annual adjusted income)
Chapter 11 Income Determination **11.3 Income Included in Annual Income**	**Income Included in Annual Income**	**Income Included in Annual Income [24 CFR 5.609(a)]** *****ADD TO CURRENT SECTION** Annual income includes, with respect to the family: • All amounts, not specifically excluded, received from all sources by each member of the family 18 years or older, plus • Unearned income by or on behalf of each dependent who is under 18 years of age, and • Imputed returns on net family assets exceeding $50,000 (adjusted annually using the Consumer Price Index) when the value of the actual returns from a given asset cannot be calculated. Imputed returns are based on the current passbook savings rate, as determined by HUD.

Admissions and Continued Occupancy Policy (ACOP) Changes/Additions 2024

Chapter 11 Income Determination **11.3 Income Inclucde in Annual Income** **11.3.4 Assets**	**Assets** Annual income includes the interest, dividends and other net income of any kind from real or personal property. For most types of assets, SLHA will determine the value of the asset in order to compute income from the asset. As is true for all sources of income, SLHA will use other than current circumstances to anticipate income when an imminent change in circumstances is expected, it is not feasible to anticipate a level of income over 12 months, or SLHA believes that past income is the best indicator of anticipated income. For example, if a family member owns real property that typically receives rental income but the property is currently vacant, SLHA can take into consideration past rental income along with the prospects of obtaining a new tenant. Anytime current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. The family may present information and documentation to SLHA to show why the asset income determination does not represent the family’s anticipated asset income.	**Assets [24 CFR 5.603(b) “Net Family Assets” Para. (1), (3) and (4), 24 CFR 5.618(b)]** Annual income includes the interest, dividends and other net income of any kind from real or personal property. Net family assets include the net cash value of all assets owned by the family, after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of capital investment. For most types of assets, SLHA will determine the value of the asset in order to compute income from the asset. As is true for all sources of income, SLHA will use other than current circumstances to anticipate income when an imminent change in circumstances is expected, it is not feasible to anticipate a level of income over 12 months, or SLHA believes that past income is the best indicator of anticipated income. For example, if a family member owns real property that typically receives rental income but the property is currently vacant, SLHA can take into consideration past rental income along with the prospects of obtaining a new tenant. Anytime current circumstances are not used to determine asset income, a clear rationale for the decision will be documented in the file. The family may present information and documentation to SLHA to show why the asset income determination does not represent the family’s anticipated asset income. For documentation of net family assets under $50,000, the SLHA may accept self-certification from the family that the assets are under that amount. • Certification must include any expected income from the assets (actual returns only). • No further documentation is required by the SLHA for the net family asset restriction. • Assets must be verified every 3 years. For documentation of property ownership, SLHA may accept self-certification that the “family does not have any present ownership

		interest in any real property." If family declares a property and asks for an exemption because a family member is a victim of domestic violence, dating violence, sexual assault, or stalking: • SLHA must accept self-certification of the family member • SLHA will provide the family member with Form HUD 5380 Notice of Occupancy Rights under VAWA and Form HUD 5382 Certification of Domestic Violence, Dating Violence, Sexual Assault, or Stalking, and Alternate Documentation
Chapter 11 Income Determination **11.3.4.2 Income Excluded from Annual Income** **11.4.2 Lump-Sum Reciepts**		*****ADD TO CURRENT SECTION** Several types of lump-sum payment are specifically excluded from net family assets: • Any amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty owed to a family member, for an incident resulting in a disability • Federal tax refunds or refundable tax credits for a period of 12 months after receipt by the family
Chapter 11 Income Determination **11.3 Inclucde in Annual Income** **11.3.4 Assets** **11.3.4.3.Imputing Income from Assets**	**Imputing Income from Assets** When net family assets are $5,000 or less, SLHA will include in annual income the actual income anticipated to be derived from the assets. When the family has net family assets in excess of $5,000, SLHA will include in annual income the greater of the actual income derived from the assets or the imputed income. Imputed income from assets is calculated by multiplying the total cash value of all family assets by the current HUDestablished passbook savings rate.	**Imputing Income from Assets [24 CFR 5.609(a)]** In general, income from assets is considered income. If it is possible to determine the actual returns from an asset, SLHA should use that amount. If it is not possible to calculate an actual return on an asset, and: • the net family assets are $50,000 or less, the imputed income from that asset is excluded. • If the net family assets are over $50,000, SLHA will impute income for the asset based on the current passbook savings rate, as determined by HUD.

Chapter 11 Income Determination **11.3 Income Inclucde in Annual Income** **11.3.4 Assets** **11.3.4.8.1 Checking and Savings Accounts**		***__ADD TO CURRENT SECTION__** The value of retirement accounts recognized by the IRS (IE: IRA, 401(k), 401(b) and retirement plans for self-employed individuals) Family Self-Sufficiency (FSS) Accounts (FSS)Retirement, and the value of certain education or disability support savings accounts is excluded from net family income.
Chapter 11 Income Determination **11.3 Income Inclucde in Annual Income** **11.3.4 Assets** **Chapter 11 Income Determination** **11.3 Income Inclucde in Annual Income** **11.3.4 Assets** **11.3.4.8.3 Equity in Real Property or Other Capital Investments**		***__ADD TO CURRENT SECTION__** There are several exclusions where the value of the real property does not count towards net family assets • Real property that the family does not have the effective legal authority to sell in the jurisdiction in which the property is located (IE: property subject to a lawsuit may be legally restricted from sale) • Real property where the family has interest in land held in trust by Bureau of Indian Affairs • Real property where the family has equity in a manufactured home where the family receives assistance under 24 CFR 982 HCV • Real property where the family receives assistance under 24 CFR 982 (HCV homeownership participant)

Chapter 11 Income Determination **11.3 Income Inclucde in Annual Income** **11.3.4 Assets** **11.3.4.9.2 Non-Revocable Trusts**	In cases where a trust is not revocable by, or under the control of, any member of a family, the value of the trust fund is not considered an asset. Non-revocable trusts are excluded from net family assets. However, any income distributed to the family from such a trust is counted as a periodic payment or a lump-sum receipt, as appropriate.	In cases where a trust is not revocable by, or under the control of, any member of a family, the value of the trust fund is not considered an asset. Non-revocable trusts are excluded from net family assets. However, any income distributed to the family from such a trust is counted as a periodic payment or a lump-sum receipt, as appropriate.
Chapter 11 Income Determination **11.3 Income Inclucde in Annual Income** **11.3.4 Assets** **11.3.4.10 Retirement Accounts**	In order to correctly include or exclude as an asset any amount held in a company retirement or pension account by an employed person, SLHA must know whether the money is accessible before retirement. While a family member is employed, only the amount the family member can withdraw without retiring or terminating employment is counted as an asset. After a family member retires or terminates employment, any amount distributed to the family member is counted as a periodic payment or a lumpsum receipt, as appropriate, except to the extent that it represents funds invested in the account by the family member. The balance in the account is counted as an asset only if it remains accessible to the family member. IRA, Keogh and similar retirement savings accounts are counted as assets even though early withdrawal would result in a penalty.	Retirement account recognized by IRS IRA, 401(k), 401(b) and retirement plans for self-employed individuals are excluded from net family assets.

Chapter 11 Income Determination **11.3 Income Inclucde in Annual Income** **11.3.4 Assets** **11.3.4.11 Personal Property**	Personal property held as an investment, such as gems, coin collections, antique cars, etc., is considered an asset. In determining the value of personal property held as an investment, SLHA will use the family's estimate of the value. Generally, personal property held as an investment generates no income until it is disposed of. If regular income is generated (e.g., income from renting the personal property), the amount that is expected to be earned in the coming year is counted as actual income from the asset. Necessary items of personal property are not considered assets and are excluded from net family assets provided the combined total value does not exceed $50,000.Necessary personal property consists of only those items not held as an investment, and may include clothing, furniture, household furnishings, jewelry and vehicles, including those specially equipped for persons with disabilities.	Personal property held as an investment, such as gems, coin collections, antique cars, etc., is considered an asset. In determining the value of personal property held as an investment, SLHA will use the family's estimate of the value. Generally, personal property held as an investment generates no income until it is disposed of. If regular income is generated (e.g., income from renting the personal property), the amount that is expected to be earned in the coming year is counted as actual income from the asset. Necessary items of personal property are not considered assets and are excluded from net family assets provided the combined total value does not exceed $50,000.Necessary personal property consists of only those items not held as an investment, and may include clothing, furniture, household furnishings, jewelry and vehicles, including those specially equipped for persons with disabilities.
Chapter 11 Income Determination **11.4 Income Excluded for Annual Income** **11.4.1 Non-Recurring Income**	**Temporary, Nonrecurring, or Sporadic Income** Temporary, nonrecurring or sporadic income is not included in annual income. 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. Sporadic income includes temporary payments from the U.S. Census Bureau for employment lasting no longer than 180 days	**Non-Recurring Income** Non-recurring income is income that will not be repeated in the coming year based on information provided by the family. Some examples of non-recurring income include: • U.S. Census Bureau for employment income (relating to decennial census or the American Community Survey) lasting no longer than 180 days and not resulting in permanent employment. • Direct federal or state payments for economic stimulus or recovery. • State or federal refundable tax credits or state or federal tax refunds received directly at the time they are received directly by the family. • Gifts for significant life events or milestones (e.g., holidays, birthdays, wedding gifts, baby showers, anniversaries). • Non-monetary, in-kind donations, such as food, clothing, or toiletries, received from a food bank or similar organization. • Lump-sum additions to net family assets, including but not limited to lottery or other contest winnings

		Income received as an independent contractor, day laborer, or seasonal worker is NOT excluded from income, even if the source, date, or amount of the income varies.
Chapter 11 Income Determination **11.4 Income Excluded for Annual Income** **11.4.2 Children's Earnings**	**Children's Earnings** Employment income earned by children (including foster children) under the age of 18 years is not included in annual income.	**Minors Earned Income [24 CFR 5.609(b)(3)]** Employment income earned by children (including foster children) under the age of 18 years is not included in annual income.
Chapter 11 Income Determination **11.4 Income Excluded for Annual Income** **11.4.3 Certain Earned Income of Full-Time**	**Certain Earned Income of Full-Time Students** Students Earnings in excess of $480 for each full-time student 18 years old or older (except for the head, spouse, life partner or co-head) are not counted. To be considered "full-time," a student must be considered "full-time" by an educational institution with a degree or certificate program. Any student financial assistance not subject to inclusion is fully excluded from annual income, whether it is paid directly to the student or to the educational institution the student is attending.	**Certain Earned Income for full-time dependent students and financial aid for both full and part-time student** 11.4.3.1 Mandatory Deduction for Full-time Students 24 CFR 5.609(b)(14) Earnings in excess of $480 for each full-time student 18 years old or older (except for the head, spouse, life partner or co-head) are not counted. To be considered "full-time," a student must be considered "full-time by an educational institution with a degree or certificate program. The above deduction is for 2024 and subject to change as HUD generally revises the amount on annual basis. The latest amount, as established and approved by HUD, shall be applicable and is automatically incorporated into this policy as of the effective date of the newly established amount.

		11.4.3.2 Educational Savings Account 24 CFR 5.609(b)(10) Any amount in or from, or any benefits, income, or distributions from, any Coverdell educational savings account of or any qualified tuition program under IRS sections 529 and 530 shall be excluded from income 11.4.3.3 Student Financial Assistance 24 CFR 5.609(b)(9) Any other grant-in-aid, scholarship, or other assistance amounts an individual receives for the actual covered costs charged by the institute of higher education is excluded from a family's income. Exclusion applies equally to full and part-time students. 11.4.3.4 Title IV HEA Assistance 24 CFR 5.609(b)(9)(i) Any assistance under section 479B of the Higher Education Act of 1965, as amended, requires to be excluded from a family's income, referred to here as, "Title IV HEA Assistance." Title IV HEA Assistance includes, but is not limited to: • Bureau of Indian Affairs/ Education student assistance programs. Current examples include: The Higher Education Tribal Grant, and The Tribally Controlled Colleges or Universities Grant Program. • Federal Pell Grants • Teach Grants • Federal Work-Study Programs • Federal Perkins Loans • Income earned in employment and training programs under section 134 of the Workforce Innovation and Opportunity Act (WIOA), including: workforce investment activities for adults and workers dislocated as a result of permanent closure or mass layoff at a plant, facility, or enterprise, or a natural or other disaster that results in mass job dislocation, in order to assist such adults or workers in obtaining reemployment as soon as possible. • All assistance under Title IV of the HEA as well as Bureau of Indian Affairs student financial assistance, even assistance

		provided to students in excess of tuition and required fees or charges, is excluded from HUD income calculations. 11.4.3.5 Other Student Financial Assistance 24 CFR 5.609(b)(9)(ii) Other assistance, for both full and part-time students, that is not included under Title IV of the HEA or under Bureau of Indian Affairs student assistance programs. To qualify as excluded student financial assistance under this category, the aid must be: • Used for “actual covered costs” • Expressly to assist the student with the costs of higher education; • Expressly to assist a student who is not the head of household or spouse, with the reasonable and actual costs of housing while attending the institution of higher education and not residing in an assisted unit; • A grant or scholarship received from the federal government, a State, Tribe, or local government; or a private foundation registered as a nonprofit under 26 U.S.C. 501(c)(3); a business entity (such as corporation, general partnership, limited liability company, limited partnership, joint venture, business trust, public benefit corporation, or nonprofit entity); or an institution of higher education. The aid may be paid directly to the student or to the educational institution on the student’s behalf. However, any student financial assistance paid to the student must be verified by the SLHA as consistent with this section. Student financial assistance, excluded here, does not include: • Any assistance that is already excluded under Title IV of the HEA • Financial support provided to the student in the form of a fee for services performed (e.g., a work study or teaching fellowship that is not excluded as Title IV HEA Assistance). • Gifts, including gifts from family or friends; or

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		• Any amount of the scholarship or grant that, either by itself or in combination with HEA assistance exceeds the actual covered costs of the student.
Chapter 11 Income Determination **11.4 Income Excluded for Annual Income** **11.4.11 Additional Exclusions from Annual Income**	• Adoption Assistance payments in excess of $480 per adopted child	• Adoption assistance payments [24 CFR 5.609(b)(15)]
Chapter 11 Income Determination **11.4 Income Excluded for Annual Income** **11.4.12 Federally Mandated Income Exclusions [24 CFR 5.609(b)(22)**		*****ADD NEW SECTION** **Federally Mandated Income Exclusions [24 CFR 5.609(b)(22)** Amounts that HUD is required by federal statute to exclude as income for determining eligibility or benefits will be included in this section following publication by HUD in the Federal Register. As HUD issues subsequent notices this section will be updated with additional information.

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Chapter 11 Income Determination **11.4 Income Excluded for Annual Income** **11.4.13 Excluded Assets [25 CFR 5.603(b) "Net Family Assets" Para. (3) and (4)]**		*****ADD NEW SECTION** **Excluded Assets [25 CFR 5.603(b) "Net Family Assets" Para. (3) and (4)]** The Housing Opportunity Through Modernization Act of 2016 specifically excludes certain assets from the definition of net family assets. • Necessary items of personal property including but not limited to, Medical devices, vehicle for commuting, etc. • Non-necessary items of personal property if the combined total value does not exceed $50,000. For example, vintage baseball cards, recreational boat, coin collection, art so long as the total value is under the limit, etc. • Retirement account recognized by IRS IRA, 401(k), 401(b) and retirement plans for self-employed individuals • Real property that the family does not have the effective legal authority to sell in the jurisdiction in which the property is located. For example, property subject to a lawsuit may be legally restricted from sale. • Any amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty owed to a family member, for an incident resulting in a disability • The value of certain education or disability support savings accounts Under Internal Revenue Code sections 529, 529A, 530, "baby bond" accounts Coverdell accounts, tuition programs, any "baby bond" account created, authorized, or funded by Federal, state, or local government Real property Interest in Indian trust land Family has interest in land held in trust by Bureau of Indian Affairs Existing exclusion • Equity in a manufactured home where the family receives assistance under the Housing Choice Voucher Program (24 CFR 982) • Equity in property where the family receives assistance under the Housing Choice Voucher Program (24 CFR 982) HCV Homeownership Program

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		• Family Self-Sufficiency (FSS) accounts • Federal tax refunds or refundable tax credits for a period of 12 months after receipt by the family Earned Income Tax Credits (EITC) Trust Funds are not revocable by, or under the control of, any member of the family or household
Chapter 11 Income Determination **11.6 Earned Income Disallowance**	**Earned Income Disallowance [24 CFR 960.255 and Notice PIH 2016-05]**	**Earned Income Disallowance [24 CFR 960.255 and Notice PIH 2016-05]** *****ADD TO SECTION** EID is only available to families that are eligible for and already participating in the program as of January 1, 2021. After January 1, 2021, eligible families may continue to receive the benefits of EID until their 12-month period has expired. Effective January 1, 2026 no families will receive the EID benefit.
Chapter 11 Income Determination **11.6 Earned Income Disallowance** **11.6.6 Jobs Plus Earned Income Disregard (JPEID) – Clinton Peabody only**	**Jobs Plus Earned Income Disregard (JPEID) – Clinton Peabody only** SLHA will disallow all earned income from rent determinations for families participating in the Jobs-Plus Pilot Program at Clinton Peabody. The disregard applies to all earned income increases due to employment over the baseline income for the remaining term of the grant beginning on the date on which employment commenced. To qualify for JPEID, the family members must be enrolled in the Jobs-Plus program. There shall be no phase-in period for families participating in Jobs-Plus and upon completion of the grant, the family shall be required to provide 100% of the amount of the applicable total rent increase. The standard lifetime maximum 24-month	*****REMOVE SECTION**

	disallowance proscribed in 11.6.5 shall not apply to families participating in Jobs-Plus.	
Chapter 11 Income Determination **11.7 Determination of Income Using Other Means Tested Public Assistance (IE, "Safe Harbor" [24 CFR 5.609(c)(3]**		*****ADD SECTION** **Determination of Income Using Other Means Tested Public Assistance (IE, "Safe Harbor" [24 CFR 5.609(c)(3])** SLHA may determine the family's income prior to the application of any deductions based on income calculation information from other means-tested forms of federal public assistance programs or agencies, listed below, made within the previous 12-month period. SLHA will use third-party verification, which must include the family size and composition and state the family's annual income. The verification must be dated within the time frame specified for the type of verification, including within the previous 12-month period for purposes of the specified means-tested forms of federal public assistance. The family members listed in the third-party verification must match the family composition in the assisted unit. The annual income need not be broken down by family members nor income type. Given that annual income includes income earned from assets, when using Safe Harbor to verify a family's income, SLHA will not inquire as to a family's net family assets, nor the income earned from those assets except with respect to whether the family owns assets which exceed the asset limitation in 24 CFR § 5.618.

		If multiple determinations are available that meet all of the minimum verification criteria, SLHA will use the most recent determination (if completed more than 3 months apart). If determinations were completed within 3 months, SLHA will use them in the following order: 1) The Low-Income Housing Tax Credit program (26 U.S.C. 42). 2) The Supplemental Nutrition Assistance Program (42 U.S.C. 2011 et seq.). 3) The Special Supplemental Nutrition for Women, Infants, and Children (42 U.S.C. 1786). 4) The Temporary Assistance for Needy Families block grant (42 U.S.C. 601, et seq.). 5) Medicaid (42 U.S.C. 1396 et seq.). 6) Supplemental Security Income (42 U.S.C. 1381 et seq.). 7) The Earned Income Tax Credit (26 U.S.C. 32). If SLHA cannot obtain the required third-party verification, or if the family disputes the determination, the SLHA will calculate the family's annual income using the methods established in 5.609(c)(1) and (2) or in the applicable program regulations.
Chapter 12 Verifying Income **12.10 Income From Assets**	**Income from Assets**	**Income from Assets [24 CFR 5.603(b) and ("Net Family Assets" para. (2); 5.618(b)], 24 CFR 5.603(b)(3) and (4)]** SLHA will determine each family's net family assets at the time of admission and at annual and interim reexaminations. For new admissions, SLHA will determine net family assets and anticipated income earned from assets based solely on a family self-certification, provided that net family assets are equal to or less than $50,000. After a family's assets of $50,000 or less have been self-certified for two years in a row, at the next annual reexamination, SLHA will fully verify net family assets and anticipated income earned from assets. After fully verifying the family's net family assets, SLHA will resume accepting self-certification until the third annual reexam following the most recent full

		verification. If net family assets are greater than $50,000, assets will be fully verified in accordance with the methods detailed in this section. When calculating Net Family Assets, the PHA must include the value of non-necessary items of personal property if the combined value exceeds $50,000. When determining new family assets, SLHA will take the following steps: 1. Provide the family with a description of non-necessary personal property and ask the family to estimate the total value of their non-necessary personal property. If the family estimates that their non-necessary personal property is valued under $50,000 (as adjusted annually for inflation) then the SLHA will not ask the family to report the individual items of non-necessary personal property, except every third year when the SLHA is fully verifying all assets. 2. If the family's non-necessary personal property has a net value over $50,000, SLHA will ask the family to report a full list of their non-necessary personal property. SLHA will assess the list to determine if any of the items are necessary personal property. SLHA will make a determination as to each item identified, based on HUD (or SLHA) guidance, and if the item is determined to be necessary, or otherwise excluded from net family assets, like a retirement account, educational savings account, etc., it will be excluded from the family's net assets. SLHA will consider the following to be necessary items of personal property: • Any automobile regularly used by a member of the family to commute to work, school, or childcare • Any computer or electronic device (such as laptop, tablet, monitor, or cellphone) that is used by any family member to work, look for work, or study • Any item used for religious purposes (such as a historic book of scripture). • Any furniture used in the family's home

		• Jewelry or other keepsakes which hold religious or cultural value, or deep family significance. SLHA will consider the following to be non-necessary items of personal property: • Bank accounts and other financial investments (e.g., checking account, savings account, stocks/bonds) • Any automobile that is used purely for recreation (such as an RV or camping trailer) and not for any of the defined "necessary" uses, • Collectible items (such as sports cards or trading cards) that are not used for a work-related purpose by a family member SLHA may make case-specific determinations of other "necessary" items.
Chapter 12 Verifying Income **12.10 Income From Assets** **12.10.5 Assets Disposed of for Less than Fair Market Value (FMV) During Two Years Preceding Effective Date of Certification or Recertification**	SLHA will obtain the family's certification as to whether any member has disposed of assets for less than fair market value during the two years preceding the effective date of the certification or re-certification. If the family certifies that they have disposed of assets for less than fair market value, verification or certification is required that shows: all assets disposed of for less than FMV, the date they were disposed of, the amount the family received, and the market value of the assets at the time of disposition. Third party verification will be obtained wherever possible.	SLHA will obtain the family's certification as to whether any member has disposed of assets for less than fair market value during the two years preceding the effective date of the certification or re-certification. SLHA must include the value of any business or family assets sold for less than fair market value (including a disposition in trust, but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application or reexamination, in excess of the amount received. In the case of a sale as part of a separation or divorce settlement, the sale or other disposition will not be considered to have been for less than fair market value if the applicant or tenant receives other compensation not measurable in dollar terms. Negative equity in real property or other investments does not prohibit the owner from selling the property or other investments, so negative equity alone would not justify an exclusion from family assets. If the family certifies that they have disposed of assets for less than fair market value, verification or certification is required that shows: all assets disposed of for less than FMV, the date they were disposed of, the amount the family received, and the market value of the assets at the time of disposition. Third party verification will be obtained wherever possible.

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Chapter 12 Verifying Income **12.11 Zero Income Status**	**Zero Income Status** SLHA will check UIV sources and/or request information from third party sources to verify that certain forms of income such as unemployment benefits, TANF, SSI, etc., are not being received by families claiming to have zero annual income. Income of families claiming to have zero income will be reviewed at least every six months.	**Zero Income Status [24 CFR § 5.609(b)(24)(vi); 24 CFR §§ 5.657(c)(3); 960.257(b)(3); 982.516(c)(3); and 882.515(b)(3)]** SLHA will check UIV sources and/or request information from third party sources to verify that certain forms of income such as unemployment benefits, TANF, SSI, etc., are not being received by families claiming to have zero annual income. SLHA will no longer conduct zero income review for zero income families. Instead, SLHA will monitor zero income families in EIV to identify increases in income.
Chapter 13 Adjustments to Annual Income **13.1 Overview**	This chapter defines the allowable expenses and deductions to be subtracted from annual income to determine the family's adjusted annual income. SLHA will use the methods as set forth in this chapter to determine accurate adjustments to income to ensure that families are not paying more or less for rent than their obligation. SLHA must verify all adjustments to annual income. Verification requirements are provided in Chapters 7 and 14	This chapter defines the allowable expenses and deductions to be subtracted from annual income to determine the family's adjusted annual income. SLHA will use the methods as set forth in this chapter to determine accurate adjustments to income to ensure that families are not paying more or less for rent than their obligation. SLHA must verify all adjustments to annual income. Verification requirements are provided in Chapters 7 and 14. SLHA will not be considered out of compliance for a "de minimis" error that results in a difference in the determination of a family's adjusted income $30 or less per month (or $360 in annual adjusted income).
Chapter 13 Adjustments to Annual Income **13.2 Dependent Deduction**	**Dependent Deduction** SLHA will deduct $480 from the annual income for each dependent. A dependent is any family member other than the head, spouse, life partner or co-head who is under the age of 18 or who is 18 or older and is a person with disabilities or a full time student. Foster children, foster adults and live-in aides are never dependents.	**Dependent Deduction [24 CFR 5.611 (a)(1)-(a)(2)]** SLHA will deduct $480 from the annual income for each dependent. A dependent is any family member other than the head, spouse, life partner or co-head who is under the age of 18 or who is 18 or older and is a person with disabilities or a full time student. Foster children, foster adults and live-in aides are never dependents. The above deduction is for 2024 and subject to change as HUD generally revises the amount on annual basis. The latest amount, as established and approved by HUD, shall be applicable and is automatically incorporated into this policy as of the effective date of the newly established amount.

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Chapter 13 Adjustments to Annual Income **13.3 Elderly or Disabled Family Deduction**	**Elderly or Disabled Family Deduction** SLHA will deduct $400 from the annual income for any elderly or disabled family. An elderly family is a family whose head, spouse, life partner, co-head or sole member is 62 years of age or older. A disabled family is a family whose head, spouse, life partner, co-head or sole member is a person with disabilities. Only a single $400 will be taken per family.	**Elderly or Disabled Family Deduction [24 CFR 5.611 (a)(1)-(a)(2)]** SLHA will deduct $525 from the annual income for any elderly or disabled family. An elderly family is a family whose head, spouse, life partner, co-head or sole member is 62 years of age or older. A disabled family is a family whose head, spouse, life partner, co-head or sole member is a person with disabilities. Only a single $525 will be taken per family. The above deduction is for 2024 and subject to change as HUD generally revises the amount on annual basis. The latest amount, as established and approved by HUD, shall be applicable and is automatically incorporated into this policy as of the effective date of the newly established amount.
Chapter 13 Adjustments to Annual Income **13.4 Medical Expense Deduction**	**Medical Expenses Deduction** SLHA will deduct unreimbursed medical expenses from the annual income to the extent that, in combination with any disability assistance expenses, they exceed three percent of annual income. The medical expense deduction is only for families in which the head, spouse, life partner or co-head is at least 62 or is a person with disabilities. If a family is eligible for a medical expense deduction, the medical expenses of all family members are included in the determination of the amount of the deduction.	**Medical Expenses Deduction [24 CFR 5.611(a)(3)]** SLHA will deduct unreimbursed health and medical care expenses plus unreimbursed reasonable attendant care and auxiliary apparatus expenses to the extent that, the sum of expenses exceeds ten percent (10%) of annual income. The medical expense deduction is only for families in which the head, spouse, life partner or co-head is at least 62 or is a person with disabilities. If a family is eligible for a medical expense deduction, the medical expenses of all family members are included in the determination of the amount of the deduction.
Chapter 13 Adjustments to Annual Income **13.4 Medical Expense Deduction** **13.4.2 Hardship Exemptions for Medical Expenses Deductions**		*****ADD NEW SECTION** **13.4.2 Hardship Exemptions for Medical Expenses Deductions [24 CFR 5.611(c)(1) and 5.611(c)(2)]** There are two types of hardship exemptions to the ten (10%) percent threshold for deducting eligible medical expenses under Section 13.4. General Relief is for families that can demonstrate that the family's eligible medical increased, or the family's financial hardship is a result of a change in circumstances that would not otherwise trigger an interim

		reexamination. Phased-In Relief, is for families eligible for and taking the Medical Expense Deductions in effect prior to January 1, 2024. **13.4.2.1 General Relief** A family may request a hardship exemption for health or medical care expenses, reasonable attendant care, or auxiliary apparatus expenses. A family must demonstrate that their applicable expenses increased or they experienced a change in circumstances that resulted in a financial hardship, as defined below, that would not otherwise trigger an interim reexamination. A change in circumstances includes the need for new, qualifying, health/medical, reasonable attendant care and auxiliary apparatus expenses or an increase in the cost of qualifying expenses so that qualifying expenses exceed 5% of the family's annual income. This relief is available regardless of whether the family previously received health and medical deductions or is currently receiving, or previously received, a phased-in hardship exemption under Section 13.4.2.2 The exemption ends when the circumstances that made the family eligible for the exemption no longer apply or after 90 days, whichever comes earlier. If the family wishes to request a successive 90-day period for the exemption, they must make that request within 10 days of the end of the current eligibility period. SLHA must comply with the Health Insurance Portability and Accountability Act (HIPAA) (Pub. L. 104-191, 110 Stat. 1936) and the Privacy Act of 1974 (Pub. L. 93-579, 88 Stat. 1896) when requesting documentation to determine eligibility for a hardship exemption. SLHA may not request documentation beyond what is sufficient to determine anticipated health and medical care and/or reasonable attendant care and auxiliary apparatus costs or when a change in circumstances took place.

		SLHA will verify that: • The family member for whom the expense is incurred is a person with disabilities. • The expense permits a family member, or members, to work. • The expense is not reimbursed from another source. SLHA will accept written third-party documents provided by the family such as receipts, cancelled checks, billing statements or other evidence of payments. If family-provided documents are not available, SLHA will provide a third-party verification form directly to the care provider(s) requesting the needed information. If third-party verification is not possible, written family certification as to costs anticipated to be incurred and the anticipated period. **13.4.2.2 Phased-In Relief** Families who received the medical expense deduction based on their most recent income examination prior to January 1, 2024, will begin receiving the 24-month phased-in relief at their next annual or interim reexamination, effective October 1, 2021. Families who receive this phased-in relief will have eligible expenses deducted as follows: • 1st twelve months– in excess of 5% of annual income. • 2nd twelve months – in excess of 7.5% of annual income. • After 24 months – in excess of 10% threshold will phase in and remain in effect unless the family qualifies for general hardship relief. Once a family chooses to obtain General Relief, a family may no longer receive the phased-in relief.

Chapter 13 Adjustments to Annual Income **13.5 Disability Assistance Expenses Deduction** **13.5.1 Earned Income Limit on the Disability Assistance Expense Deduction**	The disability expense deduction is capped by the amount of earned income received by family members who are 18 years of age or older and who are able to work because of the expense. The earned income used for this purpose is the amount verified before any earned income disallowances or income exclusions are applied.	The disability expense deduction is capped by the amount of earned income received by family members who are 18 years of age or older and who are able to work because of the expense. The earned income used for this purpose is the amount verified before any income exclusions are applied.
Chapter 13 Adjustments to Annual Income **13.7.1.5 Hardship Exemption**		*****ADD NEW SECTION** **13.7.1.5 Hardship Exemption [24 CFR 5.611(a)(4)]** Families who are ineligible to continue to receive the child care expense deduction may be eligible for a hardship exemption if they are unable to pay rent due to the loss of a child care expense deduction. To qualify families must: • Already be receiving the childcare deduction. • Demonstrate that the loss of the deduction and that the lack of childcare would cause hardship. The exemption ends when the circumstances that made the family eligible for the exemption no longer apply or after 90 days, whichever comes earlier. If the family wishes to request a successive 90-day period for the exemption, they must make that request within 10 days of the end of the current eligibility period. Families must report changes to SLHA if the circumstances that made the family eligible for the child care deduction are longer applicable. If the family reports the change in circumstances within 30 days, any increase will be effective on the first of the month following 30 days' notice to the

		family. If a family fails to report a change within the required timeframe, then adjustment will be made retroactive to the date it would have been effective had the information been provided on a timely basis. The family will be responsible for any underpaid rent and may be offered a repayment agreement.
Chapter 13 Adjustments to Annual Income **13.8 Policy for Determination of the Family's Inability to Pay Rent**		*****ADD NEW SECTION** **13.8 Policy for Determination of the Family's Inability to Pay Rent [24 CFR 5.611(e)]** It is the policy of SLHA to offer general hardship relief for the regular health and medical expenses deduction and the child care deduction. Hardship includes the following situations: Child care: • A death has occurred in the family. In order to qualify under this provision, a family must describe how the death has created a need for child care. • A health/ medical issue in the family which has created the need for child care. In order to qualify under this provision, a family must describe how the health or medical issues have created a need for child care. A family is considered to have a hardship when: • The household's family share of total housing costs exceeds 35 percent of adjusted household income. • Or when the family would be evicted because it is unable to pay the tenant portion of the rent.

		Family health and medical expenses: • A change in circumstances includes the need for new, qualifying, health / medical, reasonable attendant care and auxiliary apparatus expenses or an increase in the cost of qualifying expenses so that qualifying expenses exceed 5% of the family's annual income. • For hardship conditions based on loss of income, the hardship condition will continue to be recognized until new sources of income are received that are at least equal to the amount lost. • For hardship conditions based upon hardship-related expenses, the minimum rent exemption will continue to be recognized until the cumulative amount exempted is equal to the expense incurred. • The family may receive a deduction of all eligible expenses exceeding 5% of their annual income. • The exemption ends when the circumstances that made the family eligible for the exemption no longer apply or after 90 days, whichever comes earlier.
Chapter 13 Adjustments to Annual Income **13.9 Additional (Permissive) Deductions**		*****ADD NEW SECTION** **13.9 Additional (Permissive) Deductions [24 CFR 5.611(b)]** In addition to deductions that SLHA is required by HUD to consider, SLHA may establish other "permissive" deductions. SLHA has opted not to use permissive deductions.

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Chapter 18 Rent Determination **18.2 Flat Rents and Family Choice of Rent** **18.2.5 Flat Rents and Earned Income Disallownace**	**Flat Rents and Earned Income Disallowance** Because the EID is a function of income-based rents, a family currently paying flat rent cannot qualify for the EID even if a family member experiences an event that would qualify the family for the EID. If the family later chooses to pay income-based rent, they would only qualify for the EID if a new qualifying event occurred. A family currently paying flat rent that previously qualified for the EID while paying incomebased rent and is currently within their 24 month period would have the 12 cumulative months of full (100 percent) and half (50 percent) exclusion continue while paying flat rent as long as the employment that is the subject of the exclusion continues, and the 24-month lifetime limit would continue uninterrupted. A family paying flat rent could therefore see a family member's 24-month lifetime limit expire while the family is paying flat rent.	***REMOVE SECTION
Chapter 18 Rent Determination **18.4 Prorated Rent for Mixed Families**	When the mixed family's TTP is greater than the maximum rent, SLHA will use the TTP as the mixed family TTP. Once a mixed family has exceeded the over-income limit for twenty-four (24) consecutive months, the family will have their tenancy terminated. In that event, the mixed family will pay their current, prorated rent amount during the 6-month period before termination.	When the mixed family's TTP is greater than the maximum rent, SLHA will use the TTP as the mixed family TTP. Once a mixed family has exceeded the over-income limit for twenty-four (24) consecutive months, the family will have their tenancy terminated in accordance with SHLA's policy for Over Income Families. In that event, the mixed family will pay their current, prorated rent amount during the 6-month period before termination.

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Chapter 20 Reexaminations **20.4 Interim Rexaminations**	**Interim Reexaminations**	**Interim Reexaminations [24 CFR §§ 960.257(b)(6); 982.516(c)(4); and 882.515(b)(4) - (b)(5)]**
Chapter 20 Reexaminations **20.5 Changes Affecting Income or Expenses**	**Changes Affecting Income or Expenses**	**Changes Affecting Income or Expenses [24 CFR 960.257(b), 982.516(c), 882.515(b)]**
Chapter 20 Reexaminations **20.5 Changes Affecting Income or Expenses** **20.5.1 SLHA-Initiated Interim Reexaminations**	SLHA-initiated interim reexaminations are those that are scheduled based on circumstances or criteria defined by SLHA. SLHA will conduct interim reexaminations in each of the following instances: • For families receiving the Earned Income Disallowance (EID), SLHA will conduct an interim reexamination at the start and conclusion of the second 12-month exclusion period (50% ease-in period) Revised June 22, 2023 20-6 Resolution No. 2968 • If the family has reported zero income, SLHA will conduct an interim reexamination every 6 months as long as the family continues to report that they have no income • If at the time of the annual reexamination, it is not feasible to anticipate a level of income for the next 12	SLHA-initiated interim reexaminations are those that are scheduled based on circumstances or criteria defined by SLHA. SLHA will conduct interim reexaminations in each of the following instances: • If the family has reported zero income, SLHA will conduct an interim reexamination every 6 months as long as the family continues to report that they have no income • If at the time of the annual reexamination, it is not feasible to anticipate a level of income for the next 12 months (e.g. seasonal or cyclic income), SLHA will schedule an interim reexamination to coincide with the end of the period for which it is feasible to project income • If at the time of the annual reexamination, resident-provided documents were used on a provisional basis due to the lack of third party verification, and third party verification becomes available, SLHA will conduct an interim reexamination

	months (e.g. seasonal or cyclic income), SLHA will schedule an interim reexamination to coincide with the end of the period for which it is feasible to project income • If at the time of the annual reexamination, resident-provided documents were used on a provisional basis due to the lack of third party verification, and third party verification becomes available, SLHA will conduct an interim reexamination • SLHA may conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a resident fraud complaint	• SLHA may conduct an interim reexamination at any time in order to correct an error in a previous reexamination, or to investigate a resident fraud complaint
Chapter 20 Reexaminations **20.5 Changes Affecting Income or Expenses** **20.5.2 Family-Initiated Interim Reexaminations** **20.5.2.1 Required Reporting**	Families are required to report all increases in income including new employment, within 30 days of the date the change takes effect.	Families are required to report all increases in income including new employment, within 30 days of the date the change takes effect. Depending on the anticipated change, SLHA will take the following action: • If SLHA anticipates a family's adjusted income will decrease by greater than 10%, SLHA must conduct an interim reexamination • If SLHA anticipates a family's adjusted income will decrease by less than 10%, then SLHA may decline the request for reexamination since no reexamination is required. • If SLHA anticipates a family's adjusted income will increase by greater than 10% SLHA must conduct an interim reexamination. SLHA may decline to conduct an interim reexamination if the increase occurred within three months to a regular annual reexamination.

Chapter 20 Reexaminations **20.5 Changes Affecting Income or Expenses** **20.5.3.3 Effective Dates**	SLHA has established the time frames in which any changes that result from an interim reexamination will take effect. The changes may be applied either retroactively or prospectively, depending on whether there is to be an increase or a decrease in the rent, and whether the family reported any required information within the required time frames. • If the rent is to increase: o Change must be expected to last at least thirty days. Revised June 22, 2023 20-7 Resolution No. 2968 o The increase generally will be effective on the first of the month following 30 days' notice to the family. o If a family fails to report a change within the required time frames, or fails to provide all required information within the required time frames, the increase will be applied retroactively to the date it would have been effective had the information been provided on a timely basis. • If the rent is to decrease: o The change must be verified to last more than 30 days. o The decrease will be effective on the first day of the month following the month in which the change was reported and all required documentation was submitted. In cases where the change cannot be verified until after the date the change would have become effective, the change will be made retroactively.	SLHA has established the time frames in which any changes that result from an interim reexamination will take effect. The changes may be applied either retroactively or prospectively, depending on whether there is to be an increase or a decrease in the rent, and whether the family reported any required information within the required time frames. • If the rent is to increase: o Change must be expected to last at least thirty days. o The increase generally will be effective on the first of the month following 30 days' notice to the family. o If a family fails to report a change within the required time frames, or fails to provide all required information within the required time frames, then SLHA must initiate an interim recertification. The increase will be applied retroactively to the first day of the month following the date of the action. • If the rent is to decrease: o The change must be verified to last more than 30 days. o If the family reports income/composition changes in a timely manner to SLHA If the family has reported the change in income and/or composition to SLHA in a timely manner, the decrease will be effective on the first day of the month following the month in which the change was reported and all required documentation was submitted. In cases where the change cannot be verified until after the date the change would have become effective, the change will be made retroactively. o If the family has not reported the change in income and/or composition to SLHA in a timely manner or SLHA determines a change was made and not reported, the rent decrease will be effective on the first day of the month following completion of the reexamination SLHA may make a determination that the late report was due to circumstances outside of the family's control and that the decrease will

		be implemented retroactively. Situations where late reporting may warrant a retroactive rent decrease include, but are not limited to: • Medical emergency • Natural disaster • Wage theft by the employer • Disruptions to SLHA operations When the determination is made that the late report was outside of the family's control, then a retroactive decrease may be applied beginning on the later of the first of the month following the date of the actual decrease in income or the effective date of the most recent admission, interim, or annual income examination. A rent adjustment cannot be retroactive to a date prior to the last income examination In case of any rent adjustment, the family will be provided with clear, written communication after the interim reexamination that shows: • Any one-time charge or credit due to a retroactive adjustment. • The new monthly rent due. • The date that rent is due. • The date of the family's next annual income reexamination.

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Chapter 20 Reexaminations **20.5 Changes Affecting Income or Expenses** **20.5.3.4 Discrepancies**	**Discrepancies** During an annual or interim reexamination, SLHA may discover that information previously reported by the family was in error, or that the family intentionally misrepresented information. In addition, SLHA may discover errors made by SLHA. When errors resulting in the overpayment or underpayment of rent are discovered, corrections will be made in accordance with the policies in Chapter 3.	**Discrepancies 24 CFR 5.233, 24 CFR §§ 5.609(c)(4); 960.257(f); 982.516(f); 882.515(f); and 882.808(i)(5)** During an annual or interim reexamination, SLHA may discover that information previously reported by the family was in error, or that the family intentionally misrepresented information. If it is later determined that a family inaccurately reported income during an interim reexamination, the family may owe the SLHA for any miscalculation in rent based on the family's incorrect reporting. SLHA will review the EIV New Hires report between annual reexaminations given the SLHA's policy to not include earned income increases in determining whether the 10% threshold is met for increases in adjusted income when the family previously had an interim reexamination performed for a decrease in annual adjusted income since the last annual reexamination In addition, SLHA may discover errors made by SLHA. SLHA will not be considered out of compliance for a "de minimis" error that results in a difference in the determination of a family's adjusted income $30 or less per month (or $360 in annual adjusted income) On becoming aware of an error(s)s, SLHA must correct retroactively to the effective date of the action the error was made regardless of the dollar amount. SLHA must repay or credit the family regardless of the dollar amount. SLHA must repay or credit the family for overcharged rent, but is not required to charge back rent if the family was under changed. When errors resulting in the overpayment or underpayment of rent are discovered, corrections will be made in accordance with the policies in Chapter 3.

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Chapter 20 Reexaminations **20.6 Over Income Familes**	**Over Income Familes** The Housing Opportunity Through Modernization Act (HOTMA) of 2016 placed an income limitation on public housing tenancies. The over-income requirement states that after a family's adjusted income has exceeded 120 percent of area median income (AMI) (or a different limitation established by the secretary) for two consecutive years, the PHA must either terminate the family's tenancy within six months of the determination, or charge the family a monthly rent that is the higher of the applicable fair market rent (FMR) or the amount of monthly subsidy for the unit, including amounts from the operating and capital funds, as determined by regulations. The over-income limit is calculated by multiplying the very lowincome limit (VLI) by 2.4, as adjusted for family size. These income limits are established each year by HUD, and published in the Federal Register. At the annual or interim reexamination, if it is determined that a family's adjusted income exceeds the applicable over-income limit, the SLHA will document the family file and begin tracking the family's over-income status. If the family's income continues to exceed the applicable over-income limit one year after the applicable annual or interim reexamination, SLHA will notify the family in writing that their income has exceeded the over-income limit for one year, and that the family may be subject to SLHA's over-income policy. If the family's income continues to exceed the applicable over-income limit for a second consecutive year after the initial over-income determination, SLHA will provide the family a notice of lease termination in accordance with the notification requirements in this ACOP.	**Over Income Families [24 CFR 960.507, 24 CFR 960.509]** The Housing Opportunity Through Modernization Act (HOTMA) of 2016 placed an income limitation on public housing tenancies. The over-income requirement states that after a family's adjusted income has exceeded 120 percent of area median income (AMI) (or a different limitation established by the secretary) for twenty-four (24) consecutive months, the PHA must terminate the family's tenancy within six (6) months of the final notification. The over-income limit is equal to approximately 120% of the AMI and is calculated by multiplying the very low-income limit (VLI) by 2.4, as adjusted for family size. Income limits are established annually by HUD, and published in the Federal Register. Please refer to Appendix 2 of this ACOP for current income limits. At the annual or interim reexamination, if it is determined that a family's adjusted income exceeds the applicable over-income limit, the SLHA will document the family file and begin tracking the family's over-income status. SLHA will notify families in writing within thirty (30) days of the reexamination of their over-income status and that they may be subject to SLHA's Over-Income Policy. If the family's income continues to exceed the applicable over-income limit twelve (12) months after the applicable annual or interim reexamination, SLHA will notify the family in writing that their income has exceeded the over-income limit for twelve (12) months , and that the family may be subject to SLHA's Over-Income Policy. If the family's income continues to exceed the applicable over-income limit at the conclusion of the twenty (24) month grace period after the applicable annual or interim reexamination SLHA will provide the family a notice of lease termination in accordance with the notification requirements in this ACOP. SLHA must terminate the tenancy of the over-income family no more than six (6) months after the required notification.

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	If, at any time, an over-income family experiences a decrease in income during the two-year grace period, the family may request an interim redetermination of income in accordance with PHA policy. If it is determined that the over-income family is now below the over-income limit, the family is no longer subject to over-income provisions as of the effective date of the recertification. The PHA will notify the family in writing that over-income policies no longer apply to them. If the family's income later exceeds the over-income limit again, the family is entitled to a new twoyear grace period.	If, at any time, an over-income family experiences a decrease in income during the twenty-four (24) month grace period, the family may request an interim reexamination in accordance with this ACOP. If SLHA determines that the over-income family has fallen below the over-income limit at any time during the twenty-four (24) month grace period then the family is no longer subject to the over-income provisions as of the effective date of the reexamination. If the family should exceed the over-income limit again, SLHA will begin a new twenty-four (24) month grace period. SLHA will notify the family in writing that over-income policies no longer apply to them.
Chapter 22 **22.1 Lease Terminations** **22.1.2.2 Serious Violations or Other Good Cause -- Examples**	• Meeting or exceeding the over-income limit	• Meeting or exceeding the over-income limit in accordance with SHLA's policy for Over Income Families. See Section 20.6
Chapter 22 **22.1 Lease Terminations** **22.1.2.3 Notice Timing and Requirements**	• 60 days for over-income households	• 60 days for over-income households. Refer to SLHA's policy for Over Income Families in Section 20.6

Chapter 23 Grievance and Appeals **23.3 Grievance Procedure for Public Housing Residents** **23.3.1 Applicability**	SLHA excludes from the grievance procedure any grievance concerning a termination of tenancy or eviction that involves: • Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises of other residents or employees of SLHA or its management agents • Any violent or drug-related criminal activity on or off the development premises • Any criminal activity that resulted in felony conviction of a household member	Pursuant to the One Strike You're Out Policy, SLHA excludes from the grievance procedure any grievance concerning a termination of tenancy or eviction that involves: • Any criminal activity that threatens the health, safety or right to peaceful enjoyment of the premises of other residents or employees of SLHA or its management agents • Any violent or drug-related criminal activity on or off the development premises • Any criminal activity that resulted in felony conviction of a household member
Chapter 23 Grievance and Appeals **23.3 Grievance Procedure for Public Housing Residents** **23.3.2 Informal Settlement of Grievance**	SLHA will accept requests for an informal settlement of a grievance either orally or in writing, to SLHA office within five business days of the grievable event. Within 10 business days of receipt of the request SLHA, through its management agent, will arrange a meeting with the resident at a mutually agreeable time and confirm such meeting in writing to the resident. If a resident fails to attend the scheduled meeting without prior notice, SLHA will reschedule the appointment only if the resident can show good cause for failing to appear, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict, which seriously affects the health, safety or welfare of the family. SLHA will prepare a summary of the informal settlement within five business days; one copy to be given to the resident and one copy to be retained in SLHA's file. The summary must specify the names of the participants, dates of meeting, the nature of the proposed disposition of the complaint and the specific reasons therefore, and will specify the procedures by	Any grievance shall be presented, either orally or in writing, to SLHA's office or to the office of the property in which the Resident resides within five (5) business days of the grievable event so that the grievance may be discussed informally and settled without a hearing. Within ten (10) business days of receipt of the request SLHA will arrange a meeting with the resident at a mutually agreeable time and confirm such meeting in writing to the resident. A summary of the informal meeting will be provided to the resident within five (5) business days of the informal meeting. One copy shall be given to the resident and one retained in the resident's file. The summary shall specify the names of the participants, dates of meeting, the nature of the proposed disposition of the complaint and the specific reasons therefor, and shall specify the procedures by which a grievance hearing may be obtained if the resident is not satisfied with the outcome of the informal meeting. If a resident fails to attend the scheduled informal meeting without prior notice, SLHA will reschedule the appointment only if the resident can show good cause for failing to appear, or if it is needed as a reasonable accommodation for a person with disabilities. Good cause is defined as an unavoidable conflict, which seriously affects the health, safety or welfare of the family.

	which a hearing may be obtained if the complainant is not satisfied.	
Chapter 23 Grievance and Appeals **23.3 Grievance Procedure for Public Housing Residents** **23.3.3 Procedures to Obtain a Formal Hearing**		DELETE **[24 CFR 966.55]**
Chapter 23 Grievance and Appeals **23.3 Grievance Procedure for Public Housing Residents** **23.3.3 Procedures to Obtain a Formal Hearing** **23.3.3.1 Requests for Hearing and Failure to Request**	**Requests for Hearing and Failure to Request [24 CFR 966.55(a), (c), and (d)]** All grievances must be presented in accordance with the informal procedures prescribed above as a condition prior to a grievance hearing. However, if the complainant can show good cause for failure to proceed with the informal hearing to the panel, the panel may waive this provision.	**Requests for Hearing and Failure to Request** Before requesting a formal grievance hearing, the resident must first follow the procedure for the informal settlement meeting prescribed above. However, the formal hearing panel may waive this requirement if the resident can show good cause.

Chapter 23 Grievance and Appeals **23.3 Grievance Procedure for Public Housing Residents** **23.3.3 Procedures to Obtain a Formal Hearing** **23.3.3.2 Escrow Deposits**	**Escrow Deposits [24 CFR 966.55(e)]** Before a hearing is scheduled in any grievance involving the amount of rent that SLHA claims is due, the complainant must pay an escrow deposit to SLHA. When a complainant is required to make an escrow deposit, the amount is the amount of monthly rent SLHA states is due and payable. After the first deposit, the complainant must deposit the same amount monthly until the complainant's grievance is resolved by decision of the panel. SLHA will waive the requirement for an escrow deposit where the complainant is grieving the effect of welfare benefits reduction in the calculation of family income or denial of a request for a financial hardship exemption from minimum rent requirements. Unless SLHA waives the requirement, the complainant's failure to make the escrow deposit will terminate the grievance procedure. A complainant's failure to pay the escrow deposit does not waive the resident's right to contest SLHA's disposition of the grievance in any appropriate judicial proceeding.	**DELETE**
Chapter 23 Grievance and Appeals **23.3 Grievance Procedure for Public Housing Residents** **23.3.3 Procedures to Obtain a Formal Hearing**	**Scheduling of Hearings [24 CFR 966.55(f)]** If the complainant has complied with all requirements for requesting a hearing as described above, a hearing will be scheduled promptly. A written notification specifying the time, place and the procedures governing the hearing will be mailed to the complainant.	**Scheduling of Hearings [24 CFR 966.56(a)]** Upon receipt of the resident's hearing request, SLHA will schedule the grievance hearing promptly for a time and place reasonably convenient to both the resident and SLHA. A written notification specifying the time, place, and the procedures governing the hearing will be sent to the resident via U.S. Mail First Class postage pre-paid.

23.3.4 Scheduling of Hearings		
Chapter 24 Community Service **24.2 Requirements**	An individual may not skip a month and then double up the following month, unless warranted by special circumstances. SLHA will make the determination of whether to permit a deviation from the schedule. Individuals who have special circumstances which they believe will prevent them from completing the required community service hours for a given month must notify SLHA in writing within five business days of the circumstances becoming known. SLHA will review the request and notify the individual, in writing, of its determination within 10 business days. SLHA may require those individuals to provide documentation to support their claim.	The requirement is not restricted to a precise eight hours per month; a resident could comply by performing any amount of hours per month, as long as at least 96 hours are accumulated by their annual certification.
Chapter 24 Community Service **24.3.Definitions for Community Service** **24.3.1 Exempt Individual**	An exempt individual is an adult who: • Is age 62 years or older • Is blind or disabled (as defined under section 216[i][l] or 1614 of the Social Security Act), and who certifies that because of this disability s/he is unable to comply with the service provisions • Is a primary caretaker of such an individual • Is engaged in work activities (SLHA will consider 20 hours per week as the minimum number of hours needed to qualify for a work activity exemption)	An exempt individual is an adult who: • Is age 62 years or older • Is blind or disabled (as defined under section 216[i][l] or 1614 of the Social Security Act), and who certifies that because of this disability s/he is unable to comply with the service provisions • Is a primary caretaker of an individual who is blind or disabled (as defined under section 216[i][l] or 1614 of the Social Security Act), and who certifies that because of this disability s/he is unable to comply with the service provisions

	• Is able to meet requirements under a state program funded under part A of title IV of the Social Security Act ("Block grants To States for Temporary Assistance for Needy Families"), or under any other welfare-to-work program of the state of Missouri. Including a state-administered welfare-to-work program • Is a member of a family receiving assistance, benefits, or services under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state of Missouri, including a state-administered welfare-to-work program or Supplemental Nutrition Assistance Program (SNAP), and has not been found by the state or other administering entity to be in noncompliance with such program. Supplemental Nutrition Assistance Program (SNAP) qualifies as a welfare program of the state.	• Is engaged in work activities as defined by Section 407(d) of the Social Security Act (42 USC Section 607 (d) for at least twenty (20) hours per week • Is able to meet requirements under a state program funded under part A of title IV of the Social Security Act ("Block grants To States for Temporary Assistance for Needy Families"), or under any other welfare-to-work program of the State of Missouri
Chapter 24 Community Service **24.3Definitions for Community Service** **24.3.2 Exempt Family**		*****ADD NEW SECTION** An exempt family is a family in which a member is receiving assistance, benefits, or services under a state program funded under part A of title IV of the Social Security Act, or under any other welfare program of the state of Missouri, including a state-administered welfare-to-work program or Supplemental Nutrition Assistance Program (SNAP), and has not been found by the state or other administering entity to be in noncompliance with such program. Supplemental Nutrition Assistance Program (SNAP) qualifies as a welfare program of the State of Missouri.

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Chapter 24 Community Service **24.5 Determination of Exemption Status and Compliance**	SLHA must review and verify family compliance with service requirements annually at least 30 days before the end of the 12-month lease term. The policy for documentation and verification of compliance with service requirements is set forth below	SLHA must review and verify family compliance with service requirements annually. The policy for documentation and verification of compliance with service requirements is set forth below
Chapter 24 Community Service **24.5 Determination of Exemption Status and Compliance** **24.5.1 Annual Determination** **24.5.1.2 Determination of Compliance**	Approximately 60 days prior to the end of the lease term, SLHA will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement. The family will have 10 business days to submit SLHA required documentation form(s).	At least 60 days prior to the end of the lease term, SLHA will provide written notice requiring the family to submit documentation that all subject family members have complied with the service requirement. The family will have 10 business days to submit SLHA required documentation form(s).
Chapter 24 Community Service **24.5 Determination of Exemption Status and Compliance** **24.5.2 Change in Status between Annual Determinations**	If an exempt individual becomes nonexempt during the 12-month lease term; it is the family's responsibility to report this change to SLHA within 30 days from the date the change takes effect. Within 30 days of a family reporting such a change, or SLHA determining such a change is necessary, SLHA will provide a copy of the community service policy, as well as a documentation form on which the family member may record the activities performed and number of hours contributed. The effective date of the community service requirement will be the first of the month following a 30-day notice.	If an exempt individual becomes nonexempt during the 12-month lease term; it the family must report this change to SLHA within thirty (30) days from the date the change takes effect. Within thirty (30) days of a family reporting such a change, or SLHA determining such a change is necessary, SLHA will provide a copy of the community service policy, as well as a documentation form on which the family member may record the activities performed and number of hours contributed. The effective date of the community service requirement will be the first of the month following a 30-day notice.

24.5.2.1 Exempt to Nonexempt Status		
Chapter 24 Community Service **24.5 Determination of Exemption Status and Compliance** **24.5.2 Change in Status between Annual Determinations** **24.5.2.2 Nonexempt to Exempt Status**	If a nonexempt person becomes exempt during the 12-month lease term, it is the family's responsibility to report this change to SLHA within 30 days. Any claim of exemption will be verified by SLHA.	If a nonexempt person becomes exempt during the 12-month lease term, it is the family must If a nonexempt person becomes exempt during the 12-month lease term, it is the family's responsibility to report this change to SLHA within 30 days. Any claim of exemption will be verified by SLHA.
Chapter 24 Community Service **24.6 Documentation and Verification** **24.6.2 Documentation and Verification of Compliance**	If anyone in the family is subject to the community service requirement, SLHA will provide the family with community service documentation forms at admission, at lease renewal, when a family member becomes subject to the community service requirement during the lease term, or upon request of the family. Each individual who is subject to the requirement will be required to record their community service or self-sufficiency activities and the number of hours contributed on the required form. The certification form will also include places for signatures and phone numbers of supervisors,	If anyone in the family is subject to the community service requirement, SLHA will provide the family with community service documentation forms at admission, at lease renewal, when a family member becomes subject to the community service requirement during the lease term, or upon request of the family. Each individual who is subject to the requirement will be required to record their community service or self-sufficiency activities and the number of hours contributed on the required form. The certification form will also include places for signatures and phone numbers of supervisors, instructors, and

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	instructors, and counselors certifying the number of hours contributed.	counselors certifying the number of hours contributed. Self-certification will not be accepted.
ACOP APPENDIX 2 **Income Limtits**		SEE ATTACHMENT
ACOP APPENDIX 3 **Flat Rent Schedule**		SEE ATTACHMENT

APPENDIX 2

St. Louis Housing Authority

INCOME LIMITS

FY 2024 Income Limits

Median Family Income $103,200

No. of Persons	1	2	3	4	5	6	7	8	9	10	11	12
Extremely Low Income (30%) Limit	$21,700	$24,800	$27,900	$31,200	$36,580	$41,960	$47,340	$52,720	$58,100	$63,480	$68,860	$74,240
Very Low (50%) Income Limit	$36,150	$41,300	$46,450	$51,600	$55,750	$59,900	$64,000	$68,150	$72,250	$76,400	$80,500	$84,650
Low (80%) Income Limit	$57,800	$66,050	$74,300	$82,550	$89,200	$95,800	$102,400	$109,000	$115,600	$122,200	$128,800	$135,400
Over-Income (120%) Income Limit	$86,760	$99,120	$111,480	$123,840	$133,800	$143,760	$153,600	$139,440	$173,400	$183,360	$193,200	$203,160

NOTE: The above income limits are effective as of April 1, 2024 and subject to change as HUD generally revises these limits annually.

The latest and most recent annual income limits as established and approved by HUD shall be applicable and are automatically incorporated into and made a part of this policy as of the effective date of the newly established income limits as set forth and approved by HUD. As Income Limits are revised and modified by HUD and adopted by the SLHA Board of Commissioners through board resolution, they will be posted at each development.

Resolution No. XXXX
Approved by the Board of Commissioners June 27, 2024

ATTACHMENT #3E

Section B.1 (c) – PHA Plan Update – Plan Elements Revised

Item 2–Deconcentration and Other Policies that Govern Eligibility, Selection & Admissions

Administration Plan (Section 8 Housing Choice Program) - Changes
Admissions and Continued Occupancy Policy (ACOP) – Matrix of Changes

Flat Rent Comparables (ACOP Appendix #3) – SLHA annually revises the Flat Rent Comparables to adjust rent limits comparable to local area rents. (Attachment 5)

REFERENCE ATTACHMENT #5

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

Office of Housing
Office of Public and Indian Housing

Special Attention of:

Multifamily Asset Management Division Directors
Multifamily Contract Administrators
Multifamily Project Owners
Multifamily Regional Center Directors
Public Housing Agencies
Public Housing Hub Office Directors
Public Housing Program Center Directors
Regional Directors
Field Office Directors
Resident Management Corporations

Notice H 2023–10

Notice PIH 2023–27

Issued: February 2, 2024
Originally issued September 29, 2023

Expires: This Notice remains in effect until amended, superseded, or rescinded.

Cross References:

Regulations: 24 CFR Parts 5, 882, 891, 960, 966, 982

Office of Housing Notices: H 2020–06; H 2019–06; H 2016–01; H 2015–12

Office of Public and Indian Housing Notices: PIH 2019–09; PIH 2017–05 (HA); PIH 2016–05; PIH 2015–21; PIH 2013–04 (HA); PIH 2012–29; PIH 2012–03; PIH 2012–1 (HA)

Implementation Guidance: Sections 102 and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA)

1. PURPOSE

The purpose of this notice is to provide guidance to Public Housing Agencies (PHAs) and Multifamily Housing (MFH) Owners on the implementation of the many program changes brought about by the Housing Opportunity Through Modernization Act of 2016 (HOTMA) sections 102 and 104 and detailed in the final rule published in *Federal Register* Notice 88 FR 9600 on February 14, 2023. Although the final rule addresses sections 102, 103, and 104, this notice addresses guidance for sections 102 and 104 only.[1]

Through this notice, HUD is also modernizing its documentation requirements to reduce the burden on families accessing housing assistance in support of Office of Management and Budget (OMB) Memo M-22-10, *Improving Access to Public Benefits Programs Through the Paperwork Reduction Act.*

[1] The Office of Public and Indian Housing (PIH) published a separate notice on section 103 of HOTMA. See *Supplemental Guidance for Implementation of Section 103; Limitation on Public Housing Tenancy for Over-Income Families under the Housing Opportunity Through Modernization Act of 2016 (HOTMA)* (Notice PIH 2023–03 (HA)).

2. BACKGROUND

HOTMA was signed into law on July 29, 2016 (Public Law 114–201, 130 Stat. 782). The HOTMA statute consists of 14 sections of law that affect the Public Housing and Section 8 rental assistance programs. On September 17, 2019, HUD issued a proposed rule to update its regulations according to HOTMA's statutory mandate. The proposed rule may be found at 84 FR 48820 (September 17, 2019).

Sections 102 and 104 of HOTMA make sweeping changes to the United States Housing Act of 1937 (1937 Act), particularly those affecting income calculations and reviews. **Section 102** changes requirements related to income reviews for Public Housing and Section 8 programs. **Section 104** sets maximum asset limits for Public Housing and Section 8 applicants and participants.

Section 102 of HOTMA applies to all PHAs operating a Housing Choice Voucher (HCV) (including Project-Based Vouchers), Public Housing; Section 8 Moderate Rehabilitation, or Section 8 Moderate Rehabilitation Single Room Occupancy (SRO), including Moving to Work (MTW) Agencies (see Section 4 (Notice Applicability) of this notice). Section 102 also applies to the following programs administered by MFH: Section 8 Project-Based Rental Assistance (PBRA), 202/8, 202/162 Project Assistance Contract (202/162 PAC), Section 202/811 Capital Advance with Project Rental Assistance Contract (202/811 PRAC), non-insured 236 projects with Interest Reduction Payments (236 IRP), Section 811 Project Rental Assistance Demonstration (811 PRA), and Senior Preservation Rental Assistance Contracts (SPRAC).[2] Section 102 is effective on January 1, 2024.

Section 104 of HOTMA applies to all PHAs operating an HCV, Public Housing, Section 8 Moderate Rehabilitation, or Section 8 Moderate Rehabilitation SRO program, including MTW Agencies (see Section 4 (Notice Applicability) of this notice). Section 104 also applies to the following programs: Section 8 PBRA and 202/8. Section 104 does not apply to following programs: 202/811 PRAC, 236 IRP, 811 PRA, 202/162 PAC, and SPRAC. Section 104 is effective on January 1, 2024.

HUD, through rulemaking,[3] implemented sections 102 and 104 through several changes to the following Public Housing and Section 8 regulations:

- 24 CFR Part 5: General HUD Program Requirements; Waivers
- 24 CFR Part 882: Section 8 Moderate Rehabilitation Programs
- 24 CFR Part 960: Admission to, and Occupancy of, Public Housing
- 24 CFR Part 982: Section 8 Tenant-Based Assistance: Housing Choice Voucher Program

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[2] HUD administratively extended the applicability of Section 102 of HOTMA to the following programs: 202/162, 202/811 PRAC, 811 PRA, and SPRAC.

[3] *Federal Register*: Housing Opportunity Through Modernization Act of 2016: Implementation of Sections 102, 103, and 104.

HUD also made conforming changes to its regulations found in 24 CFR Part 891, which govern the Section 202 and 811 Capital Advance programs and the Section 202 Direct Loan program (202/8). These programs are affected by various changes to the income regulatory provisions in 24 CFR Part 5. HUD, in error, did not make conforming changes to certain Section 202 Direct Loan regulations, consistent with the HOTMA final rule, in 24 CFR Part 891, Subpart E, including 891.655, 891.740, and 891.750, which govern 202/162 PAC projects. HUD published conforming changes to the Section 202/162 PAC program regulations as a technical correction that will become effective on January 1, 2024.[4] The revised Section 202 Direct Loan regulatory references in this notice will become effective with the effective date of the forthcoming technical correction.

Note: The final rule does not otherwise revise or modify any other federal laws or regulations. PHAs/MFH Owners must continue to follow all laws and regulations as codified in statute and in the Code of Federal Regulations.

2.1 Technical Corrections and Clarifications

HUD has updated Attachment A to address the asset limitation found in Section 104 of HOTMA and replaced the previous Attachment A that included placeholder language. In addition, HUD has made several technical corrections and added clarifying language throughout the notice, based on feedback from stakeholders and further analysis of the HOTMA Income and Assets Final Rule and related laws and regulations. These changes from the previous version of the notice published on September 29, 2023, are listed here as follows:

- Throughout the notice, HUD has added both the references to the 202/162 PAC program and the program's regulations as the conforming changes to the program were issued through the following *Federal Register* notice: https://www.federalregister.gov/documents/2023/11/02/2023-24236/section-202-direct-loan-technical-amendments.
- In Section 6.1, HUD removed a sentence that incorrectly stated that PHAs must pick a compliance date that falls before the deadline for their PHA Plan submission. HUD also added MTW Plans to the list of documents requiring updates due to HOTMA.
- In Attachment B, subtopic B.2, HUD added clarifying language on the three-step process for calculating income, specifically for Step 2, adding that the PHA/MFH Owner may use the verification obtained during an interim reexamination for an annual reexamination if there have been no other changes to annual income since the interim reexamination. In Step 3, HUD replaced the word "paycheck" with "pay stub." In the example B1, HUD changed the SSA COLA amount to the actual 2024 COLA amount of 3.2 percent. In the example B3, HUD changed "four current and consecutive paystubs" to "two current and consecutive paystubs." In example B4, HUD changed the COLA amount to 3.2 percent and adjusted the calculations.
- In Attachment C, subtopic C.2, HUD clarified that while the elderly/disabled family deduction is effective on January 1, 2024, PHAs/MFH Owners will apply the new deduction amount to a family's next annual or interim reexamination, whichever is

[4] Federal Register :: Public Inspection: Direct Loan Technical Amendments.

sooner, following the date on which the PHA/MFH Owner implements the new elderly/disabled family deduction.

- In Attachment C, subtopic C.4.a, HUD clarified that the phased-in relief for the health and medical care expenses deduction will not start until after the PHA/MFH Owner implements the phased-in relief. Likewise, in the Phased-in Relief Timing Table (Table C1), HUD replaced the date of January 1, 2024, with the date on which the PHA/MFH Owner implements the phased-in relief.
- In Attachment C, subtopic C.5, HUD edited the phrase “age 12 and younger” to “under 13 years of age,” to align with HUD’s definition of “child-care expenses” in 24 CFR 5.603. HUD also clarified in this subsection that the amount of child-care expenses (not the expenses incurred to enable a family member to work) deducted from annual income must not exceed the amount of employment income that is included in annual income.
- In Attachment C, subtopic C.6.b, HUD edited the date by which PHAs/MFH Owners are encouraged to communicate the new hardship exemptions to applicants and families, replacing January 1, 2024, with the date on which the PHA/MFH Owner begins to comply with HOTMA.
- In Attachment C, subtopic C.7, HUD added another example of a permissive deduction that PHAs may choose to establish, which is the amount paid from a family’s annual income, and not another source such as Medicaid or a child welfare agency, for unreimbursed health or medical expenses of a foster child or a foster adult. In Attachment E, subtopic E.2, HUD clarified that PHAs may establish a permissive deduction to allow the unreimbursed health and medical expenses paid by the family on behalf of foster children and adults to be deducted from annual income.
- In Attachment F, subtopic F.1, HUD added clarifying language to address how PHAs/MFH owners must consider garnished, levied, or withheld wages or benefits.
- In Attachment F, subtopic F.4.e, HUD updated the method for subtracting federal tax refunds and refundable tax credits from assets to accurately reflect the statutory and regulatory requirements of HOTMA. Previously, the notice stated that the tax refund was to be subtracted from the asset account into which the tax refund amount was deposited. To align with HOTMA, the tax refund must instead be subtracted from the total value of net family assets. HUD deleted the reference to a tax refund or refundable tax credit that is deposited into an excluded asset, as this is incorrect. The tax refund/credit amount must be subtracted from total net family assets, regardless of where the amount is deposited. In example F2, HUD clarified that the Rodriguez family owns a total of $10,000 of net family assets.
- In Attachment F, subtopic F.5, with regard to the start date for using the HUD-published passbook rate, HUD updated the date of January 1, 2024, with the date on which the PHA/MFH Owner implements the new passbook rate, and added clarifying language on PHA flexibility around passbook rates up until they implement the new passbook rate.

- In Attachment F, subtopic F.6.b, HUD added clarifying language on how PHAs/MFH Owners are to impute asset income using the HUD-published passbook rate.
- In Attachment G, subtopic G.1.f, HUD clarified that non-recurring, non-monetary in-kind donations from friends and family may be excluded as non-recurring income.
- In Attachment G, subtopic G.6, HUD clarified that workers' compensation payments, regardless of the length or frequency of the payments, are always excluded from annual income. HUD updated example G6 to reflect this clarification.
- In Attachment G, subtopic G.16.d, HUD corrected the example reference to example G13, and reversed the wording on the process for calculating the excess amount of student financial assistance to include in annual income. The previous one-step process, as described, was incorrect. This error was also corrected in Chart G2.
- In Attachment I, subtopic I.2, HUD clarified in the PHA/MFH Owner discretion section that PHAs/MFH Owners have discretion on whether to process earned income increases only if there has been a previous interim decrease since the last annual reexamination.
- In Attachment J, subtopic J.1, HUD added a clarifying footnote (J1) to reduce confusion about the Form HUD–9886/HUD–9887 requirements for family members who become a head of household, co-head, or spouse.
- In Attachment J, Table J1, HUD added instructions on the use of EIV for new admissions in the row on Income Information for PIH Programs and Income Report for MFH Programs. HUD also added a footnote reminding PHAs/MFH Owners that they must rely on other documents to verify families' reported income before admission.
- In Attachment J, Table J2, Level 6, HUD clarified that PHAs/MFH Owners must pull the EIV Income Report for each family at every Annual Reexamination, unless using Safe Harbor documentation to verify the family's income. HUD also added to the Level 1 row that self-certification may be used as the highest form of verification when the family reports zero income.
- In Attachment J, subtopic J.5.a, HUD clarified that PHAs/MFH Owners are required to obtain a minimum of two current and consecutive pay stubs for determining projected annual income from wages when they are relying on pay stubs for Level 4 documentation.
- HUD renamed subtopic J.8 in Attachment J to "Zero Income Procedures" and updated this section to include guidance to PHAs/MFH Owners on accepting families' self-certifications of zero income at admission and reexamination without taking further steps to verify the zero reported income.
- HUD added the Appendix: Sample Net Family Assets Self-Certification Form.

3. BURDEN REDUCTION AND PROGRAM ALIGNMENT

OMB Memo M-22-10, *Improving Access to Public Benefits Programs Through the Paperwork Reduction Act*, challenges federal agencies to review documentation requirements for those accessing public benefits programs like HUD's rental assistance programs. Through the process of implementing HOTMA, HUD has reviewed its verification and documentation requirements for admission and continued occupancy, including the use of HUD's Enterprise Income Verification (EIV) system in the Public Housing, Housing Choice Voucher, and the Multifamily Housing programs listed above. These programs share regulatory language around the requirement to obtain third-party verification of family annual income, the value of assets, expenses related to deductions from annual income and other factors that affect the determination of adjusted income (§§ 5.659(d), 960.259(c), 982.516(a)(2)).

Through this notice, HUD is aligning the timeframes within which documentation must be dated and the breadth of documentation required to verify tenant bank accounts and employment income across PIH and MFH programs. Consistency among HUD's programs will reduce burden among tenants who move from one program to another and among entities that administer multiple HUD programs.

4. NOTICE APPLICABILITY

HOTMA updates and creates new rules for programs administered by the Office of Public and Indian Housing (PIH) (HCV [including Project-Based Vouchers], Moderate Rehabilitation, Moderate Rehabilitation SRO, Public Housing), and programs administered by the Office of Multifamily Housing (MFH) (Section 8 PBRA, 202/8, 202/162 PAC, 202/811 PRAC, 236 IRP, 811 PRA, SPRAC). HUD's revisions to the Part 5 income regulations also affect certain programs administered by the Office of Community Planning and Development (CPD).[5] HUD reminds PHAs/MFH Owners that they are required to meet all program requirements on rental units assisted and/or developed by multiple HUD programs.

This notice applies only to the following programs:

- Housing Choice Voucher (HCV);
- Public Housing;
- Section 8 Moderate Rehabilitation (Mod Rehab);
- Section 8 Moderate Rehabilitation Single Room Occupancy (SRO);
- Section 8 Project-Based Rental Assistance (PBRA);
- Section 202/8 (202/8);
- Section 202/162 Project Assistance Contract (202/162 PAC);
- Section 202/811 Capital Advance with Project Rental Assistance Contracts (202/811 PRAC);
- Non-insured 236 projects with Interest Reduction Payments (236 IRP);
- Section 811 Project Rental Assistance (811 PRA); and

[5] CPD will issue separate guidance on how HOTMA impacts its programs.

- Senior Preservation Rental Assistance Contracts (SPRAC).

The contents of this notice apply to PHAs participating in the MTW program except where an approved MTW waiver is in place. For example, MTW PHAs that have previously developed a different method of measuring prior-year income as part of the Rent Reform Demonstration or Stepped and Tiered Rent Demonstration may continue to use those methods after this notice takes effect. References to form HUD–50058 in this notice take on the meaning of form HUD–50058 MTW for MTW PHAs and form HUD–50058 MTW Expansion for MTW Expansion PHAs.

5. STRUCTURE OF THIS PUBLICATION

This notice is organized by distinct topic areas to assist PHAs/MFH Owners in identifying programmatic changes that affect their operations. Each topic area is presented as an attachment to the notice. Each attachment follows a uniform structure:

- Regulation(s)
- Affected Program(s)
- Summary of Change(s)
- Subtopics

Within each topic area, and in some cases within subtopic areas, the notice indicates whether PHAs/MFH Owners have discretion in establishing policies within their individual programs.

6. EFFECTIVE DATE, COMPLIANCE, AND UPDATES TO PHA/MFH OWNER POLICIES

The final rule's effective date is January 1, 2024. HUD recognizes, however, that HOTMA includes significant program and systems changes and that PHAs/MFH Owners and families need time to understand the changes and implement them. HUD understands that the system development timeframes for the Housing Information Portal (HIP) and Tenant Rental Assistance Certification System (TRACS) make full implementation and compliance with the final rule by the January 1, 2024, deadline unlikely. Additionally, because these HOTMA changes apply to all current participants and new admissions, implementation of the HOTMA final rule cannot be achieved immediately on a universal basis but rather is an ongoing process that will happen over the course of a year as routine program activities occur. Subparagraphs 6.1 and 6.2 describe HUD's implementation requirements by program office.

6.1 Compliance Date and Required Actions for PHAs (Office of Public and Indian Housing)

To comply with HOTMA, PHAs must be able to submit transactions to the Housing Information Portal (HIP). This requires the PHA's software vendor to make system updates and fully convert to making all submissions to HIP. Each PHA will set its own compliance date as early as January 1, 2024, but no later than January 1, 2025. "Compliance" means, in this instance, utilizing the HOTMA rules as it applies to the affected programs and corresponding reporting in HIP. The Real Estate Assessment Center (REAC) will issue a separate HIP transition notice later this year.

Requirements for Updating PHA Annual Plans or Annual MTW Plans:

- The deadline to submit the updated PHA Annual Plan or Annual MTW Plan to HUD will depend on the PHA's fiscal year start date. However, the PHA's chosen compliance date should also be considered.
- The regulations (24 CFR § 903.5(b)(3)) require that a PHA submit its PHA Annual Plan 75 days prior to the beginning of its fiscal year. To best utilize the required PHA Plan process for review and discussion of the ACOP and HCV Administrative Plan at the public hearing, PHAs must also submit their PHA Annual Plan to HUD at least 75 days before their compliance date or their Fiscal Year start date, whichever is sooner. See Table 1, below, to determine the due date of your PHA's Annual Plan or Annual MTW Plan based on your fiscal year start date and compliance date.
- PHAs must update their Public Housing Admissions and Continued Occupancy Policies (ACOP) and HCV Administrative Plans to reflect HOTMA rules and discretionary decisions, including the required public notification and review.
- The plans will indicate that policies are not effective until the PHA's compliance date.

Note: PHAs must continue to follow their existing ACOPs and Administrative Plans until the PHA's software is compliant with HIP.

What PHAs must do once their software is HOTMA compliant:

- Each PHA will establish a compliance date based on when the PHA's software is able to submit to HIP. All transactions **effective** on the PHA's compliance date or later will be processed using HOTMA policies. In setting a compliance date the PHA must consider when its software will be ready to submit to HIP and the time needed to ensure that all transactions effective on that day are processed using HOTMA rules. For example, a PHA with a May 1, 2024, compliance date will need to send Annual Reexamination packets reflecting the HOTMA changes in January 2024. The PHA must inform the family as to whether their income determination is being conducted under the pre-HOTMA regulations or in accordance with the HOTMA final rule.
- PHAs must implement their revised ACOP and Administrative Plans.

PHA Annual Plan Due Date Based on PHA's Fiscal Year Start Date and Compliance Date:

The 4 columns on the right represent Fiscal Year Start Dates and the rows represent possible Compliance Dates. When a PHA determines its Compliance Date, it can use this table to determine the Annual Plan due date by locating the appropriate Compliance Date row and then finding the column with its Fiscal Year Start Date.

Table 1: Recommended Annual Plan Due Date

Compliance Date	FY Start: July 1, 2024	FY Start: October 1, 2024	FY Start: January 1, 2025	FY Start: April 1, 2025

January 1, 2024	October 18, 2023	October 18, 2023	Oct 18, 2024	October 18, 2023
February 1, 2024	November 18, 2023	November 18, 2023	November 18, 2023	November 18, 2023
March 1, 2024	December 17, 2023	December 17, 2023	December 17, 2023	December 17, 2023
April 1, 2024	January 16, 2024	January 16, 2024	January 16, 2024	January 16, 2024
May 1, 2024	February 16, 2024	February 16, 2024	February 16, 2024	February 16, 2024
June 1, 2024	March 18, 2024	March 18, 2024	March 18, 2024	March 18, 2024
July 1, 2024	April 17, 2024	April 17, 2024	April 17, 2024	April 17, 2024
August 1, 2024	April 17, 2024	May 18, 2024	May 18, 2024	May 18, 2024
September 1, 2024	April 17, 2024	June 18, 2024	June 18, 2024	June 18, 2024
October 1, 2024	April 17, 2024	July 18, 2024	July 18, 2024	July 18, 2024
November 1, 2024	April 17, 2024	July 18, 2024	August 18, 2024	August 18, 2024
December 1, 2024	April 17, 2024	July 18, 2024	September 17, 2024	September 17, 2024
January 1, 2025	April 17, 2024	July 18, 2024	October 18, 2024	October 18, 2024
Latest Submission Deadline	April 17, 2024	July 18, 2024	October 18, 2024	October 18, 2024

By January 1, 2025:

Full compliance with the HOTMA final rule is mandatory effective January 1, 2025.

Compliance Example:

In March 2024, the PHA's software vendor says they will be ready to submit to HIP in June 2024. The PHA sets their compliance date as August 1, 2024, to allow for enough time to send out recert packets that reflect HOTMA changes in April 2024 for families with an August 1, 2024, annual reexamination effective date. The PHA's fiscal year start date is October 1, 2024. Based on the compliance date table above, the PHA determines that they must submit their updated Annual Plan to HUD by May 18, 2024. The PHA posts on their Web site that they will be applying the new HOTMA changes to all transactions effective August 1, 2024. They also send notifications to participants, so they understand the new rules for reporting interim changes.

6.2 Compliance Date and Required Actions for MFH Owners (Office of Multifamily Housing)

By March 31, 2024:

- By March 31, 2024, MFH Owners must update their Tenant Selection Plans and EIV policies and procedures to reflect HOTMA rules and discretionary policies.
- MFH Owners must make the revised Tenant Selection Plan publicly available.

Note: MFH Owners must continue to follow their existing Tenant Selection Plans and EIV policies & procedures until the MFH Owner’s software is compliant with TRACS 203A.

What MFH Owners must do once their software is HOTMA compliant:

Once a MFH Owner’s software is HOTMA compliant (i.e., TRACS 203A system requirements have been fully implemented), the following things must happen:

- MFH Owners must provide tenants at least 60 days’ notice that their lease will be modified at the end of the lease term after the expiration of the 60 days’ notice. Once proper notice is given, MFH Owners must begin using the revised Model Leases at the expiration of a family’s lease term.
- MFH Owners must implement their revised Tenant Selection Plans and EIV policies and procedures.
- All tenant data submissions must comply with the HOTMA regulations. Prior to their first reexaminations under HOTMA, MFH Owners must inform families that their income determinations will be conducted in accordance with the HOTMA final rule. As a best practice, HUD recommends that MFH Owners describe to families how their income determinations will change with the implementation of the final rule.
- MFH Owners must use the revised Tenant Consent form (form HUD–9887/9887A) and Fact Sheets (“How Your Rent is Determined”).

How HUD will monitor MFH Owner compliance prior to January 1, 2025:

Prior to January 1, 2025, MFH Owners will not be penalized for HOTMA-related tenant file errors during Management and Occupancy Reviews (MORs). Instead, the Contract Administrator will issue observations with corrective actions.

By January 1, 2025:

Full compliance with the HOTMA final rule is mandatory effective January 1, 2025.

How HUD will monitor owner compliance on or after January 1, 2025:

- Contractor Administrators will issue HOTMA-related findings during MORs.
- MFH Owners must correct all HOTMA-related observations that were issued by Contract Administrators during 2024.

- MFH Owners who fail to implement HOTMA may be found in default of their business agreements with HUD.

Questions about compliance should be directed to MFH_HOTMA@hud.gov.

MFH Model Leases

MFH is updating the five program Model Leases to conform to the requirements in the HOTMA final rule. MFH Owners must begin using the new HUD-approved leases once HOTMA is fully implemented at the property.

The following information outlines the process that MFH Owners must follow to renew families under the applicable revised Model Lease:

- **Any modification to the lease may be effective only at the end of a lease term for all MFH programs.** Lease terms are listed in paragraph 2 in form HUD–90105–A (Section 8 Model Lease); paragraphs 1 and 9 in form HUD–90105–B (202/8 Model Lease); paragraphs 1 and 8 in form HUD–90105–C (202 PRAC Model Lease); paragraphs 1 and 8 in form HUD–90105–D (811 PRAC Model Lease); and paragraphs 1 and 8 in form HUD–92236 (811 PRA Model Lease).
- MFH Owners must provide families with copies of the HUD-approved lease at least 60 days prior to the end of a family's lease term.
- MFH Owners must include a letter clearly stating that the family can either accept the modification or move, but that a response is due from the family within 30 days.
- Families must either accept the modification by signing both copies of the modification and returning one to the MFH Owner[6] or refuse the modification and give the owner a 30-day notice of intent to vacate.
- If, within 30 days, the family indicates that the modification is unacceptable or does not respond, the MFH Owner may begin the procedures for terminating tenancy.

The lease modification notice must be served to families in the following manner[7]:

1) The MFH Owner must send a letter by first-class mail, properly stamped, and addressed and including a return address, to the family at the unit address; **and**
2) The MFH Owner must deliver a copy of the notice to any adult person answering the door at the unit. If no adult answers the door, the person serving the notice may place it under or through the door or affix it to the door.

The date on which the notice is deemed received by the family is the later of:

1) The date the first-class letter is mailed; or
2) The date the notice is properly given.

[6] Electronic signature is acceptable pursuant to Notice H 2020–10, except where not permitted by state and/or local laws.

[7] 24 CFR § 247.4(b), as applicable to 24 §§ CFR 891.430(b), 891.630(b), and 891.770(b).

Service of the notice is deemed effective once the notice has been both mailed and hand-delivered. **MFH Owners are not permitted to deliver lease modification notices to families electronically.**

Families who are under old leases after the MFH Owner becomes compliant with HOTMA must continue to report income and household composition changes between annual reexaminations in accordance with their existing leases until they sign a revised lease. MFH Owners will be required to determine whether changes reported by families under the old lease will require an interim reexamination consistent with HOTMA's requirements. Since the remaining provisions reflect changes to existing regulatory provisions during the period of an existing lease, all other HOTMA final rule provisions can be implemented without the family's execution of a revised lease.

No other modifications may be made to the Model Leases without HUD's approval. MFH Owners may incorporate existing HUD-approved lease addenda into the revised Model Leases if the addenda do not conflict with the requirements of the final rule.

7. SUPERSEDED AND RESCINDED NOTICES

7.1 Guidebooks and Handbooks

This notice supersedes relevant portions of HUD's guidance as provided in the HCV Guidebook, the Public Housing Occupancy Program Guidebook, and the HUD Handbook 4350.3: Occupancy Requirements of Subsidized Multifamily Housing Programs. HUD will update and replace all the sections and chapters listed below. Before consulting one of these resources, please ensure you are using a version dated after the publication date of this notice. Questions regarding the relevancy of existing handbook/guidebook guidance should be directed to the HOTMA mailbox maintained by each program office.

HCV Guidebook chapters to be updated:

- Eligibility Determination and Denial of Assistance
- Reexaminations

Public Housing Occupancy Guidebook chapters to be updated:

- Eligibility Determination and Denial of Assistance
- Income Determination
- Reexaminations

HUD Handbook 4350.3: Occupancy Requirements of Subsidized Multifamily Housing Programs chapters to be updated:

- Chapter 3. Eligibility for Assistance and Occupancy
- Chapter 4. Waiting List and Tenant Selection
- Chapter 5. Determining Income and Calculating Rent
- Chapter 7. Recertification, Unit Transfers, and Gross Rent Changes
- Chapter 9: Enterprise Income Verification (EIV)

- Glossary

7.2 Housing and PIH Notices

This notice supersedes and replaces the guidance provided in the following program notices:

- Exclusion from Annual Income of Temporary Employment from the U.S. Census Bureau (H 2020–06)
- Verification of Social Security Numbers (SSNs), Social Security (SS) and Supplemental Security Income (SSI) Benefits; and Effective Use of the Enterprise Income Verification (EIV) System's Identity Verification Report (PIH 2018–24)
- Administrative Guidance for Effective and Mandated Use of the Enterprise Income Verification (EIV) System (PIH 2018–18)
- Income Exclusion Under Temporary Census Employment and Census Access (PIH 2017–05)
- Passbook Savings Rate Effective February 1, 2016 (H 2016–01)
- Amendment to the Definition of Tuition (PIH 2015–21/H 2015–12)
- Guidance on Verification of Excluded Income (PIH 2013–04 (HA))
- Establishing the Passbook Savings Rate (PIH 2012–29)
- Housing Choice Voucher – Homeownership Option 10 Year Asset Exclusion (PIH 2012–03)
- Income Exclusion of Kinship, Kin-GAP and Other Guardianship Care Payments (PIH 2012–01 (HA))

Streamlining Administrative Practices in the Housing Choice Voucher program (Notice PIH 2012–15) is still useful for PHAs who are streamlining their programs. Numerous provisions in that notice are no longer applicable or additional flexibilities have been offered through more recent PIH notices. As it relates to the HOTMA final rule, however, the notice includes numerous recommendations surrounding interim reexaminations and annual reexaminations that are no longer applicable. Therefore, HUD is rescinding PIH Notice 2012–15.

The following sections of Streamlining Program Regulations for Programs Administered by Public Housing Agencies (Notice PIH 2016–05) are rescinded:

C: "Exclusion of mandatory education fees from income"

E: "Earned income disregard"

F: "Family declaration of assets under $5,000"

N: "Family income and composition: regular and interim examinations"

The following Housing notices are partially rescinded by this notice:

- *Streamlining Administrative Regulations for Multifamily Housing Programs* (H 2016–09)
    - "24 CFR 5.216 – Verification of Social Security Numbers" (Section IV). This section of the notice states that an interim reexamination is required to add or update a household member's Social Security Number (SSN).
    - "24 CFR 5.609 – Definition Change – Exclusion of mandatory education fees from income" (Section VI). This section of the notice references the outdated income exclusion in 24 CFR § 5.609(b)(9).
- *Section 811 Project Rental Assistance (PRA) Occupancy Interim Notice* (H 2013–24)
    - "Annual Recertification" (Section IV.F). This section of the notice states that MFH Owners must conduct interim reexaminations as described in HUD Handbook 4350.3 REV-1, Chapter 7.
- *Enterprise Income Verification (EIV) System* (H 2013–06)
    - "Using EIV Reports" (Section VII). This section of the notice states that MFH Owners are required to use EIV Income Reports as a third-party source to verify a tenant's employment and income information during interim reexaminations.
    - "Use of EIV Reports" (Attachment 6). This attachment to the notice states that the use of EIV Reports (Income Report, Income Discrepancy Report, and Summary Report) is mandatory at interim reexaminations.

8. Paperwork Reduction Act

In accordance with the Paperwork Reduction Act of 1995 (44 U.S.C. 3501–3520), an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information, unless the collection displays a currently valid OMB control number. The information collection requirements of this notice were assigned OMB Control Numbers 2577–0169, 2577–0295, 2577–0083, 2502–0204, 2577–0226, 2577–0282.

For questions regarding this notice please contact MFH_HOTMA@hud.gov for Multifamily Housing program questions or HOTMAQuestions@hud.gov for PIH program questions.

Julia Gordon

Julia R. Gordon
Assistant Secretary for Housing —
Federal Housing Commissioner

Richard J. Monocchio

Richard J. Monocchio
Principal Deputy Assistant
Secretary
for Public and Indian Housing

TABLE OF CONTENTS

ATTACHMENT A: TOPIC: ASSET LIMITATION

Regulations

24 CFR §§ 5.100 (real property); 5.603; and 5.618

Applicable Programs

HUD Multifamily Housing	HUD Multifamily Housing	Public and Indian Housing
Section 8 (Project Based Rental Assistance), Section 202/8	Section 202/162 PAC, Section 202/811 PRAC, Section 236 IRP, Section 811 PRA, SPRAC	HCV (including Project-Based vouchers), Public Housing, Section 8 Moderate Rehabilitation, Section 8 Moderate Rehabilitation SRO
Yes	No	Yes

Summary

For the Public Housing and Section 8 programs (including PBRA and HCV), PHAs/MFH Owners must deny admission of an applicant if they are determined to not meet the requirements of the asset limitation (see paragraph A.1 and A.2 below).

PHAs/MFH Owners have discretion with respect to application of the asset limitation at annual and interim reexamination, as discussed in paragraph A.3 below. For the purpose of reexaminations, paragraph A.1 does not apply to PHAs/MFH Owners who establish total non-enforcement policies as described in paragraph A.3.a of this attachment.

Subtopics

A.1 Asset Limitation

This section describes the asset limitation. The enforcement options are described in subsequent paragraphs A.2. and A.3. A family is out of compliance with the asset limitation if they have either of the following:

- **Net family assets that exceed $100,000, as adjusted annually for inflation.** See Attachment F (paragraph F.4.a) (Determining Net Family Assets) of this notice for the definition of net family assets. HUD will adjust this amount annually in accordance with the Consumer Price Index–Urban Wage Earners and Clerical Workers (CPI–W). See Attachment H (Inflationary Adjustments) of this notice for more information on inflationary adjustments. In determining whether the net family assets for a family exceed $100,000 (as adjusted for inflation), a PHA/MFH Owner may accept a declaration from the family that their net assets do not exceed $50,000 (as adjusted for inflation), without needing to further verify that declaration. See Attachment F (paragraph F.7) (Self-Certification of Net Family Assets Equal to or Less Than $50,000 (as adjusted by inflation)) of this notice. For assets disposed of for less than fair market value during the two years preceding the date of application for the program or reexamination, as applicable, the difference in value between the consideration received and the fair market value must be included in net family assets.

- **Real property that is suitable for occupancy.** Real property means "real property as provided under the State law in which the property is located."[A1] Families are out of compliance if they have a present ownership interest in, a legal right to reside in, and the effective legal authority to sell a property (based on laws of the state or locality in which the property is located) that is suitable for occupancy by the family as a residence. However, there are several exemptions to the real property restriction, discussed below in paragraph A.4.a (Exemptions to the Real Property Restriction in the Asset Limitation). In determining whether the family owns real property that would make them out of compliance, a PHA/MFH Owner may rely upon a self-certification, both at the time of admission and at reexamination, from the family stating that they do not have any present ownership interest in any real property. A PHA/MFH Owner could use a form that requests certification of the family's present ownership interest in the property, and also inquire about the family's legal right to reside in, and the effective legal authority to sell any real property that is suitable for occupancy by the family. If the family certifies that they do not have any present ownership interest in real property, the PHA/MFH Owner may take that as sufficient to determine the family is not out of compliance with the real property restriction. However, if the family owns real property, the PHA/MFH Owner must seek third-party verification of the family's legal right to reside in the property, the effective legal authority to sell the property, and whether the property is suitable for occupancy by the family as a residence.

Note: Ownership of real property is relevant to the asset limitation in two distinct ways: 1) if the family has an ownership interest in real property, that interest may cause the family's net family assets to exceed $100,000 (adjusted for inflation), in which case the family is out of compliance; and 2) if the family has a present ownership interest in, a legal right to reside in, and the effective legal authority to sell a property that is suitable for occupancy by the family as a residence, then the family is out of compliance. There are several exemptions to the real property restriction at § 5.618(a)(1)(ii), discussed in paragraph A.4.a, which identify when a real property ownership interest does not by itself render the family out of compliance with the asset limitation. However, those exemptions do not indicate that such real property is excluded from the calculation of net family assets. Unless the real property is specifically excluded from net family assets in the definition under § 5.603, it may be included in net family assets. If the value of that real property brings the net family assets above $100,000 (as adjusted for inflation), the family will be out of compliance.

A.2 Compliance at Admission

At admission, ownership of net family assets that exceed $100,000 (as adjusted) or ownership of disqualifying real property require denial of assistance. PHAs/MFH Owners do not have the discretion to not enforce or provide limited enforcement of the asset limitation at admission.

With respect to MFH programs only, MFH Owners must enforce the asset limitation at initial certification for families who lost their assistance because they failed to recertify

[A1] Real Property as defined in 24 CFR § 5.100.

timely or began to pay market rent, remained in the unit, and then lost income, once again requiring assistance.

Note: Families residing in units converting to Section 8 PBRA or PBV through the Rental Assistance Demonstration (RAD) may not be rescreened upon conversion pursuant to the RAD statute; therefore, RAD families converting to PBRA or PBV are not subject to the asset limitation provision **at conversion.** Instead, families residing in units converting under the First or Second Component of RAD to PBRA (including units originally assisted under the Section 202/811 PRAC program) or PBV will be subject to the PHA/MFH Owner's discretionary asset limitation policies at their next annual or interim reexamination after conversion, whichever is sooner.

A.3 PHA/MFH Owner Discretion at Annual and Interim Reexamination

PHAs/MFH Owners have discretion with respect to the application of the asset limitation at annual and interim reexamination. PHAs/MFH Owners may adopt a written policy of total non-enforcement, enforcement, or limited enforcement, as described below. They may also adopt exception policies as described in A.3.d.

Regardless of the policy they adopt, PHAs/MFH Owners must comply with federal fair housing and civil rights requirements, including reasonable accommodation requirements. This obligation applies regardless of whether PHAs/MFH Owners establish enforcement, limited enforcement, or exception policies to the asset limitation at reexamination. This may mean, for example, that a PHA/MFH Owner would be required to allow someone to cure their noncompliance or provide more time to demonstrate they have cured their noncompliance before terminating assistance if there was a nexus between the person's disability and their need to cure or their need for additional time to demonstrate they have cured their noncompliance. A reasonable accommodation could require delaying the initiation of termination or eviction proceedings for more than six months.

A.3.a Total Non-Enforcement

At annual and interim reexamination, PHAs/MFH Owners may choose not to enforce the asset limitation, if they establish a written non-enforcement policy. PHAs/MFH Owners may establish a total non-enforcement policy for all families at reexaminations, which would mean that they will not initiate termination or eviction proceedings for a family for non-compliance with the asset limitation. Where the PHA/MFH Owner exercises this discretion to allow families who would otherwise fail to comply with the asset limitation to continue renting their units, the families will continue to receive assistance. If they adopt a total non-enforcement policy, PHAs/MFH Owners must apply the non-enforcement policy the same for all families within a program (e.g., if adopted in a PHA's Admissions and Continued Occupancy Policy, it must apply to all Public Housing families). Any non-enforcement policy must be included in the PHA's Administrative Plan or ACOP or a MFH Owner's Tenant Selection Plan.

Note: PHAs/MFH Owners who adopt a total non-enforcement policy are still required to calculate net family assets in the manner required by § 5.603, as part of the process of calculating annual income in accordance with § 5.609. In the course of calculating net family assets, PHAs/MFH Owners thus still need to determine whether the family owns real property that must be included in net family assets. However, if they adopt a total non-enforcement policy, they are not required to obtain and verify additional information about owned real property strictly to determine whether it qualifies for an exemption under § 5.618 (e.g., whether owned real property is suitable for occupancy). For example, if a PHA/MFH Owner finds a family owns real property, that real property would need to be included in the calculation of net family assets unless it is specifically excluded by § 5.603, but the PHA/MFH Owner would not need to inquire whether it was suitable for occupancy.

A.3.b Enforcement

PHAs/MFH Owners may choose to enforce the asset limitation at reexamination. PHAs/MFH Owners with an enforcement policy at reexamination must initiate termination or eviction proceedings within six months of the income examination that determined the family was out of compliance. They may delay the initiation of termination or eviction proceedings for noncompliant families for up to but no longer than six months. See paragraph A.4 on the features that determine whether owned real property renders the family out of compliance with the asset limitation. See paragraph A.5 on how requirements to initiate termination or eviction proceedings vary by program.

Any enforcement policy, including the amount of time that a PHA/MFH Owner will delay the initiation of termination or eviction proceedings for noncompliant families, must be included in the PHA’s Administrative Plan or ACOP or a MFH Owner’s Tenant Selection Plan.

A.3.c Limited Enforcement: Option to Cure

PHA/MFH Owners may alternatively adopt a written policy of limited enforcement, which would differ from total enforcement of the asset limitation at reexamination in only one regard: all families who are found to be out of compliance at reexamination would be provided the same opportunity to come back into compliance. Families would have up to but no longer than six months, depending on the limited enforcement policy that the PHA/MFH Owner adopts, to demonstrate that they have come back into compliance. If the family does demonstrate they have come back into compliance within that period, the PHA/MFH Owner would not initiate termination or eviction proceedings.

Limited enforcement policies cannot provide families more than six months to come back into compliance and do not extend the period of time the PHA/MFH Owner may delay initiation of termination or eviction proceedings; the PHA/MFH Owner may still only delay initiation of termination or eviction proceedings for the family for a period of not more than six months. (In the case of a reasonable accommodation, a family may be afforded more than six months to comply.) See paragraph A.4 on the features that determine whether owned real property renders the family out of compliance with the asset limitation.

If the PHA/MFH Owner has adopted a limited enforcement policy, that policy must address the timeframe for curing non-compliance (e.g., families will have six months to demonstrate they have cured non-compliance with the asset limitation). In establishing a limited enforcement policy, PHAs/MFH Owners may choose to allow an opportunity to cure non-compliance that is less than six months. Any limited enforcement policy, including the amount of time that a PHA/MFH Owner will delay the initiation of termination or eviction proceedings for families who do not demonstrate compliance, must be included in the PHA's Administrative Plan or ACOP or a MFH Owner's Tenant Selection Plan.

What families must do to cure non-compliance depends on why they were identified as out of compliance. Families could cure non-compliance by removing prohibited assets — for example, by selling real property or bringing net family assets below $100,000 (as adjusted for inflation). However, the value of assets disposed of for less than fair market value would still be counted in the family's net family asset total in the two years preceding the date of application for the program or reexamination. See Attachment F (paragraph F.4.a) for a discussion of what constitutes a disposition of assets for less than fair market value.

If the family is non-compliant with the asset limitation because of a present ownership interest in real property, but their net family assets do not exceed $100,000 (adjusted for inflation), they can cure non-compliance by demonstrating that either they no longer own the prohibited asset or that it now qualifies for an exemption (e.g., because the family is now offering it for sale), so long as the family's net family assets do not exceed $100,000 (adjusted for inflation) after such action is taken. (Note, however, that offering real property for sale does not thereby exclude the real property from the calculation of net family assets.)

A family with more than $100,000 (as adjusted annually for inflation) in net family assets may bring their assets below the threshold in several ways. The family could purchase something that is not counted among net family assets, such as necessary personal property (e.g., a car used for everyday transportation). Alternatively, the family may cure non-compliance by moving assets such that they are no longer counted among net family assets, so long as doing so is not counted as disposing of assets for less than fair market value. In some circumstances, the family may transfer funds into a retirement plan recognized as such by the Internal Revenue Service (e.g., an individual retirement arrangement, employer retirement plan, or retirement plan for self-employed individuals), if the account is held by a member of the family. An asset moved to a retirement account held by a member of the family is not considered an asset disposed of for less than fair market value. Likewise, the family may be able to move funds into an irrevocable trust for the benefit of someone in the assisted family.

When PHAs/MFH Owners have a limited enforcement policy and the family demonstrates they have cured non-compliance, PHAs/MFH Owners must record the curing of a family's ineligibility in the family's file and permit families to remain in the program. The related updates to the family's income and assets would be processed at the next reexamination, which may be an interim if the family's circumstances meet the threshold for processing such a reexamination, or it may be the next annual reexamination. See Attachment I (Interim Reexaminations) of this notice.

A.3.d Exception Policies

At annual and interim reexamination, PHAs/MFH Owners may also establish exceptions to the asset limitation (not at admission or initial certification where the family is being rescreened for assistance). If the PHA/MFH Owner has adopted a written exception policy for reexaminations, then families in the specified exception categories will receive either total non-enforcement or limited enforcement, depending on the exception policy the PHA/MFH Owner has adopted. Families in the specified exception categories would either (a) not be subject to termination or eviction proceedings due to non-compliance with the asset limitation at a reexamination, or (b) they would be provided an opportunity, up to but no longer than six months, to come back into compliance, after which point the asset limitation would be enforced. An exception policy may be combined with a limited enforcement policy for all other families not in the exception categories, as described below.

PHAs/MFH Owners are permitted to include more than one exception as part of any exception policy. Exception policies may be based on family type and may take into consideration such factors as age, disability, income, the ability of the family to find suitable alternative housing, and whether supportive services are being provided[A2]. All exception policies must comply with civil rights and fair housing statutes and requirements, including but not limited to requirements identified in 24 CFR § 5.105(a).

Limited exception policies, which establish an opportunity to cure non-compliance, cannot provide families more than six months to cure these conditions. (In the case of a reasonable accommodation, a family may be afforded more than six months to comply.) If they have adopted such a policy, PHAs/MFH Owners must initiate termination or eviction proceedings for families who remain in non-compliance with the asset limitation within six months of the reexamination at which the non-compliance was determined. In establishing a limited exception policy, PHAs/MFH Owners may choose a period of delay that is less than six months.

PHAs/MFH Owners may choose to combine a limited enforcement policy (which applies to all families) with an exception policy for families in the specified exception categories. For example, they may adopt a limited enforcement policy that provides all families a window of six months to cure non-compliance with the asset limitation, and they may simultaneously adopt an exception policy that provides that the asset limitation will not be enforced at all at annual and interim reexaminations for families in the exception categories. PHAs/MFH Owners could alternatively adopt a limited enforcement policy for all families that provides a window of less than six months to cure non-compliance, alongside a

[A2] Sec. 104(e)(5) of P.L.114-201 (HOTMA).

limited exception policy that allows families in the exception categories a longer period of time (up to but no longer than six months) to cure non-compliance.

Any exception policy must be included in the PHA's Administrative Plan or ACOP or a MFH Owner's Tenant Selection Plan. The exception policy must describe whether excepted families are subject to total non-enforcement or limited enforcement.

Example A1: Asset Limitation Exception Policies

Sample Policy A: For all families that meet the definition of extremely low income at reexamination and are found to be non-compliant with the asset limitation, the PHA/MFH Owner will not enforce the asset limitation at reexamination. Such families will not be subject to termination or eviction proceedings due to non-compliance with the asset limitation at reexamination. All other families will be subject to a limited enforcement policy and provided six months to cure noncompliance.

Sample Policy B: For all families that meet the definition of extremely low income at reexamination and are found to be non-compliant with the asset limitation, the PHA/MFH Owner will not enforce the asset limitation at reexamination. Such families will not be subject to termination or eviction proceedings due to non-compliance with the asset limitation at reexamination. All other families will be subject to the enforcement policy.

Sample Policy C: Families with an elderly family member or a member with a disability will be given six months to cure their non-compliance with the asset limitation, as stated in the PHA/MFH Owner's policies. All other families will be subject to a limited enforcement policy and provided four months to cure noncompliance.

Sample Policy D: Families with an elderly family member or a member with a disability will be given six months to cure their non-compliance with the asset limitation, as stated in the PHA/MFH Owner's policies. All other families will be subject to the enforcement policy.

A.4 Real Property Determination

At admission and at reexamination, if the PHA/MFH Owner is enforcing the asset limitation, including limited enforcement, and a family declares that they have a present ownership interest in real property, then the PHA/MFH Owner must determine whether the property qualifies for an exemption as described in paragraph A.4.a (Exemptions to the Real Property Restriction in the Asset Limitation), whether the family lacks a legal right to reside in the real property as described in paragraph A.4.b (Legal Right to Reside in the Real Property), whether they lack the effective legal authority to sell the real property as described in paragraph A.4.c (Effective Legal Authority to Sell the Real Property), or whether the real property is unsuitable for occupancy as described in paragraph A.4.d (Suitability of Real Property for Occupancy). If the PHA/MFH Owner finds that any of these four things are true, then the family's present ownership interest in real property does not itself mean the family is out of compliance with the asset limitation. The type of third-party documentation that will be used to verify the disposition of a family's real property may vary by a family's circumstances and the locality in which the real property is located.

A.4.a Exemptions to the Real Property Restriction in the Asset Limitation

The real property restriction does not apply to the following:

- Any property for which the family is receiving assistance under 24 CFR § 982.620 (i.e., a manufactured home owned by a family who receives assistance to lease the space or lot in which it is located). Likewise, any property for which the family is receiving assistance under the Homeownership Option in 24 CFR Part 982. See 24 CFR § 5.618(a)(1)(ii)(A).
- Any property jointly owned by a family member and another individual who does not live with the family but who resides at the jointly owned property. See 24 CFR § 5.618(a)(1)(ii)(B).
- Any property owned by a family that includes a person who is a victim of domestic violence, dating violence, sexual assault, or stalking, as those terms are defined in 24 CFR Part 5 (Subpart L). For example, if the victim is a minor, the real property limitation does not apply to any property owned by the victim's parent or guardian. When a family requests an exemption from the real property limitation on this basis, the PHA/MFH Owner must accept self-certification and follow the confidentiality and documentation-request requirements established at 24 CFR § 5.2007. See 24 CFR § 5.618(a)(1)(ii)(C).
- Any property that the family is offering for sale. Documentary evidence of the sales process could include, for example, a contract with a real estate agent or a current real estate listing. See 24 CFR § 5.618(a)(1)(ii)(D).

A.4.b Legal Right to Reside in the Real Property

The real property restriction applies only when the family has the legal right to reside in the real property. Whether a family has the legal right to reside in a property may be dependent on state and local law. The family may own real property that legally they may not reside in. For example, the family may own a commercial property, such as a convenience store or other retail establishment, which cannot be occupied as a place of residence by the family. Families who claim they lack the legal right to reside in the real property must provide evidence to support their claim(s). What constitutes sufficient evidence will vary by circumstance.

A.4.c Effective Legal Authority to Sell the Real Property

The real property restriction applies only when the family has the effective legal authority to sell the real property, based on the laws of the state or locality in which the property is located. There may be multiple reasons why a family does not have such legal authority. For example, when families are contesting ownership of a property in court, or an individual is in divorce proceedings, they may be unable to sell the property until the completion of those proceedings. Someone who owns heirs' property may not have the authority to sell until others' claims to fractional ownership have been settled. Families who claim they lack the legal authority to sell the real property must provide evidence to support their claim(s). What constitutes sufficient evidence will vary by circumstance. For example, a divorce pleading or complaint may demonstrate that there are actual divorce proceedings occurring.

A.4.d Suitability of Real Property for Occupancy

A property will be considered suitable for occupancy unless the family demonstrates that the real property meets one of the following five conditions (24 CFR § 5.618(a)(2)):

- The property is not capable of meeting the disability-related needs of all members of the family (e.g., does not meet physical accessibility requirements, family has disability-related need for additional bedrooms, family needs proximity to accessible transportation). Documentary requirements to establish disability-related needs must comply with applicable fair housing and civil rights requirements.
- The property is not sufficient for the size of the family. A PHA/MFH Owner's occupancy standards may be used for such a determination.
- The property is geographically located so that it creates a hardship for the family (e.g., the distance or commuting time between the property and the family's place of work or school would place a hardship on the family, as determined by the PHA/MFH Owner. Distance or commute time to school/work are illustrative, but not exhaustive, examples of geographic hardships). Through written policies, PHAs/MFH Owners may set parameters on what constitutes such a hardship, but they must consider the specific circumstances of the family, including information provided by the family, in making a determination.
- The property is not safe to reside in because of its physical condition (e.g., the property's physical condition poses a risk to the family's health and safety and the condition of the property cannot be easily remedied). Unsafe property conditions could include external circumstances or environmental factors outside the control of the family. The property may be deemed not suitable for occupancy if the alterations that would be needed to make it safe to live in are cost prohibitive.
- The family does not have the legal right to reside in the property.

A.5 Special Considerations for Terminating Assistance or Evicting Families for Non-Compliance with the Asset Limitation

Even if PHAs/MFH Owners do not adopt a non-enforcement or limited enforcement policy and/or exception policy, they may delay for a period of up to six months the initiation of termination or eviction of assistance proceedings. They are not required to initiate termination or eviction of assistance proceedings immediately upon determining the family is out of compliance with the asset limitation, nor are they required to begin the proceedings during the six-month period in order to have a termination of assistance or eviction completed at the six-month mark. PHAs/MFH Owners are encouraged to set policies for the initiation of termination or eviction of assistance proceedings that provide families adequate opportunity to find new housing.

What it means to initiate termination or eviction of assistance proceedings due to non-compliance with the asset limitation will vary by program:

- In the Section 8 Project-Based Rental Assistance program, including the Section 202/8 program, participants who are not compliant with the asset limitation must either pay the contract rent for the unit or vacate the unit after termination of assistance.
- In the Housing Choice Voucher program, participants who are not compliant with the asset limitation are subject to termination of assistance, but there is no requirement that the unit owner initiate eviction because of non-compliance with the asset limitation.
- In the Public Housing program, participants who are not compliant with the asset limitation are subject to termination of assistance and eviction from the unit, if they fail to vacate the unit voluntarily. There is no general provision that allows such families to remain and pay an alternative rent.
- In the Section 8 Project-Based Voucher program, participants who are not compliant with the asset limitation are subject to termination of assistance. The PHA and owner may agree to remove the unit from the HAP contract, at which point the unit becomes an unassisted unit, and the owner may choose to allow the family to stay and pay the market rent. (The owner may charge the family a rent that is below-market rate, in which case it would be considered a landlord-assisted unit for rent reasonableness purposes.) When the family subsequently vacates the unit, the unit may be added back to the HAP contract. If the project is partially assisted, the PHA and owner may substitute a different unit for the unit removed due to the ineligibility of the tenant, consistent with the requirements for adding units to the HAP contract. Alternatively, if the owner refuses to agree to remove the unit from the HAP contract, the owner must evict the family, if they fail to vacate the unit voluntarily. In this case, the owner may not enter into a new lease with the now-ineligible family for that PBV-assisted unit, and the PBV unit must be leased to an eligible family.
- In the Section 8 Moderate Rehabilitation program, participants who are not compliant with the asset limitation are no longer eligible for assistance. 24 CFR § 882.512 expressly allows that families who were eligible at admission but subsequently become ineligible may remain in HAP contract units. However, if the owner fails to have at least 90 percent of the assisted units leased or available for leasing by eligible families, the PHA may reduce the number of units covered by the HAP contract. The PHA will agree to an amendment of the HAP contract to provide for subsequent restoration of any reduction in units if the PHA determines that the restoration is justified by demand, the owner otherwise has a record of compliance with obligations under the HAP contract, and contract authority is available.

PHAs/MFH Owners must follow program procedures for terminating assistance or tenancy. For example, for Public Housing families, when the PHA initiates the eviction and termination process, the PHA must provide a lease termination notice of 30 days unless a state or local law requires a longer notice period, and the family must be provided an opportunity for a hearing under the PHA administrative grievance procedure.

A.6 Required Policy Updates to Administrative Plans, ACOPs, and Tenant Selection Plans

A.6.a Admission Policies

PHAs/MFH Owners must establish written screening criteria in their Administrative Plans, ACOPs, or Tenant Selection Plans, as applicable, to prohibit the admission of applicants who own net family assets that exceed $100,000 (as adjusted for inflation) and/or real property that is suitable for occupancy. Policies should indicate the general parameters PHAs/MFH Owners will use when determining whether the location of real property constitutes a geographic hardship.

A.6.b Reexamination Policies

Whether a PHA/MFH Owner chooses to adopt a total non-enforcement, enforcement, limited enforcement, and/or exception policy for reexaminations, that policy and accompanying details must be set forth in the PHA's ACOP or Administrative Plan or in a MFH Owner's Tenant Selection Plan, as applicable.

PHAs/MFH Owners must also update their Administrative Plans, ACOPs, or Tenant Selection Plans, as applicable, to indicate when they will initiate termination or eviction proceedings after participant families are determined to be out of compliance with the asset limitation, when the PHA/MFH Owner has established either an enforcement policy or policies to permit families to cure their noncompliance. PHAs/MFH Owners must initiate termination or eviction proceedings for families who remain out of compliance with the asset limitation within six months of the reexamination at which the non-compliance was determined. Policies should indicate the general parameters PHAs/MFH Owners will use when determining whether the location of real property constitutes a geographic hardship.

ATTACHMENT B: TOPIC: CALCULATING INCOME

Regulations

24 CFR §§ 5.609(c)(1); 5.609(c)(2); 5.609(c)(4); 5.657(f); 882.515; 882.515(f); 882.808; 882.808(i)(5); 891.105; 891.410(c); 891.410(g)(1); 891.410(g)(2); 891.610(c); 891.610(g)(1); 891.610(g)(2); 891.750(c); 960.257; 982.516; and 982.516(f)

Applicable Programs

HUD Multifamily Housing	HUD Multifamily Housing	Public and Indian Housing
Section 8 (Project Based Rental Assistance)	Section 202/162 PAC, Section 202/8, Section 202/811 PRAC, Section 236 IRP, Section 811 PRA, SPRAC	HCV (including Project-Based vouchers), Public Housing, Section 8 Moderate Rehabilitation, Section 8 Moderate Rehabilitation SRO
Yes	Yes	Yes

Summary

See each subtopic.

Subtopics

B.1 New Admissions and Interim Reexaminations

Regulations: 24 CFR §§ 5.609(c)(1); 882.515; 891.410(c) and (g)(2); 891.610(c) and (g)(2); 960.257; and 982.516

Summary: When calculating a household's income, including asset income, at the time of admission to the program or during interim reexaminations, PHAs/MFH Owners must use anticipated income (current income) (i.e., the family's estimated income for the upcoming 12-month period). This requirement is consistent with the pre-HOTMA process for conducting income examinations at admission and for interim reexaminations.

B.2 Annual Reexaminations

Regulations: 24 CFR §§ 5.609(c)(2); 882.808; 891.410(g)(1); and 891.610(g)(1) 960.257; and 982.516

Summary: The final rule revises the standards for income calculation during annual reexamination.

PHAs/MFH Owners have the option of using a "safe harbor" income verification from another federal means-tested program to verify gross annual income. See Attachment J (paragraph J.4) (Determination of Income Using Other Means Tested Public Assistance (i.e., "Safe Harbor")) of this notice for an example of how to calculate annual income using the safe harbor method.

During annual reexaminations, except where the PHA/MFH Owner uses a streamlined income determination under 24 CFR §§ 5.657(d), 960.257(c), or 982.516(b) (see Attachment I (paragraph I.8) (Streamlined Income Determination)), PHAs/MFH Owners must first determine the family's income for the previous 12-month period and use this amount as the family income for annual reexaminations; however, adjustments to reflect current income must be made. Any change of income since the family's last annual reexamination, including those that did not meet the threshold to process an interim reexamination of family income in accordance with the PHA/MFH Owner's policies and 24 CFR §§ 5.657(c), 960.257(b), or 982.516(c), must be considered. Income from assets is always anticipated, irrespective of the income examination type.

A change in income, for example, may be a loss of income or the addition of a new source of income. Changing to a different employer in the prior year does not necessarily constitute a change if the income earned from either employer is substantially the same. PHA/MFH Owners will look at the entirety of the family's unearned income and earned income from the prior year, in which earned income may have been one constant job or many different jobs that start and stop. Cost of Living Adjustments (COLA) to Social Security income and Social Security disability income are always considered changes to income because the COLA is an adjustment that automatically occurs annually by law.[B1] See Attachment B (paragraph B.3) of this notice for more information on the COLA. The three steps outlined below apply for both earned and unearned income.

Overview of Calculating Annual Income at Annual Reexamination

Step 1: Determine the annual income for the previous 12-month period as defined at 24 CFR § 5.609(a) and (b). If there have been no changes to income beyond this calculation, then this is the amount that will be used to determine the family's rental assistance.

The PHA/MFH Owner reviews the following information to determine prior-year income:

- The EIV Income Report (must be pulled within 120 days of the effective date of the annual reexamination to be considered current);
- The income reported on the most recent reexamination HUD–50058/HUD–50059; and
- What the family certified to on the PHA/MFH Owner's current annual reexamination paperwork for prior-year income, if available.

Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination.

- If an interim reexamination was performed within the reexamination cycle and there are no additional changes, the PHA/MFH Owner must use the annual income from the interim reexamination to determine the family's rental assistance. The PHA/MFH Owner may use the verification obtained from the interim reexamination for this step.
- If the PHA/MFH Owner did not perform an interim reexamination or if the family reports that there have been changes since the last reexamination, move to Step 3.

[B1] P.L. 92–336: https://www.govinfo.gov/content/pkg/STATUTE-86/pdf/STATUTE-86-Pg406.pdf#page=16.

Step 3: If there were changes in annual income not processed by the PHA/MFH Owner since the last reexamination, use current income.

- Family reports their income for the prior year and whether there have been permanent changes.

If there are no reported changes to an income source, the PHA/MFH Owner may use documentation of prior-year income to calculate the annual income used for the current annual reexamination HUD–50058/HUD–50059. For example, the PHA/MFH Owner could use the following documentation :

- EIV + self-certification (wages, Supplemental Security Income (SSI), Social Security, and unemployment)
- Current level 4[B2] documents verifying prior-year income that are dated within the required timeframe (120 days of receipt by the PHA/MFH Owner), for example:
  - Year-end statement
  - Pay stub with year-to-date amount
  - Tax forms (Form 1040, W2, 1099, etc.)

If there are reported changes by the family or the PHA/MFH Owner notes discrepancies between EIV and what the family reports, follow the verification hierarchy to document and verify income. See Attachment J (paragraph J.5) (Verification Hierarchy) of this notice for information about verification.

Example B1: Calculating Annual Income at Annual Reexamination Using EIV

Background: Staff are processing the 3/1/2024 annual reexamination for Ruby Myers and her minor daughter, Georgia. No interim reexaminations have been processed, and Ruby has not reported any changes to annual income to the PHA/MFH Owner since the 3/1/2023 annual reexamination. The SSA published 2024 COLA is 3.2 percent.	
Last reexamination – 3/1/2023 Annual Reexamination	
Ruby: Wages: $30,000	Georgia: SSI: $10,980 ($915 monthly)
The EIV report pulled on 12/15/2023	
Ruby: Wages Total: $33,651 Quarter 3 of 2023: $8,859 (City Public School) Quarter 2 of 2023: $8,616 (City Public School) Quarter 1 of 2023: $8,823 (County Public School) Quarter 4 of 2022: $7,353 (County Public School)	Georgia: SSI Total: $10,980 2023 benefit $915 monthly

[B2] See Table J2.

Income Reported on Reexamination Application	
Ruby: Wages at City Public School: $32,000 (switched jobs but no permanent change to amount)	Georgia: SSI benefits: $10,980 (no changes in income)
Calculating Ruby's wages: Step 1: Determine prior annual income from EIV (i.e., Q4 2022 through Q3 of 2023: $33,651). Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination (in this case, there have been no interim reexaminations processed since the last annual reexamination). Step 3: Ruby certifies that the $33,651 of wages in EIV is accurate and reflects her current annual income, so the PHA/MFH Owner will use $33,651 for annual wages for the 3/1/2024 annual reexamination given there have been no additional changes to annual income.	Calculating Georgia's SSI benefit: Step 1: Determine the prior annual income from EIV (i.e., $915 x 12 months: $10,980). Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination (in this case, there have been no interim reexaminations processed since the last annual reexamination). Step 3: Ruby certifies the SSI income in EIV is accurate and reflects Georgia's current annual income. The PHA/MFH Owner must adjust the prior-year income (2023 SSI benefit) by the 3.2-percent COLA and will use this amount to calculate annual SSI income for the 3/1/2024 annual reexamination: COLA: $29.28 ($915 x 0.032 New gross SSI benefit: $11,331.36 ($944.28 x 12 months)
If Ruby did not agree with the annual wages reported in EIV, the PHA/MFH Owner would be required to verify her current income in accordance with HUD's verification hierarchy in Attachment J (paragraph J.5) (Verification Hierarchy) of this notice.	
Summary of Annual Income (as reported on the HUD–50058/HUD–50059)	
Ruby (Head of Household): Other Wage: $33,651	Georgia (Other Youth Under 18): SSI: $11,748
Myers Family Total Annual Income: $45,399	

Example B2: Calculating Annual Income at Annual Reexamination Using EIV: Family Disagrees with EIV

Background: Staff are processing Paul Hewson's 5/1/2024 annual reexamination. Since the last annual reexamination, Paul reported a decrease in annual income that exceeded 10 percent. Last year, Paul reported a decrease in earned income because he transferred from a full-time job at Sasha's Sweets to a part-time job at Viking Bakery. Following HUD's EIV verification hierarchy, staff confirmed Paul was no longer employed at Sasha's Sweets and decreased his anticipated annual income from $28,000 to $7,500 resulting from his new part-time employment at Viking Bakery; an interim reexamination was processed effective 7/1/2023. After the 7/1/2023 interim, Paul worked briefly at two different jobs, but he says he is no longer working and is not planning to work.
5/1/2023 Annual Reexamination

Wages: $28,000
Last Reexamination: 7/1/2023 Interim Reexamination Wages: $7,500
The EIV report pulled on 1/15/2024 Wages Total: $18,271 Quarter 3 of 2023: $2,500 (Viking Bakery) Quarter 3 of 2023: $796 (Sweet Tooth Candy Bar) Quarter 2 of 2023: $1,300 (Sasha's Sweets) Quarter 2 of 2023: $584 (Larry's Concessions) Quarter 2 of 2023: $2,401 (Viking Bakery) Quarter 1 of 2023: $6,500 (Sasha's Sweets) Quarter 4 of 2022: $600 (Sasha's Sweets) SS/SSI: No history of benefits.
Income Reported on Reexamination Application Wages: $0 (permanent change; no longer receiving) Social Security: $14,400 ($1,200 monthly) Paul certified on the PHA's annual reexamination paperwork that he does **not** agree with the annual wages of $18,271 reported in EIV and it is not reflective of his current anticipated annual income. He reported he is currently unemployed, and provided a copy of an award letter from the Social Security Administration to document that he will begin receiving a monthly disability benefit of $1,200 effective 3/1/2024.
Calculating Wages and SS Benefit Step 1: Determine prior annual income taking into consideration the 8/1/2023 interim reexamination (i.e., EIV wages reflected Q4 2022 through Q3 2023: $18,271) Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there was a 7/1/2023 interim that reduced wages to $7,500. Step 3: Obtain documentation to verify current income and confirm Paul is no longer employed at Viking Bakery or The Sweet Tooth Candy Bar (the employers reported in the most recent quarter of EIV). This step is necessary, because Paul did not agree with the EIV income report or income reported on the last interim reexamination. Paul reported that he is no longer working at all. Process the annual reexamination effective 5/1/2024 using annual SS income of $14,400 and $0 wages.

Summary of Annual Income (as reported on the HUD–50058/HUD–50059)
Paul (Head of Household): $14,400 (SS)
Hewson Family Total Annual Income: $14,400

Example B3: Calculating Annual Income at Annual Reexamination

<table>
<tr><td colspan="2">Background: Staff are processing the 11/1/2024 annual reexamination for Samantha and Fergus Poole, head of household and spouse. On 2/14/2024 Samantha reported her monthly child support payment was reduced from $200 to $100 per month, but an interim reexamination was not processed, because the reduction in child support income for Samantha's daughter, Hailey, did not result in a decrease of 10 percent or more in annual adjusted income, and the PHA/MFH Owner did not establish a lower threshold (see Attachment I, paragraph I.1). Samantha did not report any additional changes to the PHA/MFH Owner.</td></tr>
<tr><td colspan="2">Last reexamination – 11/1/2023 Annual Reexamination</td></tr>
<tr><td>Samantha:
Business income: $28,000
VA disability pension: $12,000
Child support: $2,400</td><td>Fergus:
Wages: $8,250
Other non-wage income: $3,000 (Go Fund Me online fundraiser)</td></tr>
<tr><td colspan="2">The EIV report pulled on 9/16/2024</td></tr>
<tr><td>Samantha:
Wages Total: $0 (no wage data reported since Q1 2023)</td><td>Fergus:
Wages Total: $8,600
Quarter 1 of 2024: $2,100 (Ian's Fish 'n' Chips)
Quarter 1 of 2024: $500 (Claire's Healthcare Supplies)
Quarter 4 of 2023: $1,000 (Claire's Healthcare Supplies)
Quarter 3 of 2023: $1,800 (The Onion Garden Shop)
Quarter 2 of 2023: $3,200 (Ivar's Fish Haus)</td></tr>
</table>

<u>Current Family Circumstances: Income Reported on Reexamination Application</u>

Samantha and Fergus reported how much income was earned/received in the previous 12-month period and noted permanent changes, where applicable, for each source of their income on PHA/MFH Owner's annual reexamination form. However, no information was reported by the family concerning other non-wage income. Fergus reported **only** wages and his current employment at Ian's Fish 'n' Chips for the annual reexamination. The family supplied the supporting documentation noted below to the PHA/MFH Owner for the 11/1/2024 annual reexamination.

Samantha:	Fergus:
Business income: $28,750 (last year); has decreased to $18,000 (permanent change)	Wages: $6,000
VA disability benefit: $12,000 (last year); has increased to $12,300 (permanent change)	
Child support: $2,400 (last year); has decreased to $1,200 (permanent change)	

<u>Calculating Samantha's Net Business Income</u>

Step 1: Determine prior annual *net business income* (i.e., $28,000 on last HUD–50058/HUD–50059).

Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there have been no interim reexaminations processed since the last annual reexamination.

Step 3: Adjust to reflect current **net business income**. Samantha reported on the annual reexamination application that business income permanently decreased to $18,000. The PHA/MFH Owner must obtain supporting documentation from Samantha that demonstrates current net business income. Samantha provided documentation that supported the current annual net business income is $18,000. Process the annual reexamination effective 11/1/2024 using annual **net business income** determined in Step 3.

<u>Calculating Samantha's VA Pension Income</u>

Step 1: Determine prior annual **VA pension income** (i.e., $12,000 supported by a VA award letter Samantha supplied that documents the prior year monthly VA pension was $1,000).

Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there have been no interim reexaminations processed since the last annual reexamination.

Step 3: The PHA/MFH Owner needs to adjust to reflect current **VA pension income**. Samantha supplies a VA award letter showing the COLA adjusted monthly pension of $1,025, or $12,300 annually. Process the annual reexamination effective 11/1/2024 using annual **VA pension income** determined in Step 3 ($12,300 in this example).

Calculating Samantha's Child Support Income
Step 1: Determine prior annual **child support income** (i.e., $2,400 on the last HUD–50058/HUD–50059). Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there have been no interim reexaminations processed since the last annual reexamination. The family reported a decrease from $200 to $100 monthly, but the change was not processed because it did not meet the threshold. Step 3: The family reported changes, so the PHA/MFH Owner must adjust to reflect current **child support income**. In this example, the family submitted a child support history report from the local child support office that documents regular $100 monthly child supports payments beginning 3/1/2024 through the current month. Process the annual reexamination effective 11/1/2024 using current annual **child support income** determined in Step 3 ($1,200 in this example).
Calculating Fergus's Wages
Step 1: Determine prior annual income from **wages** in EIV (i.e., Q2 2023 through Q1 of 2024: $8,600). Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there have been no interim reexaminations processed since the last annual reexamination. Step 3: There is a discrepancy between what the family reported and EIV, so the PHA/MFH Owner must verify and adjust to reflect current annual income from **wages**. Fergus reported $6,000 in annual income from wages on the annual reexamination from a single employer, Ian's Fish 'n' Chips. The PHA/MFH Owner projected annual income of $7,800 based on the two paystubs for this employer, and EIV shows $8,600 earned in the most recent four quarters in EIV. To complete Step 3, the PHA/MFH Owner must do the following: resolve the discrepancy between EIV wages, the $6,000 annual income Fergus reported, and the $7,800 projected based on the paystubs he provided, and verify he is no longer employed at Claire's Healthcare Supplies in accordance with HUD's verification hierarchy and local policies. The PHA/MFH Owner determined that Fergus reported his net vs. gross annual income from **wages,** which he corrected on the annual reexamination form to reflect his current gross annual income of $9,000. The PHA/MFH Owner verified Fergus was no longer employed at Claire's Healthcare Supplies and obtained two additional paystubs. Based on two current and consecutive paystubs, Fergus is now projected to earn $9,360 annually. Process the annual reexamination effective 11/1/2024 using income from **wages** determined in Step 3 ($9,360 in this example).
Calculating Fergus's Other Non-Wage Income
Step 1: Determine prior annual income from other **non-wage income** (i.e., $3,000 on the last HUD–50058/HUD–50059). Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there have been no interim reexaminations processed since the last annual reexamination. Step 3: The family did not report any non-wage income on the annual reexamination form, but it was included on the last HUD–50058/HUD–50059. The PHA/MFH Owner must verify and adjust to reflect current **non-wage income**. The PHA/MFH Owner must verify no income was received through a "Go Fund Me" online fundraiser so that it may be excluded. Fergus provided a self-certification that he hasn't solicited funds online and doesn't plan to in the following year; he also provided records from the account that documented no fundraising activity in the prior 12-month period. Process the annual reexamination effective 11/1/2024 using annual **non-wage income** of $0 determined in Step 3.

Summary of Annual Income (as reported on the HUD–50058/HUD–50059)	
Samantha (Head of Household):	Fergus (Co-head):
Own business: $18,000	Wages: $9,360
Pension: $12,300	
Child support: $1,200	
Poole Family Total Annual Income: $40,860	

B.3 Applying the Current SSA COLA at Next Annual and Interim Reexamination

Regulations: 24 CFR §§ 5.609(c)(2); 960.257; 982.516; and 891.105

Summary: Annually in October, the Social Security Administration (SSA) announces the cost-of-living adjustment (COLA) by which federal SS and SSI benefits are adjusted to reflect the increase, if any, in the cost of living as measured by the Consumer Price Index for Urban Wage Earners and Clerical Workers prepared by the Bureau of Labor Statistics. The purpose of the COLA is to ensure that the purchasing power of SS and SSI benefits are not eroded by inflation. The federal COLA does not apply to state-paid disability benefits. Additional information regarding the SSA COLA is available online at www.socialsecurity.gov.

Effective the day after SSA has announced the COLA, PHAs/MFH Owners are required to factor in the COLA when determining SS and SSI annual income for all annual reexaminations and interim reexaminations of family income that have not yet been completed and will be effective January 1 or later of the upcoming year.

Example B4: Adjusting the SS Benefit by the COLA

Elizabeth Peterson receives $500 a month (SS benefit). The PHA/MFH Owner is processing her annual reexam (in November 2023), which is effective 1/1/2024. The PHA/MFH Owner must determine annual SS income as follows:

- Current benefit amount: $500
- COLA: $16.00 ($500 x 3.2 percent [or 0.032])
- New gross SS benefit effective 01/01/2024: $516.00 ($500 current benefit + $16 COLA)
- Annual SS income effective 1/1/2024: $6,192 ($516 x 12)

B.4 De Minimis Errors

Regulations: 24 CFR §§ 5.609(c)(4); 5.657(f); 960.257(f); 982.516(f); 882.515(f); 882.808(i)(5); 891.105; and 891.655

Summary: PHAs/MFH Owners will not be considered out of compliance solely due to de minimis errors in calculating family income. De minimis errors occur when a PHA/MFH Owner's determination of a family's income deviates from the correct income determination by no more than $30 per month in monthly adjusted income (or $360 in annual adjusted income). HUD may revise the threshold amount that constitutes a "de minimis error" through rulemaking. PHAs/MFH Owners will not be issued a finding by

HUD or the Contract Administrator (MFH only) for de minimis errors in income calculation.

As PHAs/MFH Owners become aware of the existence of an income calculation error, they are obligated to correct the error(s) retroactive to the effective date of the action the error was made regardless of the dollar amount associated with the error. PHAs/MFH Owners must take corrective action to credit or repay a family if the family was overcharged tenant rent, including when PHAs/MFH Owners make de minimis errors in the income determination. Families will not be required to repay the PHA/MFH Owner in instances where the PHA/MFH Owner miscalculated income resulting in a family being undercharged for rent.

PHAs/MFH Owners must revise their Administrative Plans, ACOPs, and Tenant Selection Plans, as applicable, to reflect how they will repay or credit a family the amount they were overcharged as a result of the PHA/MFH Owner’s de minimis error in income determination.

PHA/MFH Owner Discretion: None.

Attachment C: Topic: Deductions and Expenses

Regulations

24 CFR §§ 5.603; 5.611(a)(1); 5.611(a)(2); 5.611(a)(3); 5.611(a)(3)(ii); 5.611(b)(1); 5.611(b)(1)(i); 5.611(b)(1)(ii); 5.611(c)(1); 5.611(c)(1)(D); 5.611(c)(2); 5.611(d); 5.611(e); 5.611(e)(2); and 891.105

Applicable Programs

HUD Multifamily Housing	HUD Multifamily Housing	Public and Indian Housing
Section 8 (Project Based Rental Assistance)	Section 202/162 PAC, Section 202/8, Section 202/811 PRAC, Section 236 IRP, Section 811 PRA, SPRAC	HCV (including Project-Based vouchers), Public Housing, Section 8 Moderate Rehabilitation, Section 8 Moderate Rehabilitation SRO
Yes	Yes	Yes

Summary

PHAs/MFH Owners must consider mandatory deductions when determining a family's annual adjusted income. PHAs may also consider additional (permissive) deductions to a family's annual income if established by a written policy in the PHA's ACOP or Administrative Plan.

Subtopics

C.1 Dependent Deduction

Regulation: 24 CFR § 5.611(a)(1)

Summary: Effective January 1, 2024, the dependent deduction amount is $480. This amount will be adjusted annually (see Attachment H) and applies to a family's next annual or interim reexamination after the annual adjustment, whichever is sooner. Not later than September 1 annually, HUD will publish the CPI–W adjusted dependent deduction to the HUDUser Web site.[C1] PHAs/MFH Owners must implement the adjusted dependent deduction for all income examinations that are effective on January 1 or later.

PHA/MFH Owner Discretion: None.

C.2 Elderly/Disabled Family Deduction

Regulation: 24 CFR § 5.611(a)(2)

Summary: Effective January 1, 2024, the elderly/disabled family deduction increases from $400 to $525 and applies to a family's next interim or annual reexamination, whichever is sooner, after the date on which the PHA/MFH Owner implements the new elderly/disabled family deduction. The amount of the deduction will be adjusted annually (see Attachment H). Not later than September 1 annually, HUD will publish the CPI–W adjusted elderly/disabled family deduction to the HUDUser Web site.

[C1] https://www.huduser.gov/portal/pdrdatas_landing.html.

PHA/MFH Owner Discretion: None.

C.3 Unreimbursed Health and Medical Care Expenses and Reasonable Attendant Care and Auxiliary Apparatus Expenses Deduction

C.3.a New Higher Threshold for Deducting Health and Medical Care Expenses and Unreimbursed Reasonable Attendant Care and Auxiliary Apparatus Expenses

Regulation: 24 CFR § 5.611(a)(3)

Summary: The final rule establishes that the sum of unreimbursed health and medical care and reasonable attendant care and auxiliary expenses that exceed 10 percent of the family's annual income can be deducted from annual income. Prior to January 1, 2024, the threshold was 3 percent of the family's annual income.

C.3.b New Definition of Unreimbursed Health and Medical Care Expenses and Reasonable Attendant Care and Auxiliary Apparatus Expenses Deduction

Regulation: 24 CFR § 5.603

Summary: Health and medical care expenses, as defined in 24 CFR § 5.603, include costs incurred for the diagnosis, cure, mitigation, treatment, or prevention of disease or payments for treatments affecting any structure or function of the body. Health and medical care expenses include medical insurance premiums and long-term care premiums that are paid or anticipated during the period for which annual income is computed. Medical insurance premiums continue to be eligible health and medical care expenses. However, health and medical care expenses may be deducted from annual income only if they are eligible and not otherwise reimbursed and may only be deducted for elderly or disabled families.

Although HUD revised the definition of health and medical care expenses to reflect the Internal Revenue Service (IRS) general definition of medical expenses, HUD is not permitting PHAs/MFH Owners to specifically align their policies with IRS Publication 502[C2] for determining which expenses are included in HUD's mandatory deduction for health and medical care expenses. IRS Publication 502, in some instances, may instruct that certain expenses are not to be considered medical expenses that would otherwise be allowed under HUD's definition of health and medical care expenses. PHAs/MFH Owners must review each expense to determine whether it is eligible in accordance with HUD's definition of health and medical care expenses.

PHA/MFH Owner Discretion: None.

C.3.c Unreimbursed Reasonable Attendant Care and Auxiliary Apparatus Expenses

Regulation: 24 CFR § 5.611(a)(3)(ii)

[C2] Publication 502 explains the itemized deduction for medical and dental expenses used for tax purposes, including what expenses, and whose expenses, can and cannot be included in figuring the deduction.

Summary: Auxiliary apparatus items can include, for example, expenses for wheelchairs, ramps, adaptations to vehicles, guide dogs, assistance animals, or special equipment to enable a person who is blind or has low vision to read, or type or special equipment to assist a person who is deaf or hard of hearing. Some examples of attendant care expenses can include teaching a person with disabilities how to perform day-to-day tasks independently like cleaning, bathing, doing laundry, and cooking. Attendant care can be 24-hour care, or care during sporadic periods throughout the day.

In order to claim the deduction for the cost of unreimbursed reasonable attendant care and auxiliary apparatus expenses, the family must include a person with a disability, and the expenses must enable any member of the family (including the member who is a person with a disability) to be employed. If the unreimbursed reasonable attendant care and auxiliary apparatus expense exceeds the amount earned by the person who was enabled to work, the deduction will be capped at the amount earned by that individual.

PHA/MFH Owner Discretion: None.

C.4 Hardship Exemptions for Health and Medical Care Expenses and Reasonable Attendant Care and Auxiliary Apparatus Expenses

Regulations: 24 CFR §§ 5.611(c)(1); 5.611(c)(1)(D); and 5.611(c)(2)

Summary: As stated in C.3.a, the threshold to deduct health and medical care expenses and reasonable attendant care and auxiliary apparatus expenses has been increased from an excess of 3 to an excess of 10 percent of annual income. Concurrently with this increase, the regulations provide financial hardship exemptions for unreimbursed health and medical care expenses, and for reasonable attendant care and auxiliary apparatus expenses for eligible families. A family will benefit from this hardship exemption only if the family has eligible expenses that can be deducted in excess of 5 percent of annual income. In order to claim **unreimbursed health and medical care expenses**, the family must have a head, co-head, or spouse that is elderly or a person with a disability. In order to claim **unreimbursed reasonable attendant care and auxiliary apparatus expenses**, the family must include a person with a disability, and the expenses must enable any member of the family (including the member who is a person with a disability) to be employed.

To initiate, extend,[C3] or conclude a hardship exemption only, PHAs/MFH Owners will process and submit a non-interim reexamination transaction as described in Attachment I (paragraph I.4) (Non-Interim Reexamination Transactions) of this notice.

Families may be eligible for relief under one of two categories; phased-in relief or general relief, as defined below.

Note: A family receiving phased-in relief may request to receive general hardship relief instead; **once a family chooses to obtain general relief, a family may no longer receive the phased-in relief.**

[C3] See paragraph C.6.e, below.

C.4.a Phased-In Relief

This section describes the phased-in relief for families affected by the statutory increase in the threshold to receive unreimbursed health and medical care and reasonable attendant care and auxiliary apparatus expense deductions from annual income.

All families who received a deduction for unreimbursed health and medical care and/or reasonable attendant care or auxiliary apparatus expenses based on their most recent income review prior to January 1, 2024, will begin receiving the 24-month phased-in relief at their next annual reexamination or interim reexamination, whichever occurs first after the date on which the PHA/MFH Owner implements the phased-in relief. Families who receive phased-in relief will have eligible expenses deducted that exceed 5 percent of annual income for 12 months. Twelve months after the 5 percent phase-in began, families will have eligible expenses deducted that exceed 7.5 percent of annual income for the immediately following 12 months. After the family has completed the 24 months phase-in at the lower thresholds, as described above, the family will remain at the 10 percent threshold, unless the family qualifies for relief under the general hardship relief provision.

When an eligible family's phased-in relief begins at an interim reexamination, the PHA/MFH Owner will need to process another transaction one year later to move the family along to the next phase. The transaction can be either an interim reexamination if triggered, or a non-interim reexamination transaction.

The following table demonstrates when the phased-in relief will begin and increase every 12 months during the 24-month phase-in period.

Table C1: Phased-in Relief Timing

Phased-in Relief Timing	In Excess Threshold Percentage for Families Receiving the Health and Medical Expenses and Reasonable Attendant Care and Auxiliary Apparatus Expense Deduction as of January 1, 2024	Reexamination Type
First annual reexamination or interim reexamination, whichever occurs first on or after the date on which the PHA/MFH Owner implements the phased-in relief.	5 percent	Annual or Interim Reexamination
Twelve months after the 5-percent phase-in began	7.5 percent	Annual Reexamination or Interim Reexamination If no Interim Reexamination is triggered, then the PHA/MFH Owner processes with a non-interim transaction.
Twelve months after the 7.5-percent phase-in began	10 percent	Annual Reexamination or Interim Reexamination If no Interim Reexamination is triggered, then the PHA/MFH Owner processes with a non-interim reexamination transaction.

Example C1: Phased-In Relief (Health and Medical Care Expenses and Reasonable Attendant Care and Auxiliary Apparatus Expenses)

Ms. Bell's annual reexamination is due on June 1, 2024. Her last annual reexamination was effective June 1, 2023, and she received a deduction for unreimbursed health and medical expenses. She did not have any interim reexaminations after her annual reexamination was completed. Ms. Bell's unreimbursed health and medical expenses were 8 percent of her annual income. For her annual reexamination effective June 1, 2024, the PHA determines that Ms. Bell's annual income is $10,000 and her unreimbursed health and medical expenses are $800 (8 percent of her annual income). Although Ms. Bell's unreimbursed health and medical care expenses are not in excess of the new 10-percent threshold to receive the deduction, since she was receiving a deduction for unreimbursed health and medical expenses on January 1, 2024, Ms. Bell is automatically eligible for the deduction pursuant to the phased-in hardship exemption. The PHA/MFH Owner will apply the phased-in relief threshold to deduct the expenses that exceed 5 percent of her annual income which is $300 ($800 - $500) for this reexamination. Since her expenses are more than 7.5 percent of her annual income, Ms. Bell will receive the benefit of the unreimbursed health and medical expense deduction until her next annual reexamination on June 1, 2025, or interim reexamination (whichever occurs first), when the threshold will be increased to 7.5 percent. Assuming her medical expenses are still $800, she will be able to deduct $50 ($800 - $750).

PHAs/MFH Owners **must** track the 24-month phase-period for each eligible family, even if a family's expenses go below the appropriate phase-in percentage, during the first or second 12-month phase-in period. The phase-in must continue for families who move with continued assistance in the HCV program or port to another PHA. The phase-in must also continue for families who move to another Public Housing unit at the same PHA, or who transfer internally to another unit within the same MFH property. The family must receive phased-in relief if they are determined to be eligible as of January 1, 2024.

The table below describes the potential phased-in relief outcomes based on a family's status in PIH and MFH programs:

Table C2: Phased-in Relief Outcomes According to Family's Status in Program for Multifamily Housing Program

Family's Status in Program	Is Family Receiving Phased-in Relief?	Outcome of Phased-in Relief	Required Documentation
Family's assistance is terminated in any program.	Yes	Phased-in relief ends upon termination. When readmitted, family's expense deduction will be calculated using the 10-percent threshold unless request for general relief is approved by the PHA/MFH Owner.	N/A. No documentation of phased-in relief is needed.
Public Housing: Family transfers PH units within the same PHA. Housing Choice Voucher: Family moves with continued assistance in the HCV program with the same PHA or ports to a new PHA. MFH: Family transfers units within the same MFH property and are not treated as a new admission.	Yes	Families must continue to receive the phased-in relief. The family will receive the remaining calendar months of the percentage phase-in in their new unit.	The PHA or MFH Owner will use the existing phase-in documentation to determine the remaining calendar months of the percentage phase-in.
Family is treated as a new admission under a different property/program (e.g., family moves from one MFH property to another MFH property, the family moves from Public Housing to the HCV program, etc.).	Yes	Unless the PHA/MFH has a written policy to continue the phased-in relief upon admission, the family's expense deduction will be calculated using the 10-percent threshold unless request for general relief is approved by PHA/MFH Owner.	If the PHA/MFH Owner elects to continue the phased-in hardship relief, then the following documentation is required: Copy of forms HUD–50058 or 50059 from the family showing phased-in relief. If the forms are unavailable, then the PHA/MFH Owner may

			obtain self-certification from family declaring effective date of 5-percent or 7.5-percent phase-in. The PHA/MFH Owner must document in the file the reason that the forms HUD-50058 or 50059 were unavailable.
Unit in which family resides converts to PBV or PBRA funding under the Rental Assistance Demonstration.	Yes	Families must continue to receive the phased-in relief. The family will receive the remaining calendar months of the percentage phase-in in their new unit.	Copy of forms HUD–50058 or 50059 from the family showing phased-in relief. If the forms are unavailable, then the PHA/MFH Owner may obtain self-certification from family declaring effective date of 5-percent or 7.5-percent phase-in. The PHA/MFH Owner must document in the file the reason that the forms HUD-50058 or 50059 were unavailable.

PHA/MFH Owner Discretion: PHAs/MFH Owners may establish a policy to continue the phased-in hardship relief for families who were eligible for relief as of January 1, 2024, and who are treated as new admissions under a different program.

C.4.b General Relief

This section describes when a family is eligible for general relief related to the health and medical care expense and reasonable attendant care and auxiliary apparatus expense deduction.

To receive general relief, a family must demonstrate that the family's unreimbursed health and medical care expenses or unreimbursed reasonable attendant care and auxiliary apparatus expenses increased, or the family's financial hardship is a result of a change in circumstances that would not otherwise trigger an interim reexamination.

Relief is available regardless of whether the family previously received an unreimbursed health and medical care expense deduction, unreimbursed reasonable attendant care and auxiliary apparatus expense deduction, are currently receiving phased-in hardship relief, or were previously eligible for either this general relief or the phased-in relief.

If a PHA/MFH Owner determines that a family is eligible for general relief, the family will receive a deduction for the sum of the eligible expenses that exceed 5 percent of annual income. The family's hardship relief ends when the circumstances that made the family eligible for the relief are no longer applicable or after 90 days, whichever comes earlier. However, PHAs/MFH Owners may, pursuant to their own discretionary policy, extend the relief for one or more additional 90-day periods while the family's hardship condition continues.

Example C2: General Relief (Health and Medical Care Expenses and Reasonable Attendant Care and Auxiliary Apparatus Expenses)

Mr. Beck's annual reexamination is due on August 1, 2024. In his last reexamination, he did not have any unreimbursed health and medical expenses and/or auxiliary and attendant care expenses. However, Mr. Beck has since been in a car accident, and he has increased eligible health and medical expenses equal to 6 percent of his annual income. On February 15, 2024, Mr. Beck asks the PHA/MFH Owner for a hardship exemption to allow him to receive a health and medical care expense deduction, which will help him cover his rent. The PHA/MFH Owner determines that the family Is eligible for general relief and an interim reexamination would not have otherwise been triggered. The PHA/MFH Owners processes a non-interim change that applies a health and medical expense deduction for the eligible expenses that exceed 5 percent of annual income for 90 days. The PHA/MFH Owner may extend the relief for one or more additional 90-day periods while Mr. Beck's hardship condition continues and may extend the exemption beyond 90 days if a policy for extending hardship relief is included in the written policy for the PHA/MFH Owner.

PHA/MFH Owner Discretion: PHAs/MFH Owners must establish written policies regarding the types of circumstances that will allow a family to qualify for a financial hardship and when such deductions may be eligible for additional 90-day extensions. PHAs/MFH Owners must develop policies requiring families to report if the circumstances that made the family eligible for the hardship exemption are no longer applicable.

Examples of circumstances constituting a financial hardship may include the following situations:

- The family is awaiting an eligibility determination for a federal, state, or local assistance program, such as a determination for unemployment compensation or disability benefits;
- The family's income decreased because of a loss of employment, death of a family member, or due to a natural or federal/state declared disaster; or
- Other circumstances as determined by the PHA/MFH Owner.

PHAs/MFH Owners must not conduct an interim reexamination to add, remove, or to extend a hardship exemption, unless another change experienced by the family triggers an interim reexamination under the applicable regulation or in accordance with the PHA/MFH Owner's discretionary policies on conducting interim reexaminations for adjusted income decreases that are less than ten percent. Instead, the PHA/MFH Owner will process and submit a non-interim reexamination transaction as described in Section 16.4 (Non-Interim Reexamination Transactions) of this notice.

C.5 Child-Care Expenses Deduction and Hardship Exemption to Continue Child-Care Expenses Deduction

Regulation: 24 CFR §§ 5.603 Child-Care Expenses and 5.611(d)

See also Attachment I (paragraph I.4) (Non-Interim Reexamination Transactions).

Summary: Under 24 CFR § 5.611(d), any reasonable child-care expenses necessary to enable a member of the family to be employed or to further their education are deducted from income. Reasonable child-care expenses are defined in 24 CFR § 5.603(a) and are expenses for the care of children (including foster children if the unreimbursed child-care expenses are paid from the family's annual income and not from another source, such as a stipend from the child welfare agency), under 13 years of age, when all the following statements are true:

- The care is necessary to enable a family member to be employed or to further his or her education (e.g., work, look for work, or further their education (academic or vocational)); and
- The expense is not reimbursed by an agency or individual outside the household.

The amount deducted must not exceed the amount of employment income that is included in annual income.

A family whose eligibility for the child-care expense deduction **is ending** may receive a hardship exemption to continue receiving a child-care expense deduction in certain circumstances when the family no longer has a member that is working, looking for work, or seeking to further their education, and the deduction is necessary because the family is unable to pay their rent.

When a family requests a hardship exemption to continue receiving a child-care expense deduction that is ending, the PHA/MFH Owner must recalculate the family's adjusted income and continue the child-care deduction if the family demonstrates to the PHA's/MFH Owner's satisfaction that the family is unable to pay their rent (see Attachment C (paragraph C.6.a) (Policy for Determination of the Family's Inability to Pay Rent)) because of loss of the child-care expense deduction and the child-care expense is still necessary even though the family member is no longer working, looking for work, or furthering their education. The hardship exemption and the resulting alternative adjusted income calculation must remain in place for a period of up to 90 days. The PHA/MFH Owner, at their discretion, may extend such hardship exemptions for additional 90-day periods based on family circumstances.

To initiate, extend or conclude a hardship exemption, PHAs/MFH Owners will submit a non-interim transaction code on form HUD–50058/HUD–50059, unless there is an accompanying event that triggers an interim reexamination.

Example C3: Hardship Exemption to Continue Child-Care Expense Deduction

Ms. Branch had been paying $250 per week for her child, Violet, to attend child care, while she was employed at a local coffee shop. Ms. Branch became unemployed when the coffee shop permanently closed. Ms. Branch has plans to enroll in college in two months. Although Ms. Branch has the availability to watch Violet, the child-care center has a long waiting list, and if Ms. Branch pulls Violet out temporarily, she would likely be without reliable child care when she starts college. Continuing to pay child-care expenses while not receiving earned income has made the family unable to pay their rent portion.

The PHA/MFH Owner determined that Ms. Branch met the hardship exemption criteria, as established in the MFH Owner's written policies, and is unable to pay rent. The PHA/MFH Owner will allow Ms. Branch to continue to receive the child-care expense deduction for 60 days as Ms. Branch is anticipated to enroll in college in the next two months.

PHA/MFH Owner Discretion: PHAs/MFH Owners must develop policies requiring families to report if the circumstances that made the family eligible for the hardship exemption are no longer applicable. PHAs/MFH Owners may extend hardship exemptions for additional 90-day periods based on family circumstances as stated in their written policies.

C.6 Hardship Policy Requirements

C.6.a Policy for Determination of the Family's Inability to Pay Rent

Regulation: 24 CFR § 5.611(e)

Summary: PHAs/MFH Owners must establish policies on how they define what constitutes a hardship (i.e., when a family is unable to pay rent, triggering eligibility for a hardship exemption).

PHA/MFH Owner Discretion: PHAs/MFH Owners have discretion to establish policies for the purpose of determining eligibility for general hardship relief for the health and medical care expense deduction and for the child-care expense hardship exemption. PHAs/MFH Owners must describe these policies in their ACOPs, Administrative Plans, or Tenant Selection Plans, as applicable.

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) is more than 45 percent (for example) 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. PHA/MFH Owners may use different percentage thresholds or methods for determining a family's inability to pay rent; the examples provided in this paragraph are for consideration purposes.

C.6.b Family Notification of Hardship Exemption

Regulation: 24 CFR § 5.611(e)(2)

Summary: PHAs/MFH Owners must promptly notify families in writing of the change in the determination of adjusted income and the family's rent resulting from the application of the hardship exemption. The written notice must also inform the family of the dates that the hardship exemption will begin and expire and the requirement for the family to report to the PHA/MFH Owner if the circumstances that made the family eligible for relief are no longer applicable. The notice must also state that the family's adjusted income and tenant rent will be recalculated upon expiration of the hardship exemption. PHAs/MFH Owners must provide families 30 days' notice of any increase in rent.

PHAs/MFH Owners are encouraged to communicate the availability of hardship exemptions and how to request a hardship to all applicants and families prior to beginning to comply with HOTMA.

PHA/MFH Owner Discretion: None.

C.6.c Family Notification of Hardship Exemption Denial

PHAs/MFH Owners must promptly notify families in writing if they are denied either an initial hardship exemption or an additional 90-day extension of the exemption. The notification must specifically state the reason for the denial.

C.6.d Family Notification of Hardship Exemption Termination

PHAs/MFH Owners must notify the family if the hardship exemption is no longer necessary and will be terminated because the circumstances that made the family eligible for the exemption are no longer applicable. The notice must state the termination date and provide 30 days' notice of rent increase, if applicable.

Example C4: Termination of Hardship Exemption

The Olivera family is currently receiving a hardship exemption for child-care expenses. The family received an interim reexamination to decrease their earned income when an adult family member went on unpaid medical leave. The family is unable to pay rent during this time but still needs child care while the adult family member is receiving physical therapy. The family subsequently reports to the PHA/MFH Owner that the adult family member will resume employment in 3 weeks on March 23, at which point the family will no longer need the child-care hardship exemption. When the hardship exemption ends, the PHA/MFH Owner will process an interim reexamination to add the family's earned income and restart the non-hardship child-care expense deduction. The PHA/MFH Owner has a policy to consider earned income increases following an interim reexamination due to a decrease in income (see Attachment I (paragraph I.2)).

The PHA/MFH Owner must notify the family in writing that the hardship exemption will be terminated effective March 23 and provide the family with 30 days' notice of any rent increase. The family's rent increase will be effective on May 1.

C.6.e Extension of Hardship Exemption for Additional 90-Day Period(s)

PHAs/MFH Owners may at their discretion extend hardship exemptions for additional 90-day periods if the hardship continues pursuant to the PHA/MFH Owner's hardship policies. This provision applies to families receiving hardship exemptions for the child-care expenses deduction and general hardship relief for health and medical care expenses and reasonable attendant care and auxiliary apparatus expenses.

PHA/MFH Owners may extend the hardship relief for as many 90-day periods as the hardship continues to affect the family. Policies for extending hardship relief for additional 90-day periods must be established in PHAs' Administrative Plans or ACOPs, and in MFH Owners' Tenant Selection Plans.

PHAs/MFH Owners must obtain third-party verification of the family's inability to pay rent or must document in the file the reason that third-party verification was not available. PHAs/MFH Owners must attempt to obtain third-party verification prior to the end of the 90-day period.

C.7 Additional (Permissive) Deductions

Regulation: 24 CFR § 5.611(b)(1)

Summary: A PHA may, but is not required to, establish an additional deduction or deductions from a family's annual income. These deductions are also known as "permissive deductions." Note that the public housing Operating Fund formula is not revised to account for any decrease in PHA revenue attributable to implementing permissive deductions. Likewise, the subsidy costs attributable to implementing permissive deductions will not be taken into consideration in determining the PHA's HCV renewal funding or moderate rehabilitation funding. PHAs that adopt permissive deductions are required to incorporate these policies as part of the Administrative Plan or ACOP, as applicable.

MFH Owners are not permitted to adopt permissive deductions.

PHAs can respond to community needs by establishing a wide range of permissive deductions, including permissive deductions to provide incentives for families to work. Program regulations do not specify what types of permissive deductions are allowable. PHAs operating the Public Housing program have previously adopted permissive deductions that incentivize or encourage self-sufficiency and economic mobility.

As examples, a PHA may adopt an income deduction based on the following:

- The amount earned by certain members of the family (e.g., all income earned by elderly family members, etc.);
- The amount earned by families having certain characteristics (e.g., all income earned by family members employed by nonprofit organizations, etc.);
- the amount received by families or members from guaranteed income programs offered by select states and local governments;
- The amount earned by families or members during a certain time period or from certain sources (e.g., all income earned by full-time dependent students between June-August, all income earned by family members employed by nonprofit organizations, etc.)
- The amount paid from the family's annual income, and not another source such as Medicaid or a child welfare agency, for unreimbursed health or medical expenses of a foster child or foster adult.

PHAs are still subject to federal nondiscrimination requirements, including the obligation to provide reasonable accommodations that may be necessary for households with family members with disabilities.

C.7.a. Additional (Permissive) Deductions: Public Housing Only

Regulation: 24 CFR § 5.611(b)(1)(i)

Summary: PHAs may continue to adopt additional deductions from annual income in the Public Housing program. Permissive deductions may be used to incentivize or encourage self-sufficiency and economic mobility. **A PHA that adopts such deductions will not be eligible for an increase in Capital Fund and Operating Fund formula grants based on the application of such deductions**, so the financial impact of implementing permissive deductions must be carefully evaluated. PHAs may adopt permissive deductions for Public Housing only if they have established a written policy for such deductions.

PHAs must put the total dollar amounts of any permissible deductions in column 8d and line 8e of the form HUD-50058.

PHA/MFH Owner Discretion: PHAs are not required to adopt permissive deductions, but any PHA establishing permissive deductions in the Public Housing program must create written policies in the PHA's ACOP. MFH Owners are not permitted to adopt permissive deductions.

C.7.b Additional (Permissive) Deductions: HCV and Moderate Rehabilitation Only

Regulation: 24 CFR § 5.611(b)(1)(ii)

Summary: When deciding whether to adopt a permissive deduction for the HCV program, the PHA will need to review its Housing Assistance Payments (HAP) funds utilization and projected leasing closely to ensure that enough HAP is available to support the number of families currently or planned to be leased. The costs attributable to permissive deductions will not be taken into consideration in determining the PHA's HCV renewal funding or Moderate Rehabilitation/SRO funding. A PHA must have sufficient funding to cover the increased HAP cost of the deductions.

For the HCV program, PHAs will be required to report any HAP spent on permissive deductions into VMS monthly. Additional guidance for reporting HAP spent on permissive deductions in VMS will be provided in the VMS Manual.

For Moderate Rehabilitation programs, PHAs will be required to report the additional subsidy cost as part of the Moderate Rehabilitation Year End Settlement they are currently required to submit to HUD.

Since permissive deductions will be excluded from the renewal calculation, PHAs may use outside funding to cover the cost. For example, the PHA may receive non-federal funding to cover the cost of a particular permissive deduction. This could also apply for research studies where the research director asks the PHA to exclude stipends or basic/guaranteed income amounts received during the study period, and the research study provides funding to the PHA to cover the cost.

PHA/MFH Owner Discretion: PHAs are not required to adopt permissive deductions, but any PHA establishing permissive deductions in the HCV or Moderate Rehabilitation/SRO programs must create written policies in the PHA's HCV Administrative Plans.

MFH Owners are not permitted to adopt permissive deductions.

ATTACHMENT D: TOPIC: APPLICABLE FAIR HOUSING AND CIVIL RIGHTS REQUIREMENTS

Regulations

24 CFR §§ 5.105(a), 8.6, 982.53; 28 CFR §§ 35.160 and 36.303

Applicable Programs

HUD Multifamily Housing	HUD Multifamily Housing	Public and Indian Housing
Section 8 (Project Based Rental Assistance)	Section 202/162 PAC, Section 202/8, Section 202/811 PRAC, Section 236 IRP, Section 811 PRA, SPRAC	HCV (including Project-Based vouchers), Public Housing, Section 8 Moderate Rehabilitation, Section 8 Moderate Rehabilitation SRO
Yes	Yes	Yes

Summary

While HOTMA did not revise existing Fair Housing or Civil Rights requirements, PHAs/MFH Owners are reminded to follow all applicable nondiscrimination and equal opportunity requirements at 24 CFR § 5.105(a) and 24 CFR § 982.53, including but not limited to:

- the Fair Housing Act;
- Section 504 of the Rehabilitation Act of 1973;
- Title VI of the Civil Rights Act of 1964;
- the Age Discrimination Act;
- HUD's Equal Access Rule; and
- Title II of the Americans with Disabilities Act of 1990.

These requirements prohibit discrimination on the basis of race, color, religion, sex (including gender identity and sexual orientation), familial status, national origin, disability, age, and marital status. PHAs/MFH Owners must also comply with Title III of the Americans with Disabilities Act of 1990, as applicable (see 28 CFR part 36).

When an assisted household includes a person with disabilities, a reasonable accommodation may be necessary. A reasonable accommodation is a change, exception, or adjustment to rules, policies, practices, or services that may be necessary in order to enable an applicant or resident with a disability to have an equal opportunity to use and enjoy a dwelling, including public and common areas, or to participate in or access programs and activities. Under Section 504, reasonable accommodations may also include a structural change to a unit, or to a public or common use area. In addition, the PHAs/MFH Owners must provide effective communication to persons with disabilities, including those with vision, hearing, and other communication-related disabilities, which includes ensuring that information is provided in appropriate accessible formats as needed (e.g., Braille, audio, large type, assistive listening devices, sign language interpreters, accessible Web sites; and other accessible electronic communications). See 24 CFR § 8.6.

PHAs/MFH Owners must also take reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP). LEP guidance and LEP information is available here: https://www.federalregister.gov/documents/2007/01/22/07-217/final-guidance-tofederalfinancial-assistance-recipients-regarding-title-vi-prohibition-against.

In addition, PHAs/MFH Owners must comply with the Violence Against Women Act (VAWA), HUD's implementing VAWA regulation at 24 CFR part 5 – subpart L, and applicable program regulations.

Attachment E: Topic: Household Composition

Regulations

24 CFR §§ 5.403; 5.603; 5.609; 891.105; and 891.520

Applicable Programs

HUD Multifamily Housing	HUD Multifamily Housing	Public and Indian Housing
Section 8 (Project Based Rental Assistance), Section 202/8	Section 202/162 PAC, Section 202/811 PRAC, Section 236 IRP, Section 811 PRA	HCV (including Project-Based vouchers), Public Housing, Section 8 Moderate Rehabilitation, Section 8 Moderate Rehabilitation SRO
Yes	Yes[E1]	Yes

Summary

See subtopics.

Subtopics

E.1 Definition of Family

Regulation: 24 CFR § 5.403

Summary: The final rule revises the definition of family to also include a single person who:

- Is an otherwise eligible youth who has attained at least 18 years of age and not more than 24 years of age;
- Has left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act (42 U.S.C. 675(5)(H)); and
- Is homeless or is at risk of becoming homeless at age 16 or older.

The definition of “family” in the final rule incorporates revisions made to the 1937 Act by the Fostering Stable Housing Opportunities provisions of the Consolidated Appropriations Act, 2021, which expands the definition of “single persons.” Due to the modification of the statute prior to this final rule, HUD is making a conforming change to 24 CFR § 5.403 to align with the new statutory language.

PHA/MFH Owner Discretion: None.

E.2 New Definitions of Foster Adult and Foster Child

Regulation: 24 CFR § 5.603

Summary: The final rule establishes definitions for “foster adult” and “foster child.” A foster adult is defined as a member of the household who is 18 years or older and meets

[E1] SPRACs have a program-specific definition of Family found in paragraph 2.3 (Families to be Housed) of the SPRAC II (form HUD–93742a).

the definition of a foster adult under state law. State-level agencies define who is considered a foster adult/child, so the classification may vary from state to state.

In general, a foster adult is unable to live independently due to a debilitating physical or mental condition and is placed with the family by an authorized placement agency or by judgment, decree, or other order of any court of competent jurisdiction.

A foster child is defined as a member of the household who meets the definition of a foster child under state law. In general, a foster child is placed with the family by an authorized placement agency (e.g., public child welfare agency) or by judgment, decree, or other order of any court of competent jurisdiction.

Foster adults/children are not considered **family members** and must not be included in calculations of income for eligibility and rent determination purposes. However, foster adults/children are considered **household members** and must be included when determining unit size or subsidy standards based on established policies.

The definition of "dependent" under § 5.603 was revised to explicitly **exclude** foster children and foster adults. PHAs/MFH Owners may not provide a dependent deduction under § 5.611(a) for a foster child or foster adult. Consistent with the determination that foster adults/children are not family members, income earned by foster adults/children, payments received for the care of foster adults/children, and expenses incurred related to foster adults/children are not considered to be family income or family expenses used in the determination of annual income. Reasonable unreimbursed child-care expenses (as defined in § 5.603) for foster children under 13 years of age may be deducted from annual income if those expenses are necessary to enable a member of the family to work, look for work, or to further their education, but only if the unreimbursed child-care expense for the care of the foster child is paid from the family's annual income (and not another source, such as a stipend from a child welfare agency). PHAs may use their discretion to establish permissive deductions pursuant to 24 CFR 5.611(b) related to foster children and foster adults – for example, to allow unreimbursed health and medical expenses (defined in § 5.603) of an elderly or disabled family related to their foster child or foster adult to be deducted from annual income, so long as the expenses are paid from the elderly or disabled family's annual income (and not another source, such as a stipend from a child welfare agency). MFH Owners are not permitted to adopt permissive deductions (see section C.7 for information on permissive deductions).

Families may be eligible to continue to receive the child-care expense deduction, pursuant to a hardship exemption, when the unreimbursed child-care expense is for the care of a foster child under the age of 13, but only if the unreimbursed child-care expense for the care of the foster child is paid from the family's annual income (and not another source, such as a stipend from a child welfare agency). See Attachment C (paragraph C.5) (Child-Care Expenses Deduction and Hardship Exemption to Continue Child-Care Expenses Deduction) of this notice.

When a member of an assisted family is temporarily placed in foster care (as confirmed by the state child welfare agency), the member is still counted as a family member in the unit from which they were removed. This means that a foster child or foster adult could be considered an assisted family member in one household while also being a foster child or adult in another household and receiving consideration in both families' voucher size and/or unit size.

PHA/MFH Owner Discretion: None.

E.3 Alignment of Family Member Definition Across Programs

Regulations: 24 CFR §§ 5.403; 5.603; and 5.609

Summary: Since approximately 2008, MFH programs have treated foster children and foster adults as family members. Effective with the final rule, foster children and foster adults will be treated as household members in MFH programs. This policy alignment is not a direct result of HOTMA but serves rather to conform MFH programs with the existing treatment of foster children/adults across other HUD programs.

HUD reminds PHAs and MFH Owners that the income and net family assets of household members are excluded when determining initial eligibility or eligibility for continued assistance; however, household members are considered for purposes of unit size and subsidy standards. For example, a live-in aide must be considered for bedroom size requirements for a unit, but their income and expenses would not be included for the purposes of income eligibility and assistance levels. Household members do not qualify for expenses or deductions, except that reasonable unreimbursed child-care expenses may be deducted for foster children under the age of 13 if it enables a member of the family to work, look for work, or go to school, and only if the unreimbursed child-care expense for the care of the foster child is paid from the family's annual income (and not another source, such as a stipend from a child welfare agency).

PHA/MFH Owner Discretion: None.

ATTACHMENT F: TOPIC: INCOME

Regulations

24 CFR §§ 5.100; 5.603; 5.603(b); 5.603(b)(3) – (b)(4); 5.609; 5.609(a)(1) – (a)(2); 5.618; 882.515(a); 882.808(i)(1); 891.105; 891.655; 960.259(c)(2); and 982.516(a)(3)

Applicable Programs

HUD Multifamily Housing	HUD Multifamily Housing	Public and Indian Housing
Section 8 (Project Based Rental Assistance)	Section 202/162 PAC, Section 202/8, Section 202/811 PRAC, Section 236 IRP, Section 811 PRA, SPRAC	HCV (including Project-Based vouchers), Public Housing, Section 8 Moderate Rehabilitation, Section 8 Moderate Rehabilitation SRO
Yes	Yes	Yes

Summary

See subtopics.

Subtopics

F.1 Annual Income

Regulations: 24 CFR §§ 5.609(a)(1)–(a)(2); and 891.105

Summary: Annual income includes all amounts received from all sources by each member of the family who is 18 years of age or older, the head of household, or spouse of the head of household, in addition to unearned income received by or on behalf of each dependent who is under 18 years of age. Annual income does not include amounts specifically excluded in paragraph (b) of 24 CFR § 5.609. See Attachment G (Income Exclusions). All amounts received by the head of household, co-head, or spouse, including the income of a day laborer, independent contractor, and seasonal worker (see paragraphs F.2.a, F.2.b, and F.2.c, below) are included in annual income regardless of age, unless otherwise excluded in paragraph (b) of 24 CFR § 5.609.

Note: Annual income includes "all amounts received," not the amount that a family **may be** legally entitled to receive but **did not** . For example, a family's child-support or alimony income must be based on payments received, not the amounts the family is entitled to receive based on any court or agency order. A copy of a court order or other written payment agreement alone may not be sufficient verification of amounts received by a family. However, when a family member's wages or benefits are garnished, levied, or withheld[F1] to pay restitution, child support, tax debt, student loan debt, or other applicable debts, PHAs/MFH Owners must use the gross amount of the income, prior to the reduction, to determine a family's annual income.

[F1] See: https://www.dol.gov/general/topic/wages/garnishments and https://faq.ssa.gov/en-us/Topic/article/KA-01873.

Annual income also includes all actual anticipated income from assets even if the asset is excluded from net family assets but the income from the asset is not otherwise excluded. Imputed returns on net family assets are included in annual income only when net family assets exceed $50,000 (a figure that is annually adjusted for inflation) and actual asset income cannot be calculated for all assets (see F.6.b, below, for a discussion of scenarios where income can be calculated for some but not all assets). PHAs/MFH Owners will not impute income from assets if the total value of net family assets is equal to or less than $50,000 (as adjusted by inflation). See paragraph F.4.a (Determining Net Family Assets), below, for the definition of net family assets and paragraph F.6 (Actual and Imputed Income from Assets).

PHA/MFH Owner Discretion: None.

F.2 Earned Income

Regulation: 24 CFR § 5.100

Summary: Earned Income is defined as income or earnings from wages, tips, salaries, other employee compensation, and net income from self-employment. Earned income does not include any pension or annuity, transfer payments (meaning payments made or income received in which no goods or services are being paid for, such as welfare assistance, Social Security, and other governmental subsidies/benefits), or any cash or in-kind benefits.

PHA/MFH Owner Discretion: None.

F.2.a Definition of Day Laborer

Regulation: 24 CFR § 5.603(b)

Summary: A day laborer is defined as an individual hired and paid one day at a time without an agreement that the individual will be hired or work again in the future.

Income earned as a day laborer is not considered nonrecurring income under 24 CFR § 5.609(b)(24) (see Attachment G (paragraph G.1) (Nonrecurring Income) of this notice) and must be included, unless specifically excluded in 24 CFR § 5.609(b) (e.g., earnings of full-time students in excess of the dependent deduction (24 CFR §§ 5.609(b)(3), (b)(14), etc.).

PHA/MFH Owner Discretion: None.

F.2.b Definition of Independent Contractor

Regulation: 24 CFR § 5.603(b)

Summary: An independent contractor is an individual who qualifies as an independent contractor instead of an employee in accordance with the Internal Revenue Code federal income tax requirements and whose earnings are consequently subject to the self-employment tax.

In general, an individual is an independent contractor if they have the right to control or direct only the conduct of the work. For example, while instructions and route information are generally provided, third-party delivery and transportation service providers are considered independent contractors unless state law dictates otherwise. In addition, individuals considered "gig workers," such as babysitters, landscapers, rideshare drivers, and house cleaners, typically fall into the category of independent contractor.

Income earned as an independent contractor is not considered nonrecurring income (see Attachment G (paragraph G.1) (Nonrecurring Income)) and must be included unless specifically excluded in 24 CFR § 5.609(b) (e.g., 24 CFR §§ 5.609(b)(3), (b)(14), etc.).

PHA/MFH Owner Discretion: None.

F.2.c Definition of Seasonal Worker

Regulation: 24 CFR § 5.603(b)

Summary: A seasonal worker is defined as an individual who is: 1) hired into a short-term position (e.g., for which the customary employment period for the position is 6 months or fewer); and 2) the employment begins about the same time each year (such as summer or winter). Typically, the individual is hired to address seasonal demands that arise for the employer or industry.

Some examples of seasonal work include employment limited to holidays or agricultural seasons. Seasonal work may include but is not limited to employment as a lifeguard, ballpark vendor, or snowplow driver.

Income earned as a seasonal worker is not considered nonrecurring income (see Attachment G (paragraph G.1) (Nonrecurring Income)) and must be included unless specifically excluded in 24 CFR § 5.609(b) (e.g., § 5.609(b)(14), etc.).

PHA/MFH Owner Discretion: None.

F.3 Definition of Unearned Income

Regulation: 24 CFR § 5.100

Summary: Unearned income means any annual income, as calculated under 24 CFR § 5.609, that is not earned income.

PHA/MFH Owner Discretion: None.

F.4 Assets

Asset requirements in 24 CFR §§ 5.603 and 5.609 apply to HCV (including Project-Based Vouchers and all special purpose vouchers), Public Housing, Section 8 Moderate Rehabilitation, Section 8 Moderate Rehabilitation SRO, and MFH programs.

F.4.a Determining Net Family Assets

Regulations: 24 CFR §§ 5.100 and 5.603

Summary: Net family assets are defined as the net cash value of **all assets owned by the family**, after deducting reasonable costs that would be incurred in disposing of real property, savings, stocks, bonds, and other forms of investment, except as excluded (see Attachment F (paragraph F.4.b) (Exclusions from Net Family Assets) of this notice).

Assets with negative equity. The cash value of real property[F2] or other assets with negative equity would be considered $0 for the purposes of calculating net family assets. Negative equity in real property or other investments does not prohibit the family from selling the property or other investments, so negative equity alone would not justify excluding the property or other investments from family assets.

Assets disposed of for less than fair market value. In determining the value of net family assets, PHAs/MFH Owners must include the value of any business or family assets disposed of by an applicant or tenant for less than fair market value (including a disposition in trust,[F3] but not in a foreclosure or bankruptcy sale) during the two years preceding the date of application for the program or reexamination, as applicable, in excess of the consideration received.

For example, if a family gave away a home with a net value of $80,000, the value of the home must be included in the calculation of net family assets for two years following the transfer of property. If a family sold a home for less than fair market value, the difference between the value and the amount for which they sold it would be included in net family assets for two years following the transfer of property. For example, if a family sold a property with a fair market value of $80,000 to a friend for $20,000, then the difference in value ($60,000) minus the cost to dispose of the property ($10,000), which is in this example totals $50,000, would be counted in net family assets for two years from the date of the property's transfer to the other party.

An asset moved to a retirement account held by a member of the family is not considered to be an asset disposed of for less than fair market value. In the case of a disposition as part of a separation or divorce settlement, the disposition will not be considered less than fair market value if the applicant or tenant receives consideration not measurable in dollar terms.

Asset owned by business entity. If a business entity (e.g., limited liability company or limited partnership) owns the asset, then the family's asset is their ownership stake in the business, not some portion of the business's assets. However, if the family holds the assets in their own name (e.g., they own one-third of a restaurant) rather than in the name of a business entity, then the percentage value of the asset owned by the family is what is counted toward net family assets (e.g., one-third of the value of the restaurant).

Jointly owned assets. For assets jointly owned by the family and one or more individuals outside of the assisted family, PHAs/MFH Owners must include the total value of the asset in the calculation of net family assets, unless the asset is otherwise excluded (see F.4.b of this notice), or unless the assisted family can demonstrate that the asset is inaccessible to them, or that they cannot dispose of

[F2] Real property, as used in 24 CFR Part 5, has the same meaning as that provided under the state law in which the real property is located.

[F3] A disposition in trust is when the family creates a trust for the benefit of someone outside of the assisted family. It would not be considered an asset disposed of for less than fair market value if the family establishes a nonrevocable trust for the benefit of someone in the assisted family.

any portion of the asset without the consent of another owner who refuses to comply. If the family demonstrates that they can only access a portion of an asset, then only that portion's value shall be included in the calculation of net family assets for the family. Likewise, any income from a jointly owned asset must be included in annual income, unless that income is specifically excluded (see Attachment G), or unless the family demonstrates that they do not have access to the income from that asset, or that they only have access to a portion of the income from that asset.

If an individual is a beneficiary who is entitled to access the account's funds only upon the death of the account's owner, and may not otherwise withdraw funds from an account, then the account is not an asset to the assisted family, and the family should provide proper documentation demonstrating that they are only a beneficiary on the account.

PHA/MFH Owner Discretion: None.

F.4.b Exclusions from Net Family Assets

Regulations: 24 CFR § 5.603(b)(3)–(b)(4)

Required exclusions from net family assets include the following:

- The value of necessary items of personal property. (See paragraph F.4.c (Necessary and Non-Necessary Personal Property) of this notice.)
- The value of all non-necessary items of personal property with a total combined value of $50,000 or less, annually adjusted for inflation. (See paragraph F.4.c (Necessary and Non-Necessary Personal Property) of this notice.)
- The value of any account under a retirement plan recognized as such by the Internal Revenue Service, including Individual Retirement Accounts (IRAs), employer retirement plans (e.g., 401(k), 403(b)), and retirement plans for self-employed individuals.
- The value of real property that the family does not have the effective legal authority to sell in the jurisdiction in which the property is located. Examples of this include but are not limited to: co-ownership situations (including situations where one owner is a victim of domestic violence), where one party cannot unilaterally sell the real property; property that is tied up in litigation; inherited property in dispute.
- Any amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty owed to a family member arising out of law that resulted in a member of the family being a person with disabilities.
- The value of any Coverdell education savings account under section 530 of the Internal Revenue Code of 1986; the value of any qualified tuition program under section 529 of such Code; and the amounts in, contributions to, and

distributions from any Achieving a Better Life Experience (ABLE) account authorized under section 529A of such code.

- The value of any "baby bond" account created, authorized, or funded by the federal, state, or local government (money held in trust by the government for children until they are adults).
- Interests in Indian trust land.
- Equity in a manufactured home where the family receives assistance under 24 CFR Part 982.
- Equity in property under the Homeownership Option for which a family receives assistance under 24 CFR Part 982.
- Family Self-Sufficiency accounts.
- Federal tax refunds or refundable tax credits for a period of 12 months after receipt by the family.
- The full amount of assets held in an irrevocable trust. (See paragraph F.4.d (Trusts) of this notice.)
- The full amount of assets held in a revocable trust where a member of the family is the beneficiary, but the grantor/owner and trustee of the trust is not a member of the participant family or household. (See paragraph F.4.d (Trusts) of this notice)

PHA/MFH Owner Discretion: PHAs/MFH Owners may need to revise application forms, interview guides and individual verification forms to ensure that they are gathering adequate information to make appropriate asset exclusion determinations.

F.4.c Necessary and Non-Necessary Personal Property

Regulation: 24 CFR § 5.603

Summary: Necessary personal property is excluded from net family assets. Non-necessary personal property with a combined value greater than $50,000, as adjusted by inflation, is considered part of net family assets. When the combined value of all non-necessary personal property does not exceed $50,000, as adjusted by inflation, all non-necessary personal property is excluded from net family assets.

All assets are categorized as either real property (e.g., land, a home) or personal property. Personal property includes tangible items, like boats, as well as intangible items, like bank accounts. For example, a family could have non-necessary personal property with a combined value that does not exceed $50,000 but also own real property such as a parcel of land. Even though the non-necessary personal property would be excluded from net family assets, the real property would be included in net family assets regardless of its value unless the real property meets a different exclusion under 24 CFR § 5.603.

Necessary personal property are items essential to the family for the maintenance, use, and occupancy of the premises as a home; or they are necessary for employment, education, or health and wellness. Necessary personal property includes more than merely items that are indispensable to the bare existence of the family. It may include personal effects (such as items that are ordinarily worn or utilized by the individual), items that are convenient or useful to a reasonable existence, and items that support and facilitate daily life within the family's home. Necessary personal property also includes items that assist a household member with a disability, including any items related to disability-related needs, or that may be required for a reasonable accommodation for a person with a disability. Necessary personal property does not include bank accounts, other financial investments, or luxury items.

Determining what is a necessary item of personal property is a highly fact-specific determination, and therefore it is incumbent on PHAs/MFH Owners to gather enough facts to qualify whether an asset is necessary or non-necessary personal property.

Items of personal property that do not qualify as necessary personal property will be classified as non-necessary personal property.

The following table lists examples of necessary and non-necessary personal property. **This is not an exhaustive list.**

Table F1: Examples of Necessary and Non-Necessary Personal Property

Necessary Personal Property	Non-Necessary Personal Property
• Car(s)/vehicle(s) that a family relies on for transportation for personal or business use (e.g., bike, motorcycle, skateboard, scooter) • Furniture, carpets, linens, kitchenware • Common appliances • Common electronics (e.g., radio, television, DVD player, gaming system) • Clothing • Personal effects that are not luxury items (e.g., toys, books) • Wedding and engagement rings • Jewelry used in religious/cultural celebrations and ceremonies • Religious and cultural items • Medical equipment and supplies • Health care–related supplies • Musical instruments used by the family	• Recreational car/vehicle not needed for day-to-day transportation (campers, motorhomes, travel trailers, all-terrain vehicles (ATVs)) • Bank accounts or other financial investments (e.g., checking account, savings account, stocks/bonds) • Recreational boat/watercraft • Expensive jewelry without religious or cultural value, or which does not hold family significance • Collectibles (e.g., coins/stamps) • Equipment/machinery that is not used to generate income for a business • Items such as gems/precious metals, antique cars, artwork, etc.

• Personal computers, phones, tablets, and related equipment • Professional tools of trade of the family, for example professional books • Educational materials and equipment used by the family, including equipment to accommodate persons with disabilities • Equipment used for exercising (e.g., treadmill, stationary bike, kayak, paddleboard, ski equipment)	

Example F1: Necessary and Non-Necessary Personal Property

The Cross family owns three items of personal property. The family has a checking account valued at $5,000, a $15,000 recreational boat, and Ms. Cross's $3,000 engagement ring.

The checking account and recreational boat are both considered non-necessary personal property. They are worth a combined $20,000. The engagement ring is considered necessary personal property, because it is jewelry used in a religious/cultural celebration or ceremony. Since the total value of non-necessary personal property is less than $50,000, the family's non-necessary personal property will not be considered when calculating the Cross family's net family assets.

Cross Family's Personal Property

Item	Estimated Value	Type	Amount to be considered as non-necessary personal property
Checking account	$5,000	Non-necessary Personal Property	$5,000
Ring (engagement ring)	$3,000	Necessary Personal Property	$0
Recreational boat	$15,000	Non-necessary Personal Property	$15,000
		Total Non-necessary Personal Property:	$20,000

Calculation of Cross Family's Total Net Assets

Asset	Total to be Considered in Net Family Assets
Non-necessary Personal Property	$0
Real Property	$0
Total:	$0

The Cross family's total net family assets are $0.

PHA/MFH Owner Discretion: None.

F.4.d Trusts

Regulations: 24 CFR §§ 5.603 and 5.609

Summary: Whether the value of a trust counts as a net family asset and whether distributions from the trust count as annual income to the family depends on the following three factors:

- Whether the trust is under the control of the family;
- Whether distributions are made from the trust's principal; and

- The purpose of the distribution, if the distribution is made from income earned on the trust's principal.

F.4.d.i Trusts as Net Family Assets

The value of irrevocable trusts and revocable trusts that are not under the control of the family are both excluded from net family assets.

The distinguishing feature of a revocable trust is that the grantor can terminate and/or amend the trust at any time for any reason before his or her death. In circumstances when a member of the assisted family is the beneficiary of a revocable trust, but the grantor is not a member of the assisted family, the beneficiary does not "own" the revocable trust, and the value of the trust is excluded from net family assets. For the revocable trust to be considered excluded from net family assets, no family or household member may be the account's trustee.

A revocable trust that is under the control of the family or household (e.g., the grantor is a member of the assisted family or household) **is** included in net family assets, and, therefore, income earned on the trust is included in the family's income from assets. This also means that PHAs/MFH Owners will calculate imputed income on the revocable trust if net family assets are more than $50,000, as adjusted by inflation, and actual income from the trust cannot be calculated (e.g., if the trust is comprised of farmland that is not in use).

F.4.d.ii Actual Income from a Trust

If the PHA/MFH Owner determines that the revocable trust is included in the calculation of net family assets, then the actual income earned by the revocable trust is also included in the family's income.

Where an irrevocable trust is excluded from net family assets, the PHA/MFH Owner must not consider actual income earned by the trust (e.g., interest earned, rental income if property is held in the trust) for so long as the income from the trust is not distributed.

F.4.d.iii Trust Distributions and Annual Income

- **Revocable trust considered part of net family assets:** If the value of the trust is considered part of the family's net assets, then distributions from the trust are not considered income to the family.
- **Revocable or irrevocable trust not considered part of net family assets:** If the value of the trust is not considered part of the family's net assets, then distributions from the trust are treated as follows:
    - All distributions from the trust's principal are excluded from income.
    - Distributions of income earned by the trust (i.e., interest, dividends, realized gains, or other earnings on the trust's

principal), are included as income unless the distribution is used to pay for the health and medical expenses for a minor.

Table F2 below is a tool to assist PHAs/MFH Owners in determining whether a trust should be considered a net family asset and/or whether a trust's earned interest or distributions are considered income to the family.

Table F2: Annual Income/Net Family Assets Scenarios based on Trust Type

Trust Type	**Is the trust considered a net family asset?**	**Is the actual interest earned by the trust considered family income?**	**Are distributions of trust principal considered family income?**	**Are distributions of interest earned on the trust principal considered family income?**
Revocable Grantor is not part of the assisted family or household (and the family or household is not otherwise in control of the trust)	No	No	No	Yes, unless the distributions are used to pay for the health and medical expenses for a minor
Revocable Grantor is part of the assisted family or household (or the trust is otherwise under the control of the family or household)	Yes	Yes	No	No
Irrevocable (Typically, Special Needs Trusts are irrevocable.)	No	No	No	Yes, unless the distributions are used to pay for the health and medical expenses for a minor

PHAs/MFH Owners must be careful to distinguish between distributions of principal and distributions of earnings on a trust's principal when verifying family income from irrevocable trusts and revocable trusts where the grantor is not part of the assisted family or household, so as not to unintentionally include distributions of principal that are not considered income.

Note: The policy implemented under HOTMA is a change from the previous policies of both PIH and MFH. Previously, PIH considered all distributions of principal or income earned on the principal as income unless the distribution qualified as an income exclusion. In determining whether a distribution from a trust should be counted as income to the beneficiary, MFH considered how the trust was funded, whether the distribution was from trust income or principal, and whether any distribution from trust income met an existing income exclusion. The policy under HOTMA aligns the policies of MFH and PIH and clarifies that the term "income" means "trust income" and not **any** distribution from the trust to the beneficiary.

PHA/MFH Owner Discretion: None.

F.4.e Federal Tax Refunds or Refundable Tax Credits

Regulation: 24 CFR § 5.603

Summary: All amounts received by a family in the form of federal tax refunds or refundable tax credits are excluded from a family's net family assets for a period of 12 months after receipt by the family.

Taxpayers have several options for receiving their tax refunds: via paper check or direct deposit into a checking or savings account; via TreasuryDirect to buy savings bonds; via direct deposit into a Traditional, Roth, or Simplified Employee Pension Plan-IRA; or via purchase of savings bonds, a Health Savings Account, an Archer Medical Savings Account, or a Coverdell Education Savings Account. Refundable tax credits, such as the Earned Income Tax Credit (EITC), are determined as part of an overall tax return submission to the Internal Revenue Service (IRS). Taxpayers receive one federal tax refund reflecting the taxpayer's tax liability, if negative, including any applicable refundable tax credits.

At the time of an annual or interim reexamination of income, if the federal tax refund was received during the 12 months preceding the effective date of the reexamination, then the amount of the refund that was received by the family is subtracted from the total value of net family assets. When the subtraction results in a negative number, then net family assets are considered $0.

Note: Only the amount that the family receives is excluded from net family assets. For example, if a family anticipates a $500 federal tax refund but only receives $250, then only $250 will be excluded from the net family assets because that is the amount that the family received.

PHAs/MFH Owners are not required to verify the amount of the family's federal tax refund or refundable tax credit(s) if the family's net assets are equal to or below $50,000 (adjusted annually for inflation), even in years when full verification of assets is required or if the PHA/MFH owner does not accept self-certification of assets. PHAs/MFH Owner must verify the amount of the family's federal tax refund or refundable tax credits if the family's net assets are greater than $50,000.

The anticipated income earned by the assets in which a family has deposited their federal tax refund or refundable tax credits must be included in the family's annual income unless the income is specifically excluded under 24 CFR § 5.609(b).

Example F2: Federal Tax Refund Excluded from Net Family Assets

The Rodriguez family received a $4,500 federal tax refund on 3/1/2024 and deposited the refund into their checking account. At their next annual reexamination with an effective date of 8/1/2024, the PHA/MFH Owner asks the family about any assets they own, the anticipated income from the assets, and if they received a federal tax refund or refundable tax credits in the past 12 months and where they deposited the refund/refundable tax credits or if they purchased savings bonds with the refund.

The Rodriguez family explain that they received a $4,500 refund and that they deposited the refund into their checking account, which has a balance of $10,000. The Rodriguez family reports that they have actual income of $100 from the checking account this year. The family owns no other assets. Therefore, the family's total calculation of net family assets is $10,000. In determining the total value of net family assets, the PHA/MFH Owner subtracts $4,500 from the total of $10,000 of net family assets, for a total countable asset of $5,500. The full value of actual income is included as income, because actual income is always included even on excluded assets.

F.4.f Net Family Assets Examples

In some cases, amounts that are excluded from net family assets may be included as annual income when disbursements are made to a family from an asset. In other cases, amounts are excluded from annual income as a lump-sum addition to net family assets, but those funds are then considered a net family asset if held in an account or other investment that is considered part of net family assets. These concepts are illustrated in the three examples below.

Example F3: Retirement Accounts

Background: The value of any account under a retirement plan recognized by the Internal Revenue Service, including IRAs, employer retirement plans, and retirement plans for self-employed individuals, is not considered in determining net family assets. Any income earned on the funds while stored in such a retirement account is not considered actual income from assets. However, any distribution of periodic payments from the retirement account is considered income at the time it is received by the family (§ 5.609(b)(26)).

Scenario

Prior quarter ending balance of 401(k) account: $157,500

Prior quarter yield: 5 percent ($7,500)

Distributions made to family: $12,000 in prior year, same amount is anticipated to be received this year.

Result: In this example, the family's income reexamination will not include the 401(k), because the value of the 401(k) and the earnings will be considered neither net family assets nor income to the family; however, the family's income reexamination will include the $12,000 in distributions (unearned income) which has been paid from the retirement account in increments of $1,000 monthly to the family.

Example F4: Civil Rights Settlements

Background: A civil rights settlement, regardless of how the settlement is paid (lump sum or several distributions), is excluded from annual income; however, the amounts would be considered part of net family assets, if held in a savings account, revocable trust, or in some other asset that is not excluded from the definition of net family assets.

Scenario

Jessica receives a civil rights settlement in the amount of $20,000, because she was not provided a reasonable accommodation. Jessica deposits the $20,000 into her savings account, which already contains $5,000, and earns 0.5 percent interest annually. Total civil rights settlement received: $20,000 (excluded from income under § 5.609(b)(25)) Value of savings account: $25,000 (which includes the $20,000 settlement) Actual income earned from savings account: $25,000 x 0.005 = $125 included in annual income
Result: In this example, the family's income reexamination will not include the amount received from the civil rights settlement, because the funds are not considered income under § 5.609(b)(25). However, the value of the savings account where the settlement was deposited will be used in the calculation of net family assets, and the actual income earned from interest accrual (as self-certified by the family) will be included in the family's annual income.

Example F5: Life Insurance

Background: The cash value of life insurance policies that are available to the participant before death are included in net family assets (e.g., the surrender value of a whole life policy or a universal life policy). Net family assets will not include the value of term life insurance, which has no cash value to the individual before death. **Scenario A:** The Johnson family has a whole life insurance policy with a face value of $100,000 and a surrender value of $30,000. Net family assets will include $30,000 for the life insurance policy. The Johnson's family policy also pays an annual dividend of $100. This will be included as actual income. **Scenario B:** The Dexter family has a term life insurance policy with a face value of $100,000 payable upon death. The total amount included in the family's net family assets for this insurance policy will be $0.

F.5 Passbook Rate

Regulation: 24 CFR § 5.609(a)(2)

Summary: HUD will annually publish a passbook rate based on the Federal Deposit Insurance Corporation (FDIC) National Deposit Rate for savings accounts, which is an average of national savings rates published on a monthly basis. PHAs/MFH Owners must use the HUD-published passbook rate when calculating imputed asset income for net family assets that exceed $50,000 (a figure that is annually adjusted for inflation). The HUD-published passbook rate will be posted to a dataset on the HUD User Web site, alongside annual inflationary adjustments (see Attachment H).

To determine the passbook rate for the next calendar year, HUD will average the most recent three months of FDIC updates to the National Deposit Rate for savings accounts, rounded to the nearest hundredth of 1 percent. In order to ensure updated passbook rates may be used for reexaminations with an effective date of January 1, HUD will calculate the update in July each year, using FDIC data from April, May, and June for publication on HUD User not later than September 1.

For 2024, the passbook rate will be 0.40 percent. Below is an explanation of how the passbook rate was calculated for 2024. For reexaminations that occur after January 1, 2024, but before the date on which the PHA/MFH Owner implements the new passbook rate, PHAs may continue to set their own passbook rates, and MFH Owners must continue to use the 0.06 percent passbook rate. PHAs may also choose to implement the 2024 HUD passbook rate before complying with HOTMA as they have the flexibility to set their own passbook rate.

Table F3: Calculation of Passbook Rate for 2024

FDIC Monthly Update, Date of Publication	National Deposit Rate, Savings Accounts
4/17/2023	0.39 percent
5/15/2023	0.40 percent
6/20/2023	0.42 percent
HUD Passbook Rate (average of 3 months of FDIC National Deposit Rates)	**0.40 percent**

PHA/MFH Owner Discretion: None. PHAs were previously permitted to set their own passbook rates within a HUD-published range; effective with the final rule, PHAs/MFH Owners will be required to use the HUD-published passbook rate. The final rule supersedes Notice H 2016–01 (Passbook Saving Rate Effective February 1, 2016).

F.6 Actual and Imputed Income from Assets

Regulation: 24 CFR § 5.609(a)(2)

Summary: Actual income and imputed income are treated as described below.

F.6.a Actual Income

Actual income from assets is always included in a family's annual income, regardless of the total value of net family assets or whether the asset itself is included or excluded from net family assets, unless that income is specifically excluded by 24 CFR § 5.609(b).

Income or returns from assets are generally considered to be interest, dividend payments, and other actual income earned on the asset, and not the increase in market value of the asset. The increase in market value is relevant to the cash value of the asset for the purpose of determining total net family assets and imputing income.

The following examples illustrate how to calculate actual income from assets.

Example F6: Actual Asset Income from an Asset Excluded from Net Family Assets

Background: Eugene Park owns a checking account with $3,500 that earns 0 percent interest. He also has a savings account with a balance of $10,000 for which he expects to earn $300 in annual interest. Mr. Park has no other assets. Because those assets are classified as non-necessary personal property, and their combined value of $13,500 does not exceed $50,000, the combined value of all non-necessary personal property is excluded from the calculation of net family assets (see paragraph F.4.c (Necessary and Non-Necessary Personal Property) of this notice). The total value of Eugene Park's net family assets is $0, and $300 is included in annual income.
Scenario Total value of assets: $3,500 + $10,000 = $13,500 Net family assets: $0.00 (total value of assets is less than $50,000, therefore the value is excluded from net family assets)

Result: Actual income from assets (must be included in the calculation of annual income for Eugene Park): $300 ($0 from checking account + $300 from savings account)

Example F7: Calculating Net Family Assets and Actual Asset Income when Net Family Assets Exceed $50,000 (As Adjusted)

Background: Sherry McNeil received a federal tax refund of $1,200 and deposited the refund into her checking account. At the time of her annual reexamination six months later, the account had a balance of $10,000 and earns 0-percent interest. Sherry also owns a stock portfolio with a verified value of $45,000. The stocks earned $405 in cash dividends last year, which Sherry expects to earn again in the coming year.
Scenario Total value of assets: $55,000 ($10,000 + $45,000) Net family assets: $53,800 ($55,000 – $1200) (tax refund received in the last 12 months is excluded from net family assets under § 5.603(b)(3)(xi).) Because the total value of Sherry's non-excluded assets exceeds $50,000, this value ($53,800) is included as net family assets and must be confirmed via third-party verification. Actual Income from Checking Account: $0 earned ($10,000 x 0 percent) Actual Income from Stock Portfolio: $405 earned in dividends last year on $45,000
Result: Total actual income from assets (must be included in the calculation of annual income for Sherry McNeil): $405 ($0 + $405)

F.6.b Imputed Income

Imputed income from assets is no longer determined based on the greater of actual or imputed income from the assets. Instead, imputed asset income must be calculated for specific assets when three conditions are met:

- The value of net family assets exceeds $50,000 (as adjusted for inflation);
- The specific asset is included in net family assets; and
- Actual asset income cannot be calculated for the specific asset.

Imputed asset income is calculated by multiplying the net cash value of the asset, after deducting reasonable costs that would be incurred in disposing of the asset, by the HUD-published passbook rate (see Table F3 above). If the actual income from assets can be computed for some assets but not all assets, then PHAs/MFH Owners must add up the actual income from the assets, where actual income can be calculated, then calculate the imputed income for the assets where actual income could not be calculated. After the PHA/MFH owner has calculated both the actual income and imputed income, the housing provider must combine both amounts to account for income on net family assets with a combined value of over $50,000.

When the family's net family assets do not exceed $50,000 (as adjusted for inflation), imputed income is not calculated. Imputed asset income is never calculated on assets that are excluded from net family assets. When actual income for an asset — which can equal $0 — can be calculated, imputed income is not calculated for that asset.

Example F8: Combining Actual and Imputed Asset Income

Background: The Jorgensen family owns a small piece of vacant land with a cash value of $25,000. The family also owns a savings account with a verified balance of $55,000, with an interest rate of 0 percent. The family's total net assets are $80,000. The PHA/MFH Owner can calculate the actual income of the savings account as $0, as seen below. The PHA/MFH Owner is unable to calculate the actual income earned for the property owned by the family, because the property neither generates any income for them nor could an income amount be computed as a matter of interest or dividend earnings. Therefore, imputed asset income for the real property must be calculated. The passbook savings rate in effect is 0.10 percent.

Scenario

Actual Income from savings account: $55,000 x 0 percent = $0 actual income of savings account

Imputed income from family's property: $25,000 x 0.001= $25 imputed income

Result: Total asset income (must be included in the calculation of annual income for the Jorgensen family): $25 ($0 + $25)

PHAs/MFH Owners should not conflate an asset with an actual return of $0 (as in the example above), with an asset for which an actual return cannot be computed, such as could be the case for some non-financial assets that are items of non-necessary personal property. If the asset is a financial asset and there is no income generated (for example, a bank account with a 0 percent interest rate or a stock that does not issue cash dividends), then the asset generates zero actual asset income, and imputed income is not calculated. When a stock issues dividends in some years but not others (e.g., due to market performance), the dividend is counted as the actual return when it is issued, and when no dividend is issued, the actual return is $0. When the stock never issues dividends, the actual return is consistently $0.

Example F9: Imputing Income when Actual Income Cannot Be Calculated

Background: The Conrad family owns a recreational boat with a Kelley Blue Book value of $15,000. They also own a checking account with $10,000 that earns 0 percent interest and a savings account with $30,000 that earns 3 percent interest, putting their net family assets value at $55,000. No actual returns on the boat can be computed, however actual income can be calculated for the savings account. The passbook savings rate in effect is 0.10 percent.

Scenario

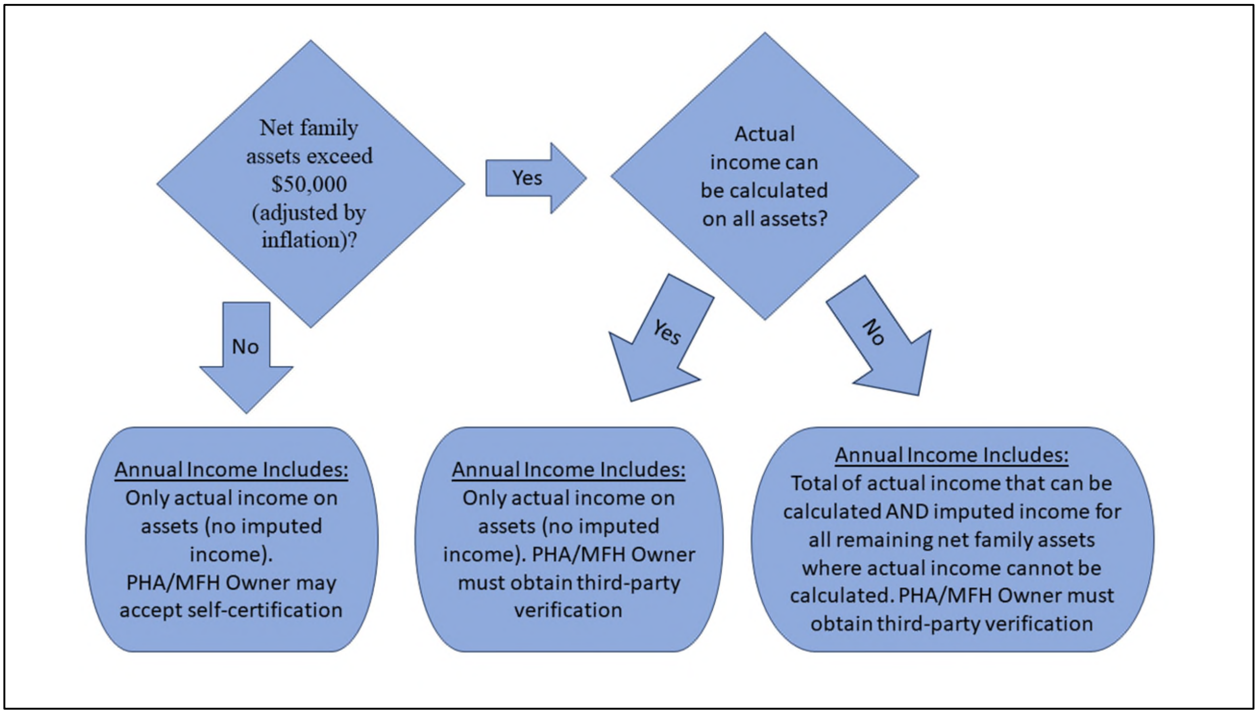
Actual income from assets: $900 (($10,000 x 0 percent) + ($30,000 x 0.03))

Imputed income from assets: $15 ($15,000 x 0.001)

Result: Total income from assets (must be included in the calculation of annual income for the Conrad family): $915 ($900 + $15)

The following chart illustrates different net family asset scenarios and whether to include actual and/or imputed assets in the family's annual income determination.

Chart F1: Decision Chart for Determining Income from Assets



PHA/MFH Owner Discretion: None.

F.7 Self-Certification of Net Family Assets Equal to or Less Than $50,000 (as adjusted for inflation)

Regulations: 24 CFR §§ 5.603; 5.609; 5.618; 5.659(e); 882.515(a); 882.808(i)(1); 891.105; 891.655; 960.259(c)(2); and 982.516(a)(3)

Summary: PHAs/MFH Owners may determine net family assets based on a self-certification by the family that the family's total assets are equal to or less than $50,000, adjusted annually for inflation, without taking additional steps to verify the accuracy of the declaration at admission and/or reexamination. PHAs/MFH Owners are not required to obtain third-party verification of assets if they accept the family's self-certification of net family assets. When PHAs/MFH Owners accept self-certification of net family assets at reexamination[F4], the PHA/MFH Owner must fully verify the family's assets every three years.

PHAs/MFH Owners may follow a pattern of relying on self-certification for two years in a row and fully verifying assets in the third year.

The family's self-certification must state the amount of income the family anticipates receiving from such assets. The actual income declared by the family must be included in the family's income, unless specifically excluded from income under 24 CFR § 5.609(b). PHAs/MFH Owners must clarify, during the self-certification process, which assets are included/excluded from net family assets.

[F4] See 24 CFR § 5.659(e); 960.259(c)(2); 982.516(a)(3).

PHAs/MFH Owners may combine the self-certification of net family assets and questions inquiring about a family's present ownership interest in any real property into one form.

Example F10: Self-Certification of Net Family Assets

We know from Example F1 that the Cross family's net family assets are $0. In this case, the checking account earns 0.07 percent interest annually.

<u>Cross Family's Personal Property</u>

Item	Estimated Value	Type	Amount to be Considered as Non-Necessary Personal Property
Checking account	$5,000	Non-necessary personal property	$5,000
Ring (engagement ring)	$3,000	Necessary personal property	$0
Recreational boat	$15,000	Non-necessary personal property	$15,000
		Total Non-necessary personal property	$20,000

<u>Calculation of Cross Family's Total Net Assets</u>

Asset	Total to be considered in Net Family Assets	Anticipated Income
Non-necessary Personal Property (Checking Account)	$0	$3.50
Real Property	N/A	N/A
Total:	**$0**	**$3.50**

The PHA/MFH Owner may accept a self-certification of assets from the Cross family if the PHA/MFH Owner has a policy to do so (see paragraph below this example for PHA/MFH Owner Discretion on accepting self-certification). The self-certification must include any anticipated income from assets. In this example, if the PHA/MFH Owner is accepting a self-certification of assets, then the calculations above would not need to be included on the self-certification form. Only the total anticipated income from assets must be included on the form.

Note that in this instance, even though the checking account is excluded from the calculation of net family assets (because the combined value of non-necessary personal property does not exceed $50,000), the family must report actual asset income from the checking account (in this case, $3.50).

PHA/MFH Owner Discretion: PHAs/MFH Owners are not required to adopt a policy to allow for self-certification of net family assets for families with net family assets that are equal to or below $50,000, adjusted annually for inflation. PHAs/MFH Owners who choose not to accept self-certifications of assets must verify all families' assets on an annual basis. Third-party verification of assets is required when net family assets exceed $50,000, adjusted annually by HUD.

Accepting a family's self-certification at admission may reduce the initial burden on applicants and speed up the lease-up process. In deciding whether to accept a self-certification of assets at admission, PHAs/MFH Owners are encouraged to consider the local needs and priorities in their communities along with the potential risks of accepting self-certification of net family assets, including the requirement to repay funds for participants/tenants who are later found to be ineligible for assistance.

PHAs/MFH Owners must include in their ACOPs, Administrative Plans, or Tenant Selection Plans, as applicable, whether and when they accept a self-certification of assets equal to or less than $50,000, which amount will be adjusted annually by HUD. See Attachment H (Inflationary Adjustments) of this notice for more information.

ATTACHMENT G: TOPIC: INCOME EXCLUSIONS

Regulations

24 CFR §§ 5.609(b)(4)–(5); 5.609(b)(7)–(10); 5.609(b)(14)–(15); 5.609(b)(17); 5.609(b)(19)–(24); 5.609(b)(24)(i)–(vii); 5.609(b)(25); 5.609(b)(27)–(28); 5.611; 891.105 and 891.655

Applicable Programs

HUD Multifamily Housing	HUD Multifamily Housing	Public and Indian Housing
Section 8 (Project Based Rental Assistance)	Section 202/162 PAC, Section 202/8, Section 202/811 PRAC, Section 236 IRP, Section 811 PRA, SPRAC	HCV (including Project-Based vouchers), Public Housing, Section 8 Moderate Rehabilitation, Section 8 Moderate Rehabilitation SRO
Yes	Yes	Yes

Summary

The section below provides descriptions and clarifying information for new and updated income exclusions referenced in 24 CFR § 5.609(b). Please note that this section does not address all income exclusions listed in 24 CFR § 5.609(b) but only those that are newly added or updated by the final rule.

PHAs/MFH Owners must revise their interview guides and individual verification forms to ensure that adequate information will be collected to make appropriate income exclusion determinations.

Subtopics

G.1 Nonrecurring Income

Regulation: 24 CFR §§ 5.609(b)(24) and CFR 891.105

Summary: The nonrecurring income exclusion replaces the former exclusion for temporary, nonrecurring, and sporadic income (including gifts), but it provides a narrower definition of excluded income in contrast to the former broad exclusion of temporary, nonrecurring, or sporadic income.

Income that will not be repeated beyond the coming year (i.e., the 12 months following the effective date of the certification), based on information provided by the family, is considered nonrecurring income and is excluded from annual income. However, income received as an independent contractor, day laborer, or seasonal worker is not excluded from income under § 5.609(b)(24), even if the source, date, or amount of the income varies.

Income that has a discrete end date and will not be repeated beyond the coming year during the family's upcoming annual reexamination period will be excluded from a family's annual income as nonrecurring income. This does not include unemployment income and other types of periodic payments that are received at regular intervals (such as weekly, monthly, or yearly) for a period of greater than one year that can be extended. For example, an increasing number of cities and states are piloting guaranteed income programs that have discrete beginning and end dates. This income can be excluded as nonrecurring in the final year of the pilot program. For example, for an annual reexamination effective 2/1/2024, guaranteed income that will be repeated in the coming year but will end before the next reexamination on 2/1/2025 will be fully excluded from annual income.

Income amounts excluded under this category may include, but are not limited to, nonrecurring payments made to the family or to a third party on behalf of the family to assist with utilities, eviction prevention, security deposits to secure housing, payments for participation in research studies depending on the duration, and general one-time payments received by or on behalf of the family.

The following list of exclusions is codified at 24 CFR § 5.609(b)(24) as nonrecurring income. Please note that the list is not exhaustive:

- Payments from the U.S. Census Bureau for employment lasting no longer than 180 days and not culminating in permanent employment;
- Direct federal or state economic stimulus payments;
- Amounts directly received by the family as a result of state refundable tax credits or state tax refunds at the time they are received;
- Amounts directly received by the family as a result of federal refundable tax credits or federal tax refunds at the time they are received;
- Gifts for holidays, birthdays, or other significant life events or milestones (e.g., wedding, baby shower, or anniversary gifts);
- In-kind donations (e.g., food, clothing, or toiletries received from a food bank or similar organization); and
- Lump-sum additions to net family assets (e.g., lottery winnings, contest winnings, etc.).

PHAs/MFH Owners may accept a self-certification from the family stating that the income will not be repeated in the coming year.

Example G1: Recurring and Nonrecurring Income

Scenario A: Non-recurring earned income excluded from annual income: Justin Clark worked for four months over the past year for a company that has since gone out of business. During the Clark family's reexamination interview, the PHA/MFH Owner asks Justin whether he expects to work for the company again in the coming year. Justin provides proof that the company went out of business. The PHA/MFH Owner must exclude Justin's earned income received from the company that went out of business from the family's annual income.

Scenario B: Recurring earned income included in annual income: Ana Johnson works as an independent information technology (IT) contractor during various times of the year, when her clients require additional IT contract support. Ana reasonably believes that she will be contracted again the following year based on discussions with her clients. The PHA/MFH Owner must include the income that Ana earns as an IT contractor in the family's annual income.

Scenario C: Guaranteed Basic Income (GBI) excluded from annual income: Lucretia Jones reports at her upcoming annual reexamination effective on 5/1/24 that her GBI program will be ending on 1/31/25. The

PHA/MFH Owner excludes this income because the programs will stop before the next annual reexamination on 5/1/25. This income must be excluded, because there is a set term for the program, and the payments will not be repeated beyond the coming year, which is the final year of a GBI program.

Scenario D: Research stipend included as annual income: Lillian Gonzalez reports at the annual reexamination that will be effective on 5/1/24 that she receives monthly payments for participation in a research project that is expected to last for 18 months and will end on 9/30/25. The PHA/MFH Owner includes this as income because the amounts will be received through the next annual reexamination on 5/1/25. For the 5/1/25 annual reexamination, the family provides a letter stating that the income will end on 9/30/25, so the PHA/MFH Owner will exclude the income received after the 5/1/25 annual reexamination.

PHA/MFH Owner Discretion: None.

G.1.a Nonrecurring Income: Temporary U.S. Census Bureau Employment

Regulation: 24 CFR § 5.609(b)(24)(i)

Summary: Payments from the U.S. Census Bureau for employment relating to the decennial census or the American Community Survey lasting no longer than 180 days and not culminating in permanent employment are excluded from annual income. However, it should be noted that any permanent employment with the U.S. Census Bureau should be considered in the annual income calculation.

PHA/MFH Owner Discretion: None.

G.1.b Nonrecurring Income: Economic Stimulus or Recovery Payments

Regulation: 24 CFR § 5.609(b)(24)(ii)

Summary: Direct federal or state payments intended for economic stimulus or recovery are excluded from annual income.

HUD will continue to advise PHAs/MFH Owners of which payments are considered economic stimulus or recovery payments for the purposes of income calculation.

PHA/MFH Owner Discretion: None.

G.1.c Nonrecurring Income: State Tax Refunds

Regulation: 24 CFR § 5.609(b)(24)(iii)

Summary: Amounts directly received by the family as a result of state refundable tax credits or state tax refunds at the time they are received are excluded from annual income.

PHA/MFH Owner Discretion: None.

G.1.d Nonrecurring Income: Federal Tax Refunds

Regulation: 24 CFR § 5.609(b)(24)(iv)

Summary: Amounts directly received by the family as a result of federal refundable tax credits and federal tax refunds at the time they are received are excluded from annual income.

PHA/MFH Owner Discretion: None.

G.1.e Nonrecurring Income: Gifts

Regulation: 24 CFR § 5.609(b)(24)(v)

Summary: Gifts for holidays, birthdays, or other significant life events or milestones (e.g., weddings, baby showers, anniversaries) are excluded from annual income.

Example G2: Gifts for Holidays, Birthdays, or Other Significant Life Events or Milestones

Mariah Smith received a check for \$250 on her 25th birthday from her favorite aunt and \$30 from her cousin. These gifts are excluded from annual income.

PHA/MFH Owner Discretion: None.

G.1.f Nonrecurring Income: In-Kind Donations

Regulation: 24 CFR § 5.609(b)(24)(vi)

Summary: Non-monetary in-kind donations, such as food or toiletries, received from a food bank or similar organization are excluded from annual income. When calculating annual income, PHAs/MFH Owners are prohibited from assigning monetary value to non-monetary in-kind donations received by the family from a food bank or similar organization.

Non-recurring, non-monetary in-kind donations from friends and family may be excluded as non-recurring income. See (24 CFR § 5.609(b)(24)).

Example G3: In-Kind Donations

Jonas Crandall receives a basket weekly from the local food bank that includes both food and toiletries. Because this is an in-kind donation from the local food bank, the PHA/MFH Owner must not include the basket items in the calculation of annual income.

PHA/MFH Owner Discretion: None.

G.2 Lump-Sum Additions to Net Family Assets

Regulation: 24 CFR § 5.609(b)(24)(vii)

Summary: Lump-sum additions to net family assets, including but not limited to lottery or other contest winnings, are excluded from annual income. These amounts may count toward net family assets in accordance with 24 CFR § 5.603.

Example G4: Lump-Sum Additions to Net Family Assets

Scenario A: Trevor Lucky bought 10 lottery tickets and discovered that one of the tickets won Trevor \$1,000. Trevor reported his winnings as part of an interim reexamination. The PHA/MFH Owner determined that the lottery winnings are a one-time, lump-sum addition to net family assets and should not be included in the annual income calculation. **Scenario B:** Logan fundraises \$5,000 online to help pay for personal expenses (e.g., "Go Fund Me"). The PHA/MFH Owner verified with Logan that this was a one-time solicitation for donations of cash and that Logan

does not intend for this to be a recurring source of income. The $5,000 is a one-time, lump-sum addition to net family assets and should not be included in the annual income calculation.

Scenario C: At the next annual reexamination, the PHA/MFH Owner determines that Logan solicited for donations online a second time and raised an additional $4,500. Again, Logan certified that he does not intend for this to be a recurring source of income, but, because the PHA/MFH Owner can establish a pattern, the $4,500 is **not** considered a lump-sum addition to net family assets and **should** be included in the annual income calculation.

PHA/MFH Owner Discretion: None.

G.3 Income Earned on Amounts Placed in a Family's Family Self Sufficiency (FSS) Account

Regulation: 24 CFR § 5.609(b)(27)

Summary: Income earned on amounts placed in a family's FSS account is excluded from the family's calculation of annual income.

PHA/MFH Owner Discretion: None.

G.4 Income of Live-in Aides, Foster Children, and Foster Adults

Regulation: 24 CFR § 5.609(b)(8)

Summary: Income of a live-in aide, foster child, or foster adult as defined in 24 CFR §§ 5.403 and 5.603 is excluded from the family's calculation of annual income.

PHA/MFH Owner Discretion: None.

G.5 Payments Received for the Care of Foster Children or Foster Adults or State or Tribal Kinship or Guardianship Care Payments

Regulation: 24 CFR § 5.609(b)(4)

Summary: Payments received for the care of foster children or foster adults, or state or Tribal kinship or guardianship care payments, are excluded from annual income.

This income exclusion also applies to Kinship Guardian Assistance Payments (Kin-GAP), kinship care payments, and other state-based kinship or guardianship payments that are alternatives to traditional foster care programs.

PHA/MFH Owner Discretion: None.

G.6 Insurance Payments or Settlements

Regulation: 24 CFR § 5.609(b)(5)

Summary: Insurance payments and settlements for personal or property losses, including but not limited to payments under health insurance, motor vehicle insurance, and workers' compensation, are excluded from annual income. Any workers' compensation is always excluded from annual income, regardless of the frequency or length of the payments.

Example G5: Insurance Payments or Settlements

Bethanne Williams received a settlement from her insurance company in the amount of $2,500 because of a car accident. Bethanne's car accident settlement payment is excluded from annual income.

Example G6: Workers' Compensation Received In Lieu of Wages

Tobias Reynolds was injured in a work accident. He is receiving bi-weekly workers' compensation payments. These amounts are excluded from annual income.

PHA/MFH Owner Discretion: None.

G.7 Civil Action Recoveries or Settlements

Regulation: 24 CFR § 5.609(b)(7)

Summary: Any amounts recovered in any civil action or settlement based on a claim of malpractice, negligence, or other breach of duty owed to a family member arising out of law that resulted in a member of the family becoming a person with disabilities are excluded from annual income. Any amounts recovered are excluded irrespective of whether they are received periodically or in a lump sum payment.

Example G7: Civil Action Recoveries or Settlements

Jacob Mitchell became a person with disabilities due to a construction site accident. He received $60,000 from a civil negligence case. The $60,000 received by Jacob is excluded from annual income.

PHA/MFH Owner Discretion: None.

G.8 Earned Income of Dependent Full-Time students

Regulation: 24 CFR § 5.609(b)(14)

Summary: Earned income of dependent full-time students in excess of the amount of the deduction for a dependent in § 5.611 is excluded from annual income. Full-time students must be dependent family members for this exclusion to apply. This exclusion does not apply to the head of household, spouse, or co-head. This means that the first $480 of the income earned by dependent full-time students will be included in the family's calculation of annual income.

The dependent deduction will be adjusted annually in accordance with the (CPI–W). See Attachment H. Full-time dependent students are eligible to receive both the $480 (as adjusted for inflation) dependent deduction and the exclusion described in this paragraph.

PHA/MFH Owner Discretion: None.

G.9 Adoption Assistance Payments

Regulation: 24 CFR § 5.609(b)(15)

Summary: Adoption assistance payments in excess of $480 per adopted child are excluded from the family's calculation of annual income. This amount will be adjusted annually in accordance with the CPI–W. See Attachment H.

All dependents, including adopted family members, are eligible to receive the $480 (as adjusted for inflation) dependent deduction and the exclusion described in this paragraph.

PHA/MFH Owner Discretion: None.

G.10 Veterans Regular Aid and Attendance

Regulation: 24 CFR § 5.609(b)(17)

Summary: Payments to veterans in need of regular aid and attendance are excluded from annual income under 38 U.S.C. 1521. This income exclusion applies only to veterans in need of regular aid and attendance and not to other beneficiaries of the payments, such as a surviving spouse.

Certain veterans are eligible for "aid and attendance" payments from the Veterans Affairs (VA) Administration. These payments are distinct from payments made to veterans under other VA programs, including the Veterans Pension program. PHAs/MFH Owners should carefully review any income documentation provided by the family, because many types of VA income, including the Veterans Pension and the VA Survivors Pension, are included in annual income.

PHA/MFH Owner Discretion: None.

G.11 Home-Based Care Payments for a Family Member(s) with a Disability(ies)

Regulation: 24 CFR § 5.609(b)(19)

Summary: Payments made by or authorized by a state Medicaid agency (including through a managed-care entity) or other state or federal agency to a family to enable a family member who has a disability to reside in the family's assisted unit are excluded from the calculation of the family's annual income. Authorized payments may include payments to a member of the assisted family through the state Medicaid agency (including through a managed-care entity) or other state or federal agency for caregiving services the family member provides to enable a family member who has a disability to reside in the family's assisted unit.

A family member with a disability qualifies for this income exclusion. Amounts received may be intended for items such as services, equipment, and compensation provided to a family member. The payments are excluded from income as long as the amounts are provided to enable a family member with a disability to remain in the family's assisted unit. Both the person providing the care and the person who has the disability must be family members (not household members) and must live in the same assisted household. The exclusion does not apply to income earned by the family for other caregiving services provided to individuals outside of the assisted household.

PHA/MFH Owner Discretion: None.

G.12 Loan Proceeds

Regulation: 24 CFR § 5.609(b)(20)

Summary: Loan proceeds (the net amount disbursed by a lender to a borrower under the terms of a loan agreement) received by the family or a third party (e.g., proceeds received by the family to finance the purchase of a car) are excluded from annual income. The loan borrower or co-borrower must be a member of the family for this income exclusion to be applicable.

Loan proceeds may include, but are not limited to, personal loans (with a loan agreement) and student loans, regardless of whether the proceeds are received in the form of a refund to the student.

PHA/MFH Owner Discretion: None.

G.13 Certain Payments Received by Tribal Members

Regulation: 24 CFR § 5.609(b)(21)

Summary: Payments received by Tribal members as a result of claims relating to the mismanagement of assets held in trust by the United States, to the extent such payments are also excluded from gross income under the Internal Revenue Code (IRC) or other federal law, are excluded from annual income.

Generally, payments received by tribal members in excess of the first $2,000 of per-capita shares are included in a family's annual income for purposes of determining eligibility. However, as explained below, payments made under the Cobell Settlement, and certain per-capita payments under the recent Tribal Trust Settlements, must be excluded from annual income in HUD programs that adopt the definitions of annual income in 24 CFR 5.609, the Census Long Form, and the IRS Form 1040, including the programs affected by this notice.[G1]

The following two subsections describe the circumstances when settlement payments paid to Tribal members are excluded from annual income through federal law or as required under the IRC.

G.13.a Cobell Settlement

In *Elouise Cobell et al. v. Ken Salazar et al.*,[G2] a class of individual members of Indian tribes filed suit against the United States for its failure to adequately manage certain trust assets. The settlement was authorized pursuant to the Claims Resolution Act of 2010 (Pub. L. 111–291). In accordance with the Act, lump-sum or periodic payments received by an individual Indian under the Cobell Settlement are statutorily excluded from counting toward a family's annual income, or as a resource, for purposes of determining initial eligibility or level of HUD assistance, for a period of one year from the time of receipt of that payment. This exclusion from income applies to all HUD programs and is included in the

[G1] A payment received by a tribal member from the tribe for distribution of Indian gaming profits is not a per-capita payment within the meaning of the Per Capita Distribution Act and does not qualify for income exclusion. If a family member who is a tribal member receives the Internal Revenue Service (IRS) Form 1099–MISC, Miscellaneous Income, from the tribe for reporting Indian gaming profits, then this payment must be counted toward the family's annual income.

[G2] https://naturalresources.house.gov/uploadedfiles/cobellsettlementagreement_120709.pdf.

list of federally mandated exclusions from annual income that HUD periodically publishes in the *Federal Register*.[G3]

G.13.b Tribal Trust Settlements

The United States has entered into settlements with a number of federally recognized Indian tribes, settling litigation in which the tribes alleged that the Department of the Interior and the Department of the Treasury mismanaged monetary assets and natural resources the United States holds in trust for the benefit of the tribes. In some circumstances, proceeds from these settlements have resulted in, or will result in, per-capita payments to Indian families by Indian tribes. To date, at least 70 Indian tribes have settled Tribal Trust cases.

24 CFR 5.609(b)(21) requires that certain payments received by Tribal members, to the extent that such payments are excluded from gross income under the IRC, must be excluded from family income. The Internal Revenue Service (IRS) issued guidance in IRS Notice 2013–1, “Per Capita Payments from Proceeds of Settlements of Indian Tribal Trust Cases,” advising that per-capita payments made from the proceeds of the enumerated Tribal Trust Settlements are excluded from the gross income of the members of the tribe receiving the per-capita payments under 25 USC 117b(a) and 25 USC 1407.

IRS Notice 2013–1 also clarifies, however, that per-capita payments that exceed the amount of the Tribal Trust Settlement proceeds and that are made from an Indian tribe’s private bank account in which the tribe has deposited the settlement proceeds are included in the gross income of the members of the tribe receiving the per-capita payments. For example, if an Indian tribe receives proceeds under a settlement agreement, invests the proceeds in a private bank account that earns interest, and subsequently distributes the entire amount of the bank account as per-capita payments, then a member of the tribe excludes from gross income that portion of the member’s per-capita payment attributable to the settlement proceeds under 25 USC 117b(a) and 25 USC 1407 and must include the remaining portion of the per-capita payment in gross income in accordance with the guidance provided in IRS Notice 2013-1. Per-capita payments not excluded from gross income in accordance with the IRC should be reviewed for potential exclusion as “nonrecurring income” (24 CFR § 5.609(b)(24)) or as “lump sum additions to net family assets” (24 CFR § 5.609(b)(24)(vii)).

The IRS last updated the list of Indian tribes who have entered into Tribal Trust Settlements with the United States in 2013,[G4] and for whom per-capita Tribal Trust payments are excluded from gross income. PHAs/MFH Owners should ensure they are reviewing the current list of Tribal Trust Settlements when determining whether a family’s per-capita proceeds should be excluded from annual income.

[G3] Last published on 5/20/2014: https://www.federalregister.gov/documents/2014/05/20/2014-11688/federally-mandated-exclusions-from-income-updated-listing.

[G4] See IRS Notice 2013-55, available at: http://www.irs.gov/pub/irs-drop/n-13-55.pdf.

Example G8: Tribal Trust Settlements

Scenario A: An Indian tribe received $1.2 million from a Tribal Trust Settlement. The Indian tribe immediately distributed per-capita payments to its members. The Tribal Trust Settlement is treated in accordance with the guidance in IRS Notice 2013–1 and excluded from adjusted gross income under 25 USC 117b(a) and 25 USC 1407. Therefore, the per-capita payments to members are excluded from annual income. **Scenario B:** An Indian tribe received $10 million from a Tribal Trust Settlement. The Indian tribe invested the settlement funds at a private institution. After a year, the Indian tribe distributed the settlement funds plus earned interest to its members. IRS Notice 2013–1 provides guidance that per capita payments that exceed the amount of the Tribal Trust case settlement proceeds and that are made from an Indian tribe's private bank account in which the tribe has deposited the settlement proceeds are not excluded from adjusted income under 25 USC 117b(a) and 25 USC 1407, so the interest payments to members are not excludable from annual income under 24 CFR 5.609(b)(21). The PHA/MFH Owner must determine whether the per-capita interest payments to members should be included in the family's income or excluded from income under a different regulatory provision such as 24 CFR 5.609(b)(24). Please note that the first $2,000 of per capita payments are also excluded from assets, except when these per capita payments are in excess of the settlement amount and are included (IRS Notice 2013-1, 25 USC 117b(a), and 25 USC 1407).

PHA/MFH Owner Discretion: None.

G.14 Exclusions from Other Federal Statutes

Regulation: 24 CFR § 5.609(b)(22)

Summary: This exclusion applies to all amounts that HUD is required by federal statute to exclude from annual income. HUD will publish a notice in the *Federal Register* to identify the benefits that qualify for this exclusion. Updates will be published when necessary.

PHA/MFH Owner Discretion: None.

G.15 Replacement Housing Gap Payments

Regulation: 24 CFR § 5.609(b)(23)

Summary: Replacement housing "gap" payments made in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 ("URA"), as implemented by 49 CFR Part 24, are excluded from annual income. "Gap" payments offset the increased out-pocket costs of displaced persons who move from one federally subsidized housing unit to another federally subsidized housing unit.

However, replacement housing "gap" payments are not excluded from annual income if the increased cost of rent and utilities is reduced or eliminated, and the displaced person retains or continues to receive the replacement housing "gap" payments.

Replacement housing "gap" payments should cover a minimum of 42 months of tenancy at the new unit.

Example G9: Replacement Housing Gap Payments

The Patel family was displaced from their Project-Based Voucher unit as the result of a HUD-funded acquisition and rehabilitation of the property that will last longer than one year. The family subsequently obtained a Housing Choice Voucher (HCV) and moved into a home where the owner accepts HCVs. The Patels' rent and utility expenses are $100 higher in their new unit. The Patels receive replacement housing "gap" payments of $100 intended to cover the difference between the Patels' former rent and utility expenses in their Project-Based Voucher unit and their current rent and expenses under their HCV assistance. The "gap" payments must be excluded from the family's annual income for the period during which gap payments are provided under the URA (42 months) or the increased cost of rent and utilities is reduced or eliminated, whichever is shorter.

PHA/MFH Owner Discretion: None.

G.16 Student Financial Assistance

Regulation: 24 CFR § 5.609(b)(9)

Summary: The treatment of student financial assistance depends on the HUD program, student/household characteristics, and the type of financial assistance received by the student. The student financial assistance rules apply to both full-time and part-time students.

The two types of student financial assistance applicable to MFH and PIH programs are described below.

G.16.a Amounts Received Under Section 479B of the Higher Education Act (HEA) of 1965, as amended (20 U.S.C. 1087uu)

Section 479B provides that certain types of student financial assistance are to be excluded in determining eligibility for benefits made available through federal, state, or local programs financed with federal funds. The types of financial assistance listed below are considered 479B student financial assistance programs; however, this list is not exhaustive, and 479B will be updated as of July 1, 2024.

- Federal Pell Grants;
- Teach Grants;
- Federal Work Study Programs;
- Federal Perkins Loans;
- Student financial assistance received under the Bureau of Indian Education;
- Higher Education Tribal Grant;
- Tribally Controlled Colleges or Universities Grant Program;
- Employment training program under section 134 of the Workforce Innovation and Opportunity Act (WIOA).

G.16.b Other Student Financial Assistance

Other student financial assistance includes grants or scholarships received from the following sources:

- The Federal government;
- A state (including U.S. territories), Tribe, or local government;
- A private foundation registered as a nonprofit under 26 U.S.C. 501(c)(3);
- A business entity (such as a corporation, general partnership, limited liability company, limited partnership, joint venture, business trust, public benefit corporation, or nonprofit entity); or
- An institution of higher education.

Other student financial assistance does not include:

- Financial support provided to the student in the form of a fee for services performed (e.g., a work study or teaching fellowship that is not excluded under section 479B of the Higher Education Act HEA); or
- Gifts, including gifts from family or friends.

Note: Other student financial assistance may be paid directly to the student or to the educational institution on the student's behalf. The PHA/MFH Owner must verify that the other student financial assistance is for the student's actual covered costs.

The following sections describe the treatment of the two above-described types of student financial assistance by program type.

G.16.c Non–Section 8 Programs Subject to this Notice

All assistance received under 479B of the HEA by students participating in the Public Housing or non–Section 8 programs administered by MFH is excluded from income. Other student financial assistance received by the student that, either by itself or in combination with HEA assistance, exceeds the actual covered costs is not excluded from income. Prior to the final rule, the full amount of student financial assistance paid directly to the student or to the educational institution was excluded.

Actual covered costs include: tuition, books, supplies (including supplies and equipment to support students with learning disabilities or other disabilities), room and board, and fees required and charged to a student by an institution of higher education (as defined under section 102 of the Higher Education Act of 1965 (20 U.S.C. 1087uu)). For a student who is not the head of household, co-head, or spouse, actual covered costs also include the reasonable and actual costs of housing while attending the institution of higher education and not residing in an assisted unit.

The formula for calculating the amount of other student financial assistance that is excluded from income always begins with deducting the assistance received under 479B of the HEA from the total actual covered costs, because the 479B assistance is intended to pay the student's actual covered costs. This formula is illustrated in chart 2, below.

Chart G1: Steps in Calculating Amount of Other Student Financial Assistance

Step 1: Subtract the **amount received under section 479B of the HEA** from the **actual covered costs** to arrive at the **amount of actual covered costs exceeding section 479B assistance**. If the amount of assistance received under section 479B of the HEA exceeds the actual covered costs and the student did not receive any other student financial assistance, then step 2 is not necessary; none of the student financial assistance will be included in income, because the assistance received under section 479B of the HEA is excluded from income for students participating in the Public Housing and non–Section 8 programs administered by MFH. **Step 2:** Subtract the **actual covered costs exceeding section 479B assistance** from the amount of **other student financial assistance** to arrive at the amount of **student financial assistance included in income**. Step 2 requires the amount of other student financial assistance received by the student to be subtracted from the amount of actual covered costs paid by other means. If the resulting number in Step 2 is a positive amount, then that is the amount that should be included in the family's income. If the resulting number in Step 2 is zero or a negative amount, then there will be no student financial assistance included in income (i.e., all student financial assistance is excluded from annual income).

The following examples illustrate the treatment of student financial assistance for Public Housing and non–Section 8 programs:

Example G10: Treatment of Student Financial Assistance in Non–Section 8 Programs

Juan is a full-time student, and he received the following grants and scholarships to cover his first year of college: Federal Pell Grant: $25,000; University Scholarship: $15,000; Rotary Club Scholarship: $3,000.	
Total assistance received under 479B of HEA: $25,000 (Federal Pell Grant) Total other student financial assistance received: $18,000	Juan's actual covered costs: $28,000
Step 1: Determine amount of actual covered costs exceeding section 479B assistance. $28,000 (actual covered costs) **minus** $25,000 (total assistance received under 479B of HEA) **equals** $3,000	Step 2: Determine amount of student financial assistance to include in income. $18,000 (other student financial assistance received) **minus** $3,000 (actual covered costs exceeding section 479B assistance) **equals** $15,000 (if negative, then use $0)
Amount of student financial assistance included in Juan's income: $15,000	

Example G11: Treatment of Student Financial Assistance in Non–Section 8 Programs

Sarah is a part-time student, and she received the following amounts to cover her first year of college: Federal Perkins Loan: $2,000; Scholarship from Local Car Dealership: $500; Gift from Aunt Lois: $1,000. The $1,000 is a gift from Aunt Lois, so it is not considered student financial assistance, and it is not considered in this calculation. Note: If Aunt Lois gives Sarah the $1,000 gift as a one-time, lump-sum payment, it would be excluded from income under 24 CFR § 5.609(b)(24)(vii).	
Total assistance received under 479B of HEA: $2,000 (Federal Perkins Loan) Total other student financial assistance received: $500 Total non-student financial assistance: $1,000 Total student financial assistance: $2,500	Sarah's actual covered costs: $3,000
Step 1: Determine amount of actual covered costs exceeding section 479B assistance. $3,000 (actual covered costs) **minus** $2,000 (total assistance received under 479B of HEA) **equals** $1,000	Step 2: Determine amount of student financial assistance to include in income. $500 (other student financial assistance received) **minus** $1,000 (amount of actual covered costs exceeding section 479B assistance) **equals** –$500 (if negative, then use $0)
The amount of student financial assistance received by Sarah is less than her actual covered costs after deducting assistance received under 479B of the HEA and other student financial assistance received, therefore there is no student financial assistance to include in income. Amount of student financial assistance included in Sarah's income: $0	

Example G12: Treatment of Student Financial Assistance in Non–Section 8 Programs

Dante is a full-time student, and he received the following amounts to cover his first year of college: Federal Pell Grant: $9,000; Federal Perkins Loan: $13,000; Local Library Scholarship: $1,000.	
Total assistance received under 479B of HEA: $22,000 (Federal Pell Grant plus Federal Perkins Loan) Total other student financial assistance received: $1,000	Dante's actual covered costs: $16,000
Step 1: Determine amount of actual covered costs exceeding section 479B assistance. $16,000 (actual covered costs) **minus** $22,000 (total assistance received under 479B of HEA) **equals** $–6,000	Step 2: Determine amount of student financial assistance to include in income. Not necessary because Step 1 resulted in a negative amount, so all other student financial assistance would be included in Dante's income
Amount of student financial assistance included in Dante's income: $1,000	

G.16.d Section 8 (Including HCV and 202/8)

There are distinct differences in the treatment of student financial assistance between the Section 8 program and the Public Housing and non–Section 8 programs administered by MFH due to language in the annual appropriations acts. Section 210(b) of the Consolidated Appropriations Act, 2023,[G5] requires that, “for purposes of determining the eligibility of a person to receive assistance under section 8 of the United States Housing Act of 1937 (42 U.S.C. 1437f), any financial assistance (in excess of amounts received for tuition and any other required fees and charges) that an individual receives under the Higher Education Act of 1965 (20 U.S.C. 1001 et seq.), from private sources, or from an institution of higher education (as defined under section 102 of the Higher Education Act of 1965 (20 U.S.C. 1002)), shall be considered income to that individual, except for a person over the age of 23 with dependent children.” HUD interprets that “a person over the age of 23” is 24 years old.

While the Consolidated Appropriations Act, 2023, language is limited to federal fiscal year 2023, this does not rule out the possibility that similar language will be included in future years’ appropriations bills. For any funds from a year where HUD’s appropriations include this Section 8 student financial assistance limitation, if the student is the head of household, co-head, or spouse and is under the age of 23 or without dependent children, then both the assistance received under 479B of the HEA and other student financial assistance received by the student will be counted as income to the extent that it exceeds the total of tuition and any other required fees and charges.[G6] In contrast, the student financial assistance received by a Section 8 student who is the head of household, spouse, or co-head of household and is over the age of 23 with dependent children will be treated in a manner identical to the student financial aid received by students who participate in the Public Housing and non–Section 8 programs administered by MFH.

During years in which an appropriations act does not contain this Section 8 student financial assistance limitation (or any other such limitation), then the determination of student financial assistance as included/excluded income for all Section 8 students defaults to the methodology described above for the Public Housing and non–Section 8 programs administered by MFH.

There are two steps required as part of the calculation for Section 8 students, the first of which is to determine the student’s relationship to the household, age, and whether they have dependent children; based on the result of the first step, the second step is to calculate whether any excess student financial assistance should be included in the family’s income. If the student is the head of household, co-head, or spouse and is 23 or younger or does not have dependent children, then 479B assistance **will** be part of the total equation (see example G13, below). If the

[G5] https://www.congress.gov/117/bills/hr2617/BILLS-117hr2617enr.pdf.

[G6] The definition of tuition and other required fees and charges for Section 8 students is synonymous with the definition of “actual covered costs” described in the previous section for the Public Housing and non–Section 8 programs administered by MFH. For Section 8 students, HUD uses the term “tuition and other required fees” solely to reflect the language in the appropriations bill.

student is over 23 with dependent children, then the calculation will be identical for Public Housing and non–Section 8 MFH students, as described above.

The formula for calculating the excess amounts of financial assistance included in annual income is a one-step process of subtracting the total tuition plus required fees and charges from the total student financial assistance from all sources The one-step calculation is illustrated in chart 3, below.

Chart G2: Formula for Calculating Excess Amounts of Financial Assistance

Subtract total tuition plus required fees and charges from the total student financial assistance from all sources to arrive at excess amount of student financial assistance. If the excess amount of student financial assistance is a positive number, then include that amount in annual income. If the excess amount of student financial assistance is zero or negative, then do not include that amount in annual income. If the total tuition plus required fees and charges is zero or exceeds the amount of total financial assistance from all sources, then no excess amounts of student financial assistance will be included in annual income. Any amount of student financial assistance that exceeds the total tuition plus required fees and charges must be included in annual income.

Example G13: Treatment of Student Financial Assistance in Section 8 Programs

Roberto is a 22-year-old full-time student without dependent children. Since Roberto is a Section 8 participant head of household who is not over 23 with dependent children, the PHA/MFH Owner follows the Appropriations Act policy to determine if Roberto receives student financial assistance in excess of tuition from both HEA and other sources. Roberto received the following amounts to cover his first year of college: Federal Pell Grant: $12,000; University Scholarship: $22,000; City Scholarship: $3,000.	
Total assistance received under 479B of HEA: $12,000 (Federal Pell Grant) Total other student financial assistance received: $25,000 Total student financial assistance from all sources: $37,000	Total tuition + required fees and charges: $27,000
Subtract the total cost of tuition + required fees and charges from the total amount of student financial assistance: $37,000 – $27,000 = $10,000	
The total amount of student financial assistance from all sources received by Roberto exceeds the total amount of tuition and required fees and charges.	
Excess student financial assistance: $10,000	
Amount of student financial assistance included in Roberto's income: $10,000	

Example G14: Treatment of Student Financial Assistance in Section 8 Programs

Cedric is a 28-year-old head of household and a full-time student with a 5-year-old daughter and a 9-year-old son who are his dependents. The PHA/MFH Owner will follow the rules under § 5.609(b)(9) (the same as for non–Section 8 programs) as described in the previous section. Cedric received the following amounts to cover his first year of college: Teach Grant: $8,000; Federal Pell Grant: $3,000; College Scholarship: $6,000.	
Total assistance received under 479B of HEA: $11,000 (Teach Grant plus Federal Pell Grant) Total other student financial assistance received: $6,000	Total tuition + required fees and charges: $26,000
Step 1: Determine amount of tuition plus required fees exceeding 479B assistance. $26,000 (total tuition + required fees and charges) **minus** $11,000 (total assistance received under 479B of HEA) **equals** $15,000	Step 2: Determine amount of student financial assistance to include in income. $6,000 (other student financial assistance received) **minus** $15,000 (amount of tuition + required fees and charges exceeding 479B assistance) **equals** –$9,000 (if negative, then use $0)
The amount of other student financial assistance received by Cedric does not exceed the total amount of tuition and required fees and charges.	
Excess student financial assistance: $0	
Amount of student financial assistance included in Cedric’s income: $0	

Example G15: Treatment of Student Financial Assistance in Section 8 Programs

Angel is a 38-year-old full time student, head of household, without dependent children. Since Angel does not have dependent children, the Appropriations Act policy does not apply, and the PHA/MFH Owner must include assistance received under 479B of the HEA as part of the excess student financial aid calculation. Angel received the following amounts to cover her first year of college: Perkins Loan: $8,000.	
Total assistance received under 479B of HEA: $8,000 (Perkins Loan)	Total tuition + other fees and charges: $6,200
Determine whether the amount of student financial assistance, including 479B assistance, exceeds the total of tuition + required fees and charges: $8,000 – $6,200 = $1,800	
Excess student financial assistance: $1,800	
Amount of student financial assistance included in Angel’s income: $1,800	

PHA/MFH Owner Discretion: None.

G.17 Achieving a Better Life Experience (ABLE) Accounts

Regulation: 24 CFR § 5.609(b)(22)

Summary: ABLE accounts are excluded from the definition of net family assets, and therefore income generated from such accounts is not considered when calculating income from assets. Distributions from these accounts are also excluded from income.

HUD developed specific guidance on ABLE accounts based on language included in the ABLE Act of 2014. Certain contributions deposited into ABLE accounts are excluded in addition to the above-mentioned exclusions. See *Treatment of ABLE Accounts in HUD-Assisted Programs* (Notice H 2019–06/PIH 2019–09).

PHA/MFH Owner Discretion: None.

G.18 Income and Distributions from Coverdell Education Savings Accounts, 529 Accounts and "Baby Bond" Accounts

Regulation: 24 CFR § 5.609(b)(10)

Summary: Income and distributions from any Coverdell education savings account under section 530 of the Internal Revenue Code of 1986 or any qualified tuition program under section 529 of such Code; and income earned by government contributions to, and distributions from, "baby bond" accounts created, authorized, or funded by Federal, State, or local government are excluded from income and net family assets.

PHA/MFH Owner Discretion: None.

G.19 Gross Income from Self-Employment or Operation of a Business

Regulation: 24 CFR §§ 5.609(b)(24) and 5.609(b)(28)

Summary: The gross income received by a family through self-employment, or the operation of a business is excluded from income. Gross income is all income amounts received into the business, prior to the deduction of business expenses. To determine the amount of business or self-employment income included in a family's annual income, the net income of the business must first be determined.

Net income is the "gross income amount minus business expenses" that allows the business to operate.

The net income from self-employment or the operation of a business is considered income. Expenditures for business expansion or amortization of capital indebtedness are not deductible when determining the income from a business. An allowance for the depreciation of assets used in a business or profession may be deducted, based on a straight-line depreciation, as provided in IRS's regulations.[G7] Any withdrawal of cash or assets from the operation of a business is income except to the extent that such withdrawal is to reimburse the family member for cash or assets that the family has invested in the operation of the business.

[G7] 26 CFR § 1.167(b)-1 Straight line method: https://www.ecfr.gov/current/title-26/chapter-I/subchapter-A/part-1/subject-group-ECFRc4930337f38ecfd/section-1.167(b)-1.

Example G16: Exclusion of Gross Income from Self-Employment or Operation of a Business

Bill Conrad is the sole owner of BC Lawn Service. BC Lawn Service grossed $75,000 annually in 2024. BC Lawn Service also incurred a total of $35,000 in business expenses, including lawn equipment, rakes, insurance, depreciation of a tractor, and wage payments. After subtracting the $35,000 in business expenses from the $75,000 gross income, the net income is $40,000, which will be included in Bill's calculation of annual income.

PHA/MFH Owner Discretion: None.

G.20 Elimination of the Earned Income Disregard (EID)

Regulation: 24 CFR § 5.611

Summary: The Earned Income Disregard (EID) will not apply to any family who is not eligible for **and already participating in** the disallowance as of December 31, 2023.

The EID allowed eligible families to have a portion of their earned income excluded from annual income for a maximum period of 24 consecutive months.

Although HOTMA eliminates the EID from HUD regulations, families who were receiving the EID benefit as of December 31, 2023, may continue to receive the full benefit until the remaining timeframe for an individual family's EID expires. Because the EID lasts up to 24 consecutive months, no family will still be receiving the EID benefit after December 31, 2025.

Note: The EID policies described above are distinct from similar policies in the Jobs Plus program. Families eligible to receive the Jobs Plus program rent incentive (Jobs Plus Earned Income Disregard (JPEID)) pursuant to the FY2023 Notice of Funding Opportunity (NOFO) or earlier appropriation distributed through prior Jobs Plus NOFOs may continue to receive JPEID under the terms of the NOFO. The JPEID was established by HUD as an alternative requirement to EID for Jobs Plus grantees by waiving section 3(d) of the U.S. Housing Act of 1937 (42 U.S.C. 1437a(d)) and § 960.255(b) and (d). For more information about JPEID waivers and alternative requirements, please review the following *Federal Register* notices: 80 FR 13415 (March 13, 2015) and 83 FR 13506 (March 29, 2018).

PHA/MFH Owner Discretion: None.

G.21 Civil Rights Settlements or Judgments

Regulation: 24 CFR § 5.609(b)(25)

Summary: Civil rights settlements or judgments, including settlements or judgments for back pay, are excluded from the calculation of annual income.

Historically HUD has followed a practice of excluding from income civil rights settlements and judgments as lump-sum additions to assets, which would include amounts received as a result of litigation or other actions, such as conciliation agreements, voluntary compliance agreements, consent orders, other forms of settlement agreements, or administrative or judicial orders under nondiscrimination laws. However, this new exclusion clarifies that even where such payments are not lump-sum payments but instead may have a payment schedule, such payments are excluded. Additionally, this exclusion applies to back pay received by the family pursuant to a civil rights settlement or judgment.

PHA/MFH Owner Discretion: None.

ATTACHMENT H: TOPIC: INFLATIONARY ADJUSTMENTS

Regulations

See table H1, below.

Applicable Programs

HUD Multifamily Housing	HUD Multifamily Housing	Public and Indian Housing
Section 8 (Project Based Rental Assistance)	Section 202/162 PAC, Section 202/8, Section 202/811 PRAC, Section 236 IRP, Section 811 PRA, SPRAC	HCV (including Project-Based vouchers), Public Housing, Section 8 Moderate Rehabilitation, Section 8 Moderate Rehabilitation SRO
Yes	Yes	Yes

Summary

HUD will annually publish the eight inflation-adjusted items in the table below no later than September 1, and the updated values will be shared online at the HUD User website. The publication will apply to both MFH and PIH programs. The revised amounts will be effective on January 1 of the following year. The first set of adjustments for inflation will be made effective January 1, 2025.

HUD plans to publish in the *Federal Register* a notice soliciting the public's comment on HUD's methodology for recalculating inflationary adjusted items.

Table H1: Inflationary Adjustment Items

Adjusted Item	Regulatory Reference	Notice Section	Amount Effective on 1/1/2024 (subject to Annual Adjustment)	Rounding Methodology	Applicable Programs
Eligibility restriction on net family assets	24 CFR § 5.618(a)(1)(i)	Attachment A	$100,000	Nearest dollar	Section 8 PBRA, 202/8, HCV, Public Housing, Section 8 Mod Rehab, Section 8 Mod Rehab SRO
Threshold above which imputed returns must be calculated on net family assets	24 CFR §§ 5.609(a)(2) and (b)(1)	Attachment F	$50,000	Nearest dollar	Section 8 PBRA, 202/8, 202/811 PRAC, 236 IRP, 811 PRA, SPRAC, HCV, Public Housing, Section 8 Mod

					Rehab, Section 8 Mod Rehab SRO
Threshold above which the total value of non-necessary personal property is included in net family assets	24 CFR § 5.603(b) *Net family assets*	Attachment F	$50,000	Nearest dollar	Section 8 PBRA, 202/8, 202/811 PRAC, 236 IRP, 811 PRA, SPRAC, HCV, Public Housing, Section 8 Mod Rehab, Section 8 Mod Rehab SRO
The amount of net assets for which the PHA/MFH Owner may accept self-certification by the family	24 CFR § 5.618(b)(1) 24 CFR § 5.659(e) 24 CFR § 92.203(e)(1) 24 CFR § 93.151(e)(1) 24 CFR § 882.515(a) 24 CFR § 882.808(i)(1) 24 CFR § 960.259(c)(2) 24 CFR § 982.516(a)(3)	Attachment F	$50,000	Nearest dollar	Section 8 PBRA, 202/8, 202/811 PRAC, 236 IRP, 811 PRA, SPRAC, HCV, Public Housing, Section 8 Mod Rehab, Section 8 Mod Rehab SRO
Mandatory deduction for elderly and disabled families	24 CFR § 5.611(a)(2)	Attachment C	$525	Next lowest multiple of $25	Section 8 PBRA, 202/8, 202/811 PRAC, 236 IRP, 811 PRA, SPRAC, HCV, Public Housing, Section 8 Mod Rehab, Section 8 Mod Rehab SRO
Mandatory deduction for a dependent	24 CFR § 5.611(a)(1)	Attachment C	$480	Next lowest multiple of $25	Section 8 PBRA, 202/8, 202/811 PRAC, 236 IRP, 811 PRA, SPRAC, HCV, Public Housing,

					Section 8 Mod Rehab, Section 8 Mod Rehab SRO
Income exclusion for earned income of dependent full-time students	24 CFR § 5.609(b)(14)	Attachment G	$480	Next lowest multiple of $25	Section 8 PBRA, 202/8, 202/811 PRAC, 236 IRP, 811 PRA, SPRAC, HCV, Public Housing, Section 8 Mod Rehab, Section 8 Mod Rehab SRO
Income exclusion for adoption assistance payments	24 CFR § 5.609(b)(15)	Attachment G	$480	Next lowest multiple of $25	Section 8 PBRA, 202/8, 202/811 PRAC, 236 IRP, 811 PRA, SPRAC, HCV, Public Housing, Section 8 Mod Rehab, Section 8 Mod Rehab SRO

HUD will annually publish the recalculated inflationary-adjusted items to HUD's Policy Development and Research Web site, HUD User. The new amounts will become effective January 1 of the following year.

PHAs/MFH Owners must use the adjusted levels post to HUD User for income and asset calculations effective on or after January 1 of the following year. Note that it will be particularly important for PHAs/MFH Owners who begin reexaminations 90 to 120 days in advance of the effective date of the reexamination to update their documents in a timely manner, because several of these figures must be known from the outset of the reexamination. For example, when a PHA/MFH Owner issues a reexamination notice and requests documents from a family, they must be able to provide a form for the self-certification of assets that includes the updated threshold value of net family assets above which the family may not self-certify.

ATTACHMENT I: TOPIC: INTERIM REEXAMINATIONS

Regulations

24 CFR §§ 5.567(c)(1); 882.515(b)(1); 960.257(b)(1); 982.516(c)(1); 891.105; 891.410(g); 891.610(g); and 891.750

Applicable Programs

HUD Multifamily Housing	HUD Multifamily Housing	Public and Indian Housing
Section 8 (Project Based Rental Assistance)	Section 202/162 PAC, Section 202/8, Section 202/811 PRAC, Section 236 IRP, Section 811 PRA[I1], SPRAC	HCV (including Project-Based vouchers), Public Housing, Section 8 Moderate Rehabilitation, Section 8 Moderate Rehabilitation SRO
Yes	Yes	Yes

Summary

A family may request an interim determination of family income or composition because of any changes since the last determination. The PHA/MFH Owner must conduct any interim reexamination within a reasonable period of time after the family request or when the PHA/MFH Owner becomes aware of a change in the family's adjusted income that must be processed in accordance with the final rule. What qualifies as a "reasonable time" may vary based on the amount of time it takes to verify information, but the PHA/MFH Owner generally should conduct the interim reexamination not longer than 30 days after the PHA/MFH Owner becomes aware of changes in income.

The following subsection focuses on HOTMA's revisions to income reexamination requirements. The final rule changes the conditions under which interim reexaminations must be conducted, codifies when interim reexaminations should be processed and made effective, and requires related changes for annual reexaminations and streamlined income determinations. When the PHA/MFH Owner determines that an interim reexamination of income is necessary, they must ask the family to report changes in all aspects of adjusted income. For example, if the family is reporting a decrease in annual adjusted income that is more than 10 percent, but the family also had a change in assets that would result in a change in income, the change in assets must also be reviewed. HUD recommends as a best practice that PHAs/MFH Owners maintain documentation of all reported decreases in annual adjusted income in the family's file, including those that did not result in an interim reexamination. HUD also recommends reviewing the applicable regulations to ensure that any program-specific reexamination requirements are addressed[I2].

[I1] HUD is applying 24 CFR § 5.657 to 811 PRA families pursuant to Section 2.4(a)(1) of the Rental Assistance Contract (RAC) Part II.

[I2] For example, see 24 CFR § 891.410(g) and § 891.610(g)(3).

I.1 Decreases in Adjusted Income

Regulations: 24 CFR §§ 5.657(c)(2); 882.515(b)(2); 891.105; 891.410(g)(2); 891.610(g)(2); 960.257(b)(2); and 982.516(c)(2)

Summary: A family may request an interim determination of family income for **any** change since the last determination. However, the PHA/MFH Owner may decline to conduct an interim reexamination of family income if the PHA/MFH Owner estimates that the family's adjusted income will decrease by an amount that is less than 10 percent of the family's annual adjusted income. PHAs/MFH Owners have the discretion to set a lower percentage threshold, in which case that lower percentage threshold must be included in the ACOP, Administrative Plan, or Tenant Selection Plan, as applicable.

PHAs/MFH Owners must conduct an interim reexamination of family income when the PHA/MFH Owner becomes aware that a family's annual adjusted income has changed by an amount that the PHA/MFH Owner estimates will result in a decrease of 10 percent or more in annual adjusted income or a lower threshold set by HUD or by a PHA/MFH Owner in their ACOP, Administrative Plan, or Tenant Selection Plan, as applicable. In addition to decreases in family income, increases in deductions may produce a sufficient decrease in adjusted income to support an interim reexamination effective January 1, 2024, or later.

HUD is using its discretion, as authorized by HOTMA, to establish a lower threshold through notice to process interim reexaminations under certain circumstances. Specifically, HUD is requiring PHAs/MFH Owners to apply a 0-percent threshold and to process an interim reexamination when there is a decrease in family size attributed to the death or permanent move-out from the assisted unit of a family member during the period since the family's last reexamination that results in a decrease in adjusted income of any amount. If there is no change/decrease in adjusted income as a result of the decrease in family size, then a non-interim transaction is processed instead of an interim reexamination. This 0-percent threshold for interim reexamination applies only to decreases in family size that result in a **decrease** in adjusted income. If the net effect of the changes in annual adjusted income due to a decrease in family size results in an **increase** in annual adjusted income, then PHA/MFH Owner will process the removal of the household member(s) as a non-interim reexamination transaction **without** making changes to the family's annual adjusted income.

Example I1: Interim Reexaminations / Decreases in Annual Adjusted Income

Scenario A: A family with an annual adjusted income of $9,600 experiences a change in household composition and becomes eligible for two dependent deductions totaling $960, resulting in a 10-percent decrease in the family's adjusted income. The $960 decrease in the family's adjusted income would require an interim reexamination, because the income decrease meets the 10-percent threshold for an interim reexamination.

Scenario B: A family experiences an increase in deductible child-care expenses from $0 to $12,000 annually. Before the change, their annual adjusted income was $40,000. Since the child-care expense deduction results in a greater than 10-percent reduction in annual adjusted income, an interim reexamination is required.

Scenario C: A family with an adjusted income of $9,600 adds a dependent family member with no income. This would result in an adjusted income decrease of $480 due to the dependent deduction. The decrease does not meet the 10-percent threshold of the family's adjusted income, and because this is a family member joining the assisted unit (as opposed to a decrease a family size), the PHA/MFH Owner is not required to conduct an interim reexamination. However, the PHA/MFH Owner has adopted a policy that has decreased the threshold from a 10-percent change to a 5-percent change, therefore the decrease would meet the threshold, triggering an interim reexamination.

Scenario D: A family member moved out of the assisted unit. The family's adjusted income prior to the change in household composition was $20,000, but that number decreased to $18,000 when the family member moved out. Since HUD requires PHAs/MFH Owners to process decreases in adjusted income greater than 0 percent due to decreases in family size, the PHA/MFH Owner must process an interim reexamination.

Scenario E: A family member moves into the assisted unit who receives $20,000 in pension income (which is more than 10% of the household's adjusted income). At the same time, the head of household got a new job that increases the household's income by $15,000 per year. The PHA/MFH Owner will process the increase in pension income due to the new household member but will not include the head of household increase in earned income until the next annual reexamination.

PHA/MFH Owner Discretion: PHAs/MFH Owners may establish a percentage threshold lower than 10 percent of annual adjusted income for processing interim reexaminations due to decreases in a family's annual adjusted income. PHAs/MFH Owners must identify in their ACOPs, Administrative Plans, and Tenant Selection Plans, as applicable, the percentage threshold they will use for conducting interim reexamination decreases of a family's annual adjusted income.

PHAs/MFH Owners **are not permitted** to establish a dollar-figure threshold amount instead of a percentage threshold. PHAs/MFH Owners may establish policies to round calculated percentage decreases up or down to the nearest unit (e.g., a calculated decrease of 9.5 percent may be rounded up to 10 percent).

I.2 Increases in Adjusted Income

Regulations: 24 CFR §§ 5.657(c)(3); 882.515(b)(3); 960.257(b)(3); and 982.516(c)(3); 891.105; 891.410(g)(2); and 891.610(g)(2)

Summary: PHAs/MFH Owners must conduct an interim reexamination of family income when the PHA/MFH Owner becomes aware that the family's adjusted income has changed by an amount that the PHA/MFH Owner estimates will result in an increase of 10 percent or more in annual adjusted income or another amount established through a HUD notice, with the following exceptions:

- PHAs/MFH Owners **may not** consider any increases in **earned income** when estimating or calculating whether the family's adjusted income has increased, unless the family has previously received an interim reduction during the same reexamination cycle; and
- PHAs/MFH Owners may choose not to conduct an interim reexamination during the last three months of a certification period if a family reports an increase in income within three months of the next annual reexamination effective date.

Note: 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/MFH Owner's policies.

PHAs/MFH Owners **must not** process interim reexaminations for income increases that result in less than a 10-percent increase in annual adjusted income. When the family previously received an interim reexamination for a decrease to annual adjusted income during the same annual cycle, a PHA/MFH Owner has the discretion to consider or ignore a subsequent increase in **earned** income for the purposes of conducting an interim reexamination. PHAs/MFH Owners must identify in their ACOPs, Administrative Plans, and Tenant Selection Plans, as applicable, if they perform interim reexaminations for **earned** income increases that result in a 10-percent increase in annual adjusted income. If a PHA/MFH Owner has a policy of considering increases in earned income after an interim conducted for a decrease in income, and the family's adjusted income has increased by 10 percent or more, the PHA/MFH Owner must conduct an interim reexamination in accordance with local policies. Conversely, PHAs/MFH Owners that adopt local policies to never consider increases in **earned** income must not perform an interim reexamination.

A series of smaller reported increases in adjusted income may cumulatively meet or exceed the 10-percent increase threshold, at which point the PHA/MFH Owner must conduct an interim reexamination. When an increase of any size is reported by a family, it is a recommended best practice for the PHA/MFH Owner to note the reported increase in the tenant file.

Example I2: Interim Reexaminations / Increases in Annual Adjusted Income

Scenario A: The Martinez family's annual reexamination is due on 11/1/2024. The family no longer has child-care expenses for their three children. The family stopped paying for daycare as of 8/31/2024 and reported the change (and certified no other changes to annual household income or expenses) to the PHA/MFH Owner on 9/7/2024, resulting in an estimated 15-percent increase in the family's annual adjusted income. Although 15 percent is well above the 10-percent threshold, the PHA/MFH Owner does not process an interim reexamination, because they have a policy to not process changes reported within three months of the next annual reexamination.

Scenario B: The Allen family had an annual adjusted income of $29,000 as of their last annual reexamination effective 5/1/2024. The family experienced the following changes to income and household composition since 5/1/2024:

- In July, the Allen family's eldest child, Kristina Allen (age 20), starts going to college full-time on a Pell Grant. Kristina is not employed, nor does she receive any other type of student financial assistance. The family now qualifies for a $480 dependent deduction, because full-time students are considered dependents.
- The family reports Kristina's student status to the PHA/MFH Owner, which noted the change in the family's file. The PHA/MFH Owner is not allowed to perform an interim reexamination, because the dependent deduction represents a 1.7-percent decrease in the family's annual adjusted income, and the PHA/MFH Owner did not establish a threshold lower than 10 percent for interim decreases in income.
- In October, the family added an adult family member, Tom Smith, to the household. The new adult family member receives a pension of $275 monthly, or $3,300 annually.

The PHA/MFH Owner determined that the Allen family's new annual adjusted income is $31,820, accounting for both the addition of Tom's pension income and the deduction of the full-time student dependent allowance for Kristina. The Allen family's annual adjusted income increased a total of $2,820, or only 9.7 percent. Since this decrease is below the 10-percent threshold, the PHA/MFH Owner will not conduct an interim reexamination. Instead, they will process a non-interim transaction to add Tom to the family without changing the family's annual adjusted income effective 10/1/2024.

Scenario C: The Nguyen family's last annual reexamination was 4/1/2024. In June 2024, Patrick Nguyen lost his job, and the family's adjusted income fell from $25,000 to $13,000. The PHA/MFH Owner conducted an interim reexamination for the decrease in income. In November 2024, Kelly Nguyen finds a job, and the family's adjusted income rises to $18,000. The PHA/MFH Owner has a policy of considering increases in earned income when an interim reexamination has been performed for a decrease in income. Since the family's adjusted income has increased by more than 10 percent when including earned income, and the family previously received an interim reduction during the same reexamination cycle, the PHA/MFH Owner will conduct an interim reexamination for the increase.

Scenario D: The Mosberg family had an annual adjusted income of $35,909 based on earned income (and two dependent deductions) as of the last annual reexamination effective 6/1/2024. The family experienced the following changes to income since 6/1/2024:

- In August, Libby reported she received a raise at work, increasing her annual earned income by $2,650. She also recently started receiving monthly child support payments of $150, or $1,800 annually. She reported no other changes to the PHA/MFH Owner. While the **combined** increase of earned income (wages) and unearned income (child support) is a 12.3-percent increase in annual adjusted income since the 6/1/2024 annual reexamination, the PHA/MFH Owner must look at the earned and unearned income changes independently to determine if an interim reexamination should be performed. The earned income is about 7 percent of the increase, and the unearned income is approximately 5 percent of the total 12.3-percent increase.

The PHA/MFH Owner documented in the tenant file that the family reported the change, but an interim reexamination was **not** performed, because the 5-percent increase in annual adjusted income based on **unearned** income does not meet the 10-percent threshold. Further, the PHA/MFH Owner may not perform an interim reexamination for Libby's 7-percent increase in annual adjusted income based on **earned** income, because an interim reexamination for an income decrease during the reexamination cycle was not completed **and** it does not meet the 10-percent threshold to perform an interim. Note: Even if Libby's change in earned income had exceeded 10 percent of her annual income, the PHA/MFH Owner may not perform an interim reexamination, because there was no prior interim reexamination for a decrease in income.

In November, Libby reported that her monthly child support payments increased again, from $150 to $325. She certified no other changes to income or deductions. Libby's annual **unearned** income from child support of $3,900 is now a 10.8-percent increase in annual adjusted income (based on the effective 6/1/2024 annual reexamination), so the PHA/MFH Owner **must** perform an interim reexamination, but only for the **unearned** child support income. The PHA/MFH Owner will continue to disregard the increased **earned** income reported by the family until the Mosberg's next annual reexamination.

PHA/MFH Owner Discretion: PHAs/MFH Owners have discretion on the following policies:

- Whether the PHA/MFH Owner will conduct interim reexaminations for income increases reported by families within the last three months of a family's reexamination period; and
- Whether the PHA/MFH Owner will count increases in earned income when estimating or calculating whether the family's adjusted income has increased when the family previously received an interim reduction during the same reexamination cycle and whether they will conduct interim reexaminations when families previously underwent interim reexaminations for decreases in income (both earned and unearned income).

PHAs/MFH Owners must establish policies for the above-discretionary items in their ACOPs, Administrative Plans, and Tenant Selection Plans, as applicable.

PHA/MFH Owner Discretion: None.

I.3 Interim Reexaminations to Determine Public Housing Over-Income Status

Regulations: 24 CFR § 960.507

Summary: Regardless of changes in adjusted annual income, in some circumstances PHAs are required to conduct interim reexaminations of Public Housing families to determine whether they continue to exceed the income limit. When a PHA makes an initial determination that a Public Housing family is over-income during an interim reexamination, the PHA must conduct a second interim reexamination 12 months after the over-income determination, and then again 12 months after the second over-income determination, unless the family's income falls below the over-income limit during the 24-month period.

Per 24 CFR 960.507(c), PHAs are required to conduct income examinations of Public Housing families who have been determined to exceed the over-income limit at specific intervals. This continued evaluation of the family's over-income status requires the PHA to notify any family that exceeds the over-income limit that they remain over the income limit, even if the family is paying the flat rent. (24 CFR 960.253). The PHA must conduct an income examination 12 months after the initial over-income determination to determine and provide notification if the family remains over-income, unless the PHA determined the family's income fell below the over-income limit since the initial over-income determination. The PHA must again conduct an income examination and provide notification 24 months after the initial over-income determination, unless the PHA determined the family's income fell below the over-income limit since the second over-income determination. An interim income reexamination to determine if a Public Housing family remains over-income does not reset the family's normal annual reexamination date.

See Notice PIH 2023–03 (HA) for additional guidance on the required reexaminations and notice for over-income Public Housing families.

Example I3: Interim Reexamination to Public Housing Over-Income Status

Scenario A: Uninterrupted Grace Period: The Blayney Family

In June 2024, the PHA processed an interim reexamination for the Blayney family effective 7/1/2024 due to an increase in the family's annual adjusted income of 10 percent or more. The PHA sent written notification of its initial determination that the family's income exceeds the applicable over-income limit. The 24-month grace period starts.

The PHA must conduct an interim reexamination 12 months later, or by 7/1/2025, to determine if the Blayney family remains over-income, even if the family is paying a flat rent. The PHA must notify the Blayney family that their income has exceeded the over-income limit for 12 consecutive months.

After completion of the 7/1/2025 interim reexamination, the Blayney family's income continued to exceed the applicable over-income limit for an additional 12 consecutive months. The PHA must conduct a second interim reexamination, even if the family is paying flat rent, 24 months from the initial determination, or by 7/1/2026, to determine if the family remains over-income.

At the 7/1/2026 interim reexamination, the Blayney family's income continued to exceed the applicable over-income limit. The PHA must either terminate their tenancy in no more than six months from the end of the 24-consecutive-month grace period, by 1/1/2027, or charge them the alternative non–public housing rent (at the next lease renewal or in no more than 60 days after the final notice, whichever is sooner), depending on the PHA's continued occupancy policies.

Scenario B: Interrupted Grace Period: The Morrison Family

The Morrison family experienced an income increase that resulted in an interim reexamination effective 2/1/2024. The family was sent the required written notification no later than 30 days after the PHA's initial determination of the family's over-income status. The 24-month grace period starts. The PHA must conduct an interim reexamination 12 months later, or by 2/1/2025, to determine if the family remains over-income, even if the family is paying a flat rent. After completion of the interim reexamination effective 2/1/2025, the Morrison family remained over the applicable over-income limit. The PHA must conduct a second interim reexamination, even if the family is paying a flat rent, 24 months from the initial determination, or by 2/1/2026, to determine if the family remains over-income. However, at a regularly scheduled annual reexamination effective 5/1/2025, the family is determined to no longer be over-income. This is prior to the expiration of the 24-month grace period on 2/1/2026. Thus, the grace period no longer applies, and the family remains an income-eligible PH program participant. If the family is determined to be over-income again in the future, they would be entitled to a new 24-consecutive-month grace period.

PHA Discretion: None.

I.4 Non-Interim Reexamination Transactions

Regulations: 24 CFR §§ 5.657(c)(2) 891.105; 891.410(g)(2); and 891.610(g)(2)

Summary: Families may experience changes within the household that do not trigger an interim reexamination under HOTMA but still need to be reported in a non-interim reexamination submission to HUD. In these cases, PHAs/MFH Owners will submit a separate, new action code on form HUD–50058/HUD–50059. Further instructions on the use of this action code will be provided along with supplemental guidance on other revisions to forms HUD–50058/HUD–50059. The code will be used for the following transaction types when an interim reexamination is not triggered under the final rule:

- Adding or removing a hardship exemption for the child-care expense deduction;
- Updating or removing the phased-in hardship relief for the health and medical care expense deduction and/or reasonable attendant care and auxiliary apparatus expense deduction (the phased-in relief will begin at an eligible family's first annual or interim reexamination, whichever is sooner, after January 1, 2024);
- Adding or removing general hardship relief for the health and medical care expense deduction and/or reasonable attendant care and auxiliary apparatus expense deduction;
- Adding or removing a minimum rent hardship;
- Adding or removing a non-family member (i.e., live-in aide, foster child, foster adult);
- Ending a family's EID or excluding 50 percent (decreased from 100%) of a family member's increase in employment income at the start of the second 12-month EID period.
- Adding a family member and the **increase in adjusted income** does not trigger an interim reexamination under the final rule;
- Removing a family member and the **increase in adjusted income** does not trigger an interim reexamination under the final rule;

- Adding/updating a family or household member's Social Security number; and
- Updating a family member's citizenship status from eligible to ineligible or vice versa, resulting in a change to the family's rent and/or utility reimbursement, if applicable (i.e., family begins receiving prorated assistance or previously prorated assistance becomes full assistance), or updating the prorated rent calculation due to the addition or removal of family members in household with an ineligible noncitizen(s).

HCV Program Only:

- Processing contract rent changes that do not correspond with an interim or annual reexamination (including PBV rent increases);
- Implementing an update to the payment standard that does not correspond with an interim or annual reexamination.

Note: PHAs/MFH Owners will make all other changes to assets, income, and deductions at the next annual or interim reexamination of income, whichever is sooner.

I.5 Policies for Families to Report Changes to Annual Adjusted Income or Household Composition

Regulations: 24 CFR §§ 5.657(c)(4); 882.515(b)(1)–(4); 882.808(i)(4); 891.105; 891.410(g)(2); 891.610(g)(2); 960.257(b)(4); and 982.516(d)

Summary: PHAs/MFH Owners must require families to report **household composition changes**; however, PHAs/MFH Owners determine the timeframe in which reporting happens. PHAs/MFH Owners must develop policies that describe when and under what conditions families must report **changes in annual adjusted income** consistent with the new requirements for processing interim reexaminations. PHAs/MFH Owners are responsible for educating families on the requirements for reporting changes. Families are responsible for reporting these changes to the PHA/MFH Owner. It is the PHA's/MFH Owner's responsibility to track all reported changes to a family's annual adjusted income to ensure that the PHA/MFH Owner is correctly processing interim reexaminations in accordance with HUD's requirements.

A PHA's/MFH Owner's policies may require families to report only changes that the family estimates meet the threshold for an interim reexamination, and the PHA/MFH Owner must determine if an interim reexamination is necessary. Alternatively, PHAs/MFH Owners may establish policies requiring that families report all changes in income and household composition, and the PHA/MFH Owner will subsequently determine if the change requires an interim reexamination.

PHA/MFH Owner Discretion: PHAs/MFH Owners have the discretion to develop specific reporting policies that describe which changes must be reported to the PHA/MFH Owner and the timeline for reporting the change. For example, PHAs/MFH Owners may develop policies stipulating that families are not required to report **any** income increases that become effective within the last three months of the family's certification period, or PHAs/MFH Owners may develop policies requiring families to report all changes to household composition, income, and deductions within 10 days of the change.

I.6 Processing Time Period for Interim Reexaminations

Regulations: 24 CFR §§ 5.657(c)(1); 882.515(b)(1); 891.105; 891.410(g)(2); 891.610(g)(2); 960.257(b)(1); and 982.516(c)(1)

Summary: The updated regulations codified long-standing guidance on how long PHAs/MFH Owners should take to process an interim reexamination.

Families may request an interim determination of income or household composition because of any changes since the last determination. While the PHA/MFH Owner may decline to conduct an interim reexamination of family income if they estimate the family's annual adjusted income will change by less than 10 percent, when the PHA/MFH Owner conducts an interim reexamination, it must be conducted within a reasonable period after the family's request or after the PHA/MFH Owner becomes aware of an increase in the family's adjusted income. What qualifies as a "reasonable time" may vary based on the amount of time it takes to verify information, but the PHA/MFH Owner generally should conduct the interim reexamination not longer than 30 days after the PHA/MFH Owner becomes aware of changes in income.

PHA/MFH Owner Discretion: None.

I.7 Effective Date of Interim Rent Changes

Regulations: 24 CFR §§ 5.657(c)(5); 882.515(b)(4)–(b)(5); 891.105; 891.410(g)(2); 891.610(g)(2); 960.257(b)(6); and 982.516(c)(4)

Summary: The updated regulation codified long-standing guidance on when interim reexaminations are made effective.

- **Changes Reported Timely:** If the family has reported a change in family income or composition in a timely manner according to the PHA/MFH Owner's policies, then the PHA/MFH Owner must provide the family with a 30-day advance notice of any rent increases, and such rent increases will be effective the first day of the month beginning after the end of that 30-day period.

  If the tenant has complied with the interim reporting requirement and the tenant's rent is anticipated to decrease, rent decreases will be effective on the first day of the month after the date of the actual change leading to the interim reexamination of family income. This means the decrease will be applied retroactively.

- **Changes Not Reported Timely:** If the family has failed to report a change in family income or composition in a timely manner according to the PHA/MFH Owner's policies, PHAs/MFH Owners must implement any resulting rent increases retroactively to the first day of the month following the date of the change leading to the interim reexamination of family income.

  Any resulting rent decrease must be implemented no later than the first rent period following completion of the reexamination. The PHA/MFH Owner may choose to adopt a policy that would make the effective date of an interim reexamination retroactive to the first of the month following the date of the actual decrease in income as opposed to the first of the month following completion of the reexamination. PHAs/MFH Owners may also choose to establish conditions or requirements for when such a retroactive application would apply (e.g., where a family's ability to report a change in income promptly may have been hampered due to extenuating circumstances such as a natural disaster or disruptions to the PHA/MFH Owner management operations).

PHAs/MFH Owners that choose to adopt such policies must ensure the earliest date that the retroactive decrease is applied is the later of the first of the month following the date of the change that led to the interim reexamination, or the first of the month following the most recent previous income examination (i.e., most recent interim or annual reexamination or the family's initial examination if that was the family's only income examination before the interim reexamination in question).

In applying a retroactive change in rent or family share as the result of an interim reexamination, the PHA/MFH Owner must clearly communicate the effect of the retroactive adjustment to the family so that there is no confusion over the amount of the rent that is the family's responsibility. In the HCV and Moderate Rehabilitation/SRO programs, the PHA must also clearly communicate the effect of the retroactive adjustment to the owner as well. These policies may reduce the potential hardship on families and eliminate or significantly reduce the amount a family may owe the PHA for back rent if the family has had difficulty in making timely rent payments during the time between the loss of income and the interim reexamination.

An exception to the requirement that a PHA/MFH Owner implement resulting rent increases retroactively to the first of the month following the date of the change leading to the interim reexamination exist if a PHA/MFH Owner failed to process a family's interim reexamination because the family did not timely report an income decrease, as illustrated in example I4, scenario D, below.

Example I4: Effective Date of Interim Rent Changes

Scenario A: The Miller family had a decrease in family income that met the threshold due to the loss of a job on 6/2/2024. They reported the decrease to the PHA/MFH Owner in accordance with the PHA/MFH Owner's policies on 6/15/2024. The interim reexamination must be effective 7/1/2024, regardless of when the PHA/MFH Owner processes the interim reexamination.

Scenario B: The Leon family had an increase of 10 percent or more in annual adjusted income on 6/1/2024 due to receiving a new type of benefit income. The increased income meets the threshold to require an interim. They reported the increase to the PHA/MFH Owner in accordance with local policies on 6/20/2024. The PHA/MFH Owner did not process the interim reexamination until 7/11/2024, so the effective date of the interim reexamination is 9/1/2024 to give the family the required 30-day notice of the increase in total tenant portion.

Scenario C: The Nguyen family had a family member join the household, thereby increasing the annual adjusted income by 10 percent or more due to the new member's Social Security income starting on 8/1/2024. The increased income meets the threshold to require an interim. However, the change in income was not reported to the PHA/MFH Owner until 9/15/2024. The PHA/MFH Owner has a policy requiring a family to report changes in family income within 30 days. Because the family failed to alert the PHA/MFH Owner of the increase in income in accordance with the PHA/MFH Owner's policy, the increased income is effective retroactive to 9/1/2024, the first of the month following the date of the income change.

Scenario D: The Housseini family's current annual reexamination is effective on 2/1/2024. A member of the Housseini family lost their job on 1/2/2024, but the family failed to report the change until 4/5/2024. If the PHA/MFH Owner has a written policy allowing for retroactive rent decreases even when the family does not report changes timely, the retroactive rent decrease could be applied on 3/1/2024 (the first of the month following the family's most recent previous income examination).

PHA/MFH Owner Discretion: PHAs/MFH Owners must establish policies describing when and under what conditions a family is required to report changes in family income or composition in order to meet the "timely manner" requirement. PHAs/MFH Owners must update their Administrative Plans, ACOPs, or Tenant Selection Plans, as applicable, to include these policies and must communicate them clearly to participating families.

PHAs/MFH Owners may adopt a policy to apply rent decreases retroactively for circumstances in which families fail to report changes in a timely manner. A retroactive rent decrease may not be applied prior to the later of either the first of the month following the date of the actual decrease in income, or the first of the month following the most recent previous income examination. PHAs/MFH Owners may establish additional criteria to describe the conditions under which retroactive decreases will be applied (e.g., the kinds of extenuating circumstances that may inhibit timely reporting). In all cases of retroactive application, the PHA/MFH Owner must clearly communicate to the family how the retroactive adjustment will affect their responsibility for rent. In the HCV and Moderate Rehabilitation programs, the PHA must also clearly communicate the impact of the retroactive adjustment to the owner.

I.8 Streamlined Income Determination

Regulation: 24 CFR §§ 5.609(c)(2)(i); 5.657(d); 891.105; 891.410(g)(4); 891.610(g)(4); 960.257(c); and 982.516(b)

Summary: HOTMA did not update or otherwise change the streamlined income determination provision codified in the FAST Act[I3] and in HUD's regulations found in 24 CFR §§ 5.657(d), 960.257(c), and 982.516(b); however, PHAs/MFH Owners should be aware that the adjustments of non-fixed income sources at annual reexamination using third-party verification must follow the HOTMA income calculation rules outlined in Attachment B (Calculating Income) of this notice.

Under current program regulations, PHAs/MFH Owners may elect to apply a streamlined income determination for families receiving fixed income[I4]using the methodology below. For any income determined pursuant to a streamlined income determination, a PHA/MFH Owner must obtain third-party verification of all income amounts every 3 years.

When **90 percent or more** of a family's unadjusted income consists of fixed income, owners using streamlined income determinations must apply a COLA or COLAs to the family's fixed-income sources, provided that the family certifies both that 90 percent or more of their unadjusted income is fixed income and that their sources of fixed income have not changed from the previous year. Sources of non-fixed income need not be adjusted and must not be adjusted by a COLA, but PHAs/MFH Owners may choose to adjust sources of non-fixed income by the amount determined on the basis of third-party verification. PHAs/MFH Owners have the discretion to either adjust the non-fixed

[I3] P.L. 114–94.

[I4] 24 CFR §§ 5.657(d)(2); 960.257(c)(2); and 982.516(b)(2); 891.410(g)(4); and 891.610(g)(4).

income or carry over the calculation of non-fixed income from the first year to years 2 and 3. Adjustments to non-fixed income must be calculated in accordance with section 14.2 (Annual Reexamination) of this notice.

When **less than 90 percent** of a family's unadjusted income consists of fixed income, owners using streamlined income determinations must apply a COLA to each of the family's sources of fixed income. Owners must determine all other income pursuant to section 14.2 (Annual Reexaminations) of this notice.

The table below explains the applicable PHA/MFH Owner action at each point in time in the streamlining cycle.

Table I1: PHA/MFH Owner Action at Point in Time in Streamlining Cycle

Point in Time in Streamlining Cycle	PHA/MFH Owner Action
Year 1	PHA/MFH Owner completes a Move in, Initial Certification (MFH Only) or Annual Reexamination consistent with the regulations on reexaminations.
Years 2 and 3	PHA/MFH Owner completes an Annual Reexamination with the following streamlined income determination for each type of source: • **Fixed Income:** Apply inflation adjustment factor; PHA/MFH Owner does not collect third-party verification. • **Non-fixed income when fixed income is more than 90 percent of unadjusted income:** PHA/MFH Owner has discretion to either adjust the income using third-party verification or use the previous year's calculation. • **Non-fixed income when fixed income is less than 90 percent of unadjusted income:** PHA/MFH Owner must adjust the income using third-party verification. • **Assets and Deductions:** PHA/MFH Owner completes verification and calculation of assets and deductions.
Year 4	Three-year cycle starts over.

PHA/MFH Owner Discretion: PHAs/MFH Owners have the discretion to implement streamlined income determinations under current program regulations.

I.9 Impact of Interim Reexamination Requirements on Family Self-Sufficiency (FSS) Programs

Summary: PHAs/MFH Owners who operate FSS programs should note two effects that the new interim reexamination regulations will have on families participating in their FSS programs.

First, HOTMA requires that interim reexaminations must be conducted: (1) when a family's income decreases by at least 10 percent of their annual adjusted income, or such lower threshold established by a PHA/MFH Owner or by HUD through notice; or (2) when a family's income increases by at least 10 percent of their annual adjusted income or such other amount established by HUD through notice, except in certain circumstances as described earlier in paragraph I.2 (Increases in Adjusted Income) of this notice.

PHAs/MFH Owners may not consider any increases in **earned income** when estimating or calculating whether the family's adjusted income has increased unless the family has previously received an interim reduction during the same reexamination cycle. Families participating in the FSS program are subject to these interim requirements, therefore their escrow accounts may not grow as their earnings increase throughout the year.

Second, the "Streamlining and Implementation of Economic Growth, Regulatory Relief, and Consumer Protection Act Changes to Family Self-Sufficiency Program" final rule states that the FSS contract of participation (COP) will generally expire 5 years **from the date of the family's first re-certification of income after** the effective date of the FSS COP. The PHA/MFH Owner may not perform an interim reexamination of annual income when enrolling a family in the FSS program unless the family experienced a change in annual adjusted income that meets the threshold for conducting an interim reexamination under the HOTMA final rule. Families for whom their first reexamination of income does not occur until their regularly scheduled annual reexamination will not have the opportunity to begin escrowing their increased earnings until that time and may have fewer escrow increases over the life of the 5-year contract.

Although families participating in FSS may experience fewer escrow increases under the HOTMA final rule, the revised interim reexamination regulations may provide these families the opportunity to use their increased earnings to realize other short- or long-term goals outside of the scope of the FSS program, such as investing in a hobby, going on a vacation with family, purchasing a car, etc.

PHA/MFH Owner Discretion: None.

ATTACHMENT J: TOPIC: VERIFICATION

Regulations

24 CFR §§ 5.216(g)(1); 5.230; 5.230(c)(5)(iii); 5.232; 24 CFR 5.232(c); 5.233; 5.240(c); 5.609(c)(3); 5.659(d); 891.105; 891.410(b)-(c) and (g); 891.610(b)-(c) and (g); 891.750; 960.259(c); and 982.516(a)(2)

Applicable Programs

HUD Multifamily Housing	HUD Multifamily Housing	Public and Indian Housing
Section 8 (Project Based Rental Assistance)	Section 202/162 PAC, Section 202/8, Section 202/811 PRAC, Section 236 IRP, Section 811 PRA, SPRAC	HCV (including Project-Based vouchers), Public Housing, Section 8 Moderate Rehabilitation, Section 8 Moderate Rehabilitation SRO
Yes	Yes	Yes

Summary

The final rule updated verification of income requirements in 24 CFR §§ 5.230; 5.232; 5.233; 5.609; and 5.659.

Subtopics

J.1 Authorization for the Release of Information (Forms HUD–9886/HUD–9887)

Regulations: 24 CFR §§ 5.230; 5.232; 891.105; 891.410(b)-(c); and 891.610(b)-(c)

Summary: In accordance with the final rule, all applicants must sign the consent form at admission, and participants must sign the consent form no later than their next interim or regularly scheduled income reexamination. After an applicant or participant has signed and submitted a consent form either on or after January 1, 2024 (regardless of the PHA/MFH Owner's compliance date), they do not need to sign and submit subsequent consent forms at the next interim or regularly scheduled income examination except under the following circumstances[J1]:

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

These consent forms contain provisions authorizing HUD and the PHA/MFH Owner to obtain necessary information for verification of an application or to maintain a family's assistance, including income information and tax return information. The executed 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/MFH Owner to

[J1] Any person, regardless of age, who subsequently becomes a family member as the head of household, co-head of household, or spouse, must sign the consent form, in accordance with 24 CFR § 5.230(a).

revoke consent. If a family voluntarily leaves a HUD program, the family's assistance is considered to be terminated and the signed consent forms will no longer be in effect.

HUD will publish a new form HUD–9886–A and is updating forms HUD–9887 and HUD–9887–A (Fact Sheet) to conform with the final rule. HUD will include language in the forms allowing PHAs/MFH Owners to obtain financial records from financial institutions whenever the PHA/MFH Owner determines that such a record is needed to determine an applicant's or participant's eligibility for assistance or level of benefits.

PHA/MFH Owner Discretion: PHAs/MFH Owners have the discretion to establish policies around when family members must sign the consent forms when they turn 18 between reexaminations. PHAs/MFH Owners must establish these policies in their ACOPs, Administrative Plans, and Tenant Selection Plans, if requiring family members to sign consent forms at intervals other than at reexamination.

J.2 Revocation of Consent

Regulations: 24 CFR §§ 5.230(c)(5)(iii); 24 CFR 5.232(c); 891.105; 891.410(g)(3)(ii); and 891.610(g)(3)(ii)

Summary: The executed 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/MFH Owner to revoke consent. Revocation of consent or refusal to sign the consent forms prohibits the PHA/MFH Owner from requesting and accessing income information and financial records, including pulling EIV reports and using the EIV data to verify income (although the data matches between HUD and other agencies will continue to occur automatically if the family is not terminated from the program). PHAs/MFH Owners will not be able to process interim or annual reexaminations of income, including when a family's income decreases and the family requests an interim reexamination to decrease tenant rent, without the family's executed consent form(s).

Families have the right to revoke consent by providing written notice to the PHA/MFH Owner; however, revoking consent may result in termination of assistance or denial of admission, if the PHA/MFH Owner has a policy that the revocation of consent will result in termination of assistance or denial of admission. When PHAs/MFH Owners do not establish such a policy, the family is required to sign a new consent form by the next reexamination, whichever occurs first, in order to avoid termination of assistance or be reviewed for eligibility for admission. PHAs/MFH Owners must explain to families the consequences, if any, of revoking their consent.

PHAs/MFH Owners must notify their local HUD office of a family's revocation of consent.

PHA/MFH Owner Discretion: PHAs/MFH Owners may decide whether revocation of a family's consent will result in termination of assistance or denial of admission. Such a policy must be included in the PHA/MFH Owner's Administrative Plan, ACOP, or Tenant Selection Plan, as applicable.

J.3 Mandated and Discretionary use of HUD's Enterprise Income Verification (EIV) System

Regulation: 24 CFR § 5.233

Summary: The regulation clarifies that PHAs/MFH Owners must use EIV to verify tenant employment and income information at annual and streamlined reexaminations of family composition and income. However, PHAs/MFH Owners are no longer required to use EIV to verify tenant employment and income information during an interim reexamination of family composition and income.

PHAs/MFH Owners are still required to use EIV in its entirety, including using all of the required reports, such as the Existing Tenant Search and Income Reports, to verify tenant employment and income information at all other times.

Note: HUD intends to update the discrepancy logic for the MFH and Public Housing Income Discrepancy Reports and the Income Verification Tools (IVTs) to conform to the requirements of the final rule. PHAs/MFH Owners are not required to investigate discrepancies resulting from the MFH and Public Housing Income Discrepancy Reports and the IVT Tools until HUD updates the discrepancy logic. HUD will notify PHAs/MFH Owners when the new reports are ready for use.

Table J1 provides guidance on the frequency with which individual EIV reports must be utilized by a PHA/MFH Owner.

Table J1: Mandatory and Discretionary Use of EIV by PHAs/MFH Owners

Report Title	**Report Description**	**Frequency of Use**	**PHAs/MFH Owners**
Debts Owed to PHAs & Terminations	Allows users to access information concerning former tenants who left owing a debt to a PHA or who had their voucher terminated for cause.	At the time of processing an applicant family for admission, and to enter debt information or terminations for families who have ended program participation.	PHAs only Report does not exist in MFH EIV.
Deceased Tenants Report	Identifies tenants reported by Social Security Administration (SSA) as being deceased.	At least quarterly	PHAs/MFH Owners
Existing Tenant Search	Identifies applicants who may be receiving assistance at another Multifamily project or PIH location.	At the time of processing an applicant family for admission	PHAs/MFH Owners
Failed EIV Prescreening Report	Identifies tenants who have missing or invalid personal identifiers (last name, date of birth, SSN) in HIP/TRACS. These tenants will not be sent to SSA from EIV for the SSA identity test.	Monthly	PHAs/MFH Owners
Failed Verification Report (Failed	Identifies tenants whose personal identifiers (last name, date of birth, SSN) do not match the SSA database.	Monthly	PHAs/MFH Owners

SSA Identity Test)	*PHAs/MFH Owners that admit families using a self-certification of SSN must review the Failed SSN Verification Report monthly to identify and follow up on new issues.		
Identity Verification Report	Identifies tenants that, failed SSA verification, and failed EIV pre-screening.	Monthly	PHAs/MFH Owners
Income Discrepancy Report for MFH Programs	Identifies households where there is an income discrepancy in the wage, unemployment, and SSA benefit information reported in EIV and wage, unemployment, and SSA benefit information reported in TRACS for the period of income used for discrepancy analysis. The report serves as a tool to alert MFH Owners that there may be a discrepancy in the income reported by the tenant during the period of income used for the discrepancy analysis.	Must be used at annual reexamination. MFH Owners may use the report at other intervals, in accordance with the MFH Owner's written EIV policies and procedures. MFH Owners **are not** required to use the report at annual reexamination if they used Safe Harbor verification to determine the family's income at the last reexamination. *See note under Summary above about updates to the MFH Income Discrepancy Report.	MFH Owners

Income Information for PIH Programs Income Report for MFH Programs	Provides employment and income reported by HHS and SSA for each household member that passes the SSA identity test. Identifies tenants who: • May not have reported complete and accurate income information; and/or • May be receiving multiple subsidies.	Must be used at annual reexamination; not required at interim reexaminations. PHAs/Owners may use, if desired. PHAs/MFH Owners **are not** required to use at annual reexamination if they use Safe Harbor verification to determine the family's income. **New Admissions:** Review new admissions within 120 days after the move-in information is transmitted to HUD to confirm/validate the income reported by the household.[J2]	PHAs/MFH Owners
Income Validation Tool Report for PIH Programs	Provides projections of discrepant income for wages, unemployment compensation, and SSA benefits pursuant to HUD's data sharing agreements with the Department of Health and Human Services (HHS) using the National Directory of New Hires (NDNH) database, and the SSA.	PHAs are required to obtain an EIV Income and Income Validation Tool Report for each family any time the PHA conducts an annual reexamination of family income and composition. PHAs may use the report at other intervals, in accordance with the PHA's ACOP or Administrative Plan. PHAs **are not** required to use the report at annual reexamination if they used Safe Harbor verification to determine the family's income at the last reexamination. *See note under Summary above about updates to the MFH and Public Housing Income Discrepancy Reports.	PHAs

[J2] PHAs/MFH Owners must rely on other documents (e.g., pay stubs, benefit award letters, etc.) to verify families' income eligibility before admission.

Multiple Subsidy Report	Identifies tenants who may be receiving rental assistance at more than one location.	At least quarterly	PHAs/MFH Owners
New Hires Report	Identifies tenants who have new employment within the last six months. Report is updated monthly.	PHAs/MFH Owners must review this information at annual reexamination except when the PHA/MFH Owner uses Safe Harbor verification to determine the family's income. PHAs/MFH Owners that do not require families to undergo interim reexaminations (IRs) for income increases after an IR decrease do not need to review this report at all between a family's annual reexamination. If the PHA/MFH Owner's policy is to require an IR for increases in income after an IR decrease, then the PHA/MFH Owner must review the report quarterly after the family's IR decrease.	PHAs/MFH Owners
No Income Reported by HHS or SSA	Identifies tenants who passed the SSA identity test but where no income was reported by HHS or SSA. This scenario does not mean that the tenant does not have any income. PHAs/MFH Owners must obtain written, third-party verification of any income reported by the tenant.	As identified in a PHA's ACOP or Administrative Plan or a MFH Owner's written EIV policies and procedures.	PHAs/MFH Owners
No Income Reported on 50059	Identifies households where there is no income listed on the HUD–50059.	As identified in MFH Owner's written EIV policies and procedures.	MFH Owners

Summary Report	Summary of household information from the current, active certification in the TRACS file at the time of the income match.	Must be used at annual reexamination; not required at interim reexaminations. MFH Owners may use the report at other intervals, if desired, as described in the MFH Owner's written EIV policies and procedures.	MFH Owners

PHA/MFH Owner Discretion: PHAs/MFH Owners may choose to use EIV to verify tenant employment and income information at interim reexaminations of family composition and income. PHAs that choose to use EIV to verify income information at interim reexaminations must include this information in the PHA's ACOP and/or Administrative Plan. MFH Owners who choose to use EIV to verify tenant employment and income information at interim reexaminations must establish this policy in their written EIV policies and procedures. Any policy adopted by a PHA/MFH Owner must be applied consistently for all households.

J.4 Determination of Income Using Other Means Tested Public Assistance (i.e., "Safe Harbor")

Regulation: 24 CFR §§ 5.609(c)(3) and 891.105; 891.410(b)-(c) and (g); and 891.610(b)-(c) and (g)

Summary: PHAs/MFH Owners may determine a family's annual income, including income from assets, prior to the application of any deductions based on income determinations made within the previous 12-month period, using income determinations from the following types of means-tested federal public assistance programs:

- The Temporary Assistance for Needy Families block grant (42 U.S.C. 601, et seq.).
- Medicaid (42 U.S.C. 1396 et seq.).
- The Supplemental Nutrition Assistance Program (42 U.S.C. 2011 et seq.).
- The Earned Income Tax Credit (26 U.S.C. 32).
- The Low Income Housing Tax Credit (26 U.S.C. 42).
- The Special Supplemental Nutrition Program for Woman, Infants, and Children (42 U.S.C. 1786).
- Supplemental Security Income (42 U.S.C. 1381 et seq.).
- Other programs administered by the Secretary.
- Other means-tested forms of federal public assistance for which HUD has established a memorandum of understanding.
- Other federal benefit determinations made by other means-tested federal programs that the Secretary determines to have comparable reliability and announces through a *Federal Register* notice.

If a PHA/MFH Owner elects to use the annual income determination from one of the above-listed forms of means-tested federal public assistance, then they must obtain the income information by means of a third-party verification. The third-party verification must state the family size, must be for the entire family (i.e., the family members listed in the documentation must match the family's composition in the assisted unit, except for household members), and must state the amount of the family's annual income. The annual income need not be broken down by family member or income type. Annual income includes income earned from assets, therefore when using Safe Harbor to verify a family's income, PHAs/MFH Owners will neither further inquire about a family's net family assets, nor about the income earned from those assets, except with respect to whether or not the family owns assets that exceed the asset limitation in 24 CFR § 5.618.

The Safe Harbor verification may be in the form of an award letter from the relevant federal program and must show that the family's income determination was made in the previous 12 months. **HUD clarifies in this notice that the verification will be considered acceptable if the documentation meets the criteria that the income determination was made within the 12 months prior to the receipt of the verification by the PHA/MFH Owner. This satisfies all verification date requirements for Safe Harbor income determinations.**

The Safe Harbor documentation will be considered acceptable if any of the following dates fall into the 12-month period prior to the receipt of the documentation by the PHA/MFH Owner:

- Income determination effective date;
- Program administrator's signature date;
- Family's signature date;
- Report effective date; or
- Other report-specific dates that verify the income determination date.

The only information that PHA/MFH Owners are permitted to use to determine income under this Safe Harbor is the total income determination made by the federal means-test program administrator. Other federal programs may provide additional information about income inclusions and exclusions in their award letters; however, these determinations and any other information **must not** be considered by the PHA/MFH Owner for purposes of the HOTMA Safe Harbor provision. PHAs/MFH Owners are not permitted to mix and match Safe Harbor income determinations and other income verifications.

The amounts of unreimbursed reasonable attendant care expenses and child-care expenses deducted from a family's annual income, except for when a family is approved for a child-care expense hardship exemption, must still be capped by the amount earned by any family member who is enabled to work as a result of the expense. PHAs/MFH Owners are therefore required to obtain third-party verification of the applicable employment income and cap the respective expense deductions accordingly.

It is anticipated that in many cases tenants will provide the PHA/MFH Owner with the Safe Harbor third-party verification for the purpose of reexamination, rather than the PHA/MFH Owner mailing a verification form to the third party to complete. If the PHA/MFH Owner does not accept Safe Harbor documentation, is unable to obtain Safe Harbor documentation, or if the family disputes the other program's income determination, the PHA/MFH Owner must calculate the family's annual income using the methods established in § 5.609(c)(1) and (2).

If the PHA/MFH Owner uses a Safe Harbor determination to determine the family's income for an income examination (New Admission/Move Ins, Initial Certification for MFH programs only, Interim Reexamination, or Annual Reexamination), then the family is obligated to report changes in income that meet the reporting requirement and occur after the effective date of the PHA/MFH Owner's transaction. This might mean that a certain source of income was not considered in the family's income, because the other program does not consider the source to be income. For example, if the family begins receiving a new source of income on 2/1/2024 and the PHA/MFH Owner completed an annual reexamination effective 3/1/2024 using a Safe Harbor income determination, then the family does not need to report that change in income. If the family has a change in adjusted income in accordance with HUD's rules that occurs after 3/1/2024, when the Annual Reexamination was effective, then the family must report the change to the PHA/MFH Owner.

Example J1: Acceptable Verification of Safe Harbor

<u>Background:</u> A PHA/MFH Owner decides to implement the Safe Harbor provision, and their policy states that they will accept income determinations from the Supplemental Nutrition Assistance Program (SNAP). At the Smith family's annual reexamination interview, the Smiths provide the reexamination specialist an original print-out from the agency that administers SNAP benefits. The printout reflects the Smith's correct family size of 4, and current household composition, and it states the total amount of the family's earned income. The annual income is $19,500 ($812.50 x 24 semi-monthly pay periods). The print-out was dated 30 days prior to the PHA/MFH Owner's request, and the income was determined six months ago.

<u>SNAP Budget Calculation (from State Department of Social Services)</u>

Report Date: 05/17/2024

Head of Household: Smith, Hunter

Home Address: 123 Main Street, USA

Household members:

Last Name	First Name	Date of Birth	Relationship
Smith	Hunter	01/01/1974	Head of Household
Smith	Annabelle	06/18/1976	Spouse
Smith	Lola	05/17/2019	Daughter
Smith	Eric	05/17/2019	Son

<u>Budget Calculation</u>

Monthly Earned Income: $1,625

Total Unearned Income: $0

Standard Deduction: $112.50

Monthly child care/dependent care: $50

Allowable medical deductions: $0

Result: The PHA/MFH Owner may use this printout to determine the Smith's annual income for their annual reexamination. The PHA/MFH Owner lists $19,500 as the annual income for the family's reexamination ($1,625 monthly earned income + $0 unearned income x 12 months). The PHA/MFH Owner **does not** need to take any additional steps to verify or calculate gross annual income, including comparing the income determination to EIV data. The PHA would then verify and apply applicable deductions to calculate the family's annual adjusted income.

PHA/MFH Owner Discretion: PHAs/MFH Owners are not required to accept or use determinations of income from other federal means-tested forms of assistance.

PHAs/MFH Owners must establish in policy whether and when they will accept Safe Harbor income determinations (e.g., at reexamination only or at admission and reexamination), including which programs from which they will accept income determinations. PHAs/MFH Owners must also create policies that outline the course of action when families present multiple verifications from the same or different acceptable Safe Harbor programs (e.g., to accept the most recent income determination). These policies must be included in the PHA's/MFH Owner's ACOP, Administrative Plan, or Tenant Selection Plan, as applicable.

J.5 Verification Hierarchy

Regulation: 24 CFR §§ 5.240(c); 5.659(d); 891.105; 891.410(b)-(c) and (g); 891.610(b)-(c) and (g); 960.259(c); 982.201(e); and 982.516(a)(2)

Summary: PHAs/MFH Owners are responsible for obtaining third-party verification of reported family annual income, the value of assets, expenses related to deductions from annual income, and other factors that affect the determination of adjusted income. Third-party verification is a process by which PHAs/MFH Owners gather information (e.g., about the family's annual income, value of assets, etc.) independently from the source of the income, assets, expenses, or other factors that affect the determination of adjusted income. Third-party verification may be obtained directly from the third party or through the family. PHAs/MFH Owners must document in the tenant file the reason why third-party verification was not available unless HUD's regulations specifically permit families to self-certify a particular component of adjusted income.

HUD developed a hierarchy (see table J2, below) that describes verification documentation from most acceptable to least acceptable. The PHA/MFH Owner must demonstrate efforts to obtain third party verification prior to accepting self-certification except instances when self-certification is explicitly allowed (e.g., net family assets that do not exceed $50,000).

A description of each verification technique and additional guidance follows Table J2.

Table J2: Verification Hierarchy

Level	Verification Technique	Ranking/Order of Acceptability
6	Upfront Income Verification (UIV), using HUD's Enterprise Income Verification (EIV) system	Highest PHAs/MFH Owners must pull the EIV Income Report for each family at every Annual Reexamination, unless using Safe Harbor documentation to verify the family's income

		EIV may be used as the sole verification of Social Security income. EIV income information may be used to calculate other types of annual income when family agrees. See Level 4 for more information.
5	Upfront Income Verification (UIV) using non-EIV system (e.g., The Work Number, web-based state benefits systems, etc.)	Highest
4	Written, third-party verification from the source, also known as "tenant-provided verification" OR EIV + Self-Certification PHAs/MFH Owners can choose either option when both are available to verify income. PHAs/MFH Owners must use written, third-party verification when the income type is not available in EIV (e.g., self-employment, Go Fund Me accounts, general public assistance, Veterans Administration benefits, etc.)	High • Written, third-party verification is used when tenant disputes EIV-reported employment and income information. • The EIV Income Report may be used to verify and calculate income if the family self-certifies that the amount is accurate and representative of current income. The family must be provided with the information from EIV.
3	Written, Third-Party Verification Form	Medium • Use if Level 5 or Level 4 verification is not available or is rejected by the PHA/MFH Owner and when the applicant or tenant is unable to provide acceptable documentation. • May substitute Level 2 for written, third-party verification form, only completing one of the two forms of verification before moving to self-certification.
2	Oral Third-Party Verification	Medium
1	Self-Certification (not third-party verification)	Low • Use as a last resort when unable to obtain any type of third-party verification or if specifically permitted, such as to determine actual income from assets when the family certifies that net family assets do not exceed $50,000. • May be used as highest form of verification when the family reports zero income.

J.5.a Third-Party Verification Descriptions and Guidance

- **Upfront Income Verification (UIV) (Level 6/5):** The verification of income before or during a family reexamination, through an independent source that systematically and uniformly maintains income information in computerized form for a number of individuals. It should be noted that the EIV system is available to all PHAs/MFH Owners as a UIV technique and that all

PHAs/MFH Owners are required to use EIV in its entirety (see paragraph J.3 on Mandated and Discretionary Use of EIV). PHAs/MFH Owners are encouraged to continue using other non-HUD UIV tools, such as The Work Number (an automated verification system) and state government databases, to verify tenant-reported income.

- **Written, Third-Party Verification (Level 4):** An original or authentic document generated by a third-party source dated within 120 days of the date received by the PHA/MFH Owner. For fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation.

  Such documentation may be in the possession of the tenant (or applicant) and is commonly referred to as tenant-provided documents. PHAs/MFH Owners may obtain any tenant-provided documents and follow up directly with the third-party source to obtain necessary verification of information, when necessary.

  Examples of acceptable tenant-provided documentation (generated by a third-party source) include but are not limited to the following: pay stubs, payroll summary report, employer notice/letter of hire/termination, SSA benefit verification letter, bank statements, child support payment stubs, welfare benefit letters and/or printouts, and unemployment monetary benefit notices.

  PHAs/MFH Owners are required to obtain a minimum of two current and consecutive pay stubs for determining projected annual income from wages when they are relying on pay stubs for Level 4 documentation. MFH Owners were previously required to collect the most recent four to six weeks of pay stubs to verify employment income. For new income sources or when two pay stubs are not available, the PHA/MFH Owner should determine income based on the information from a traditional written, third-party verification form or the best available information.

  Income tax returns with corresponding official tax forms and schedules attached and including third-party receipt of transmission for income tax return filed (i.e., tax preparer's transmittal receipt, summary of transmittal from online source, etc.) are an acceptable form of written, third-party verification.

  When verification of assets is required, PHAs/MFH Owners are required to obtain a minimum of one statement that reflects the current balance of banking/financial accounts. MFH Owners were previously required to average the balance of six checking account statements to determine the cash value of a checking account.

  EIV may be used as Level 4 verification and may be used to calculate income as long as the family agrees with the information in EIV; this practice is known as "EIV + Self-Certification." The PHA/MFH Owner may use their discretion to determine which method of calculation is reasonable: the last 4 quarters combined or an average of any number of quarters. The EIV Income report must be pulled within 120 days prior to the reexamination effective date.

- **Written, Third-Party Verification Form (Level 3):** This practice is also known as “traditional third-party verification.” This type of verification is a form developed by the PHA/MFH Owner and used uniformly for all families when needed to collect information from a third-party source. The form is completed by the third party by hand (in writing or typeset). PHAs/MFH Owners send the form directly to the third-party source by mail, fax, or email.

  The PHA/MFH Owner may skip this level of verification before attempting Level 2, which means they will have only completed Level 3 or Level 2 verification before moving to Self-Certification.

- **Oral Third-Party Verification (Level 2):** Independent verification of information by contacting the individual income/expense source(s), as identified through the UIV technique, or identified by the family, via telephone or in-person visit. PHA/MFH Owner staff must document in the tenant file the date and time of the telephone call (or visit to the third party) and the name of the person contacted and their telephone number, along with the confirmed information.

  This verification method is commonly used when the independent source does not respond to the PHA/MFH Owner’s faxed, mailed, or e-mailed request for information in a reasonable time frame (e.g., 10 business days).

  The PHA/MFH Owner may skip this level of verification if they attempted Level 3, which means they will have only completed Level 3 or Level 2 verification before moving to Self-Certification.

- **Non-Third-Party Verification Technique: Self-Certification (Level 1):** The tenant submits a signed statement of reported income and/or expenses to the PHA/MFH Owner. This verification method should be used as a last resort when the PHA/MFH Owner has not been successful in obtaining information via all other required verification techniques. When the PHA/MFH Owner relies on self-certification to verify income or expenses, the PHA/MFH Owner must document in the tenant file why third-party verification was not available.

  HUD does not require that a self-certification be notarized; however, HUD recommends including language on any self-certification to ensure the certifier understands the consequences of knowingly providing false information.

  Sample language to use in a self-certification: “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 5 years, fines, and civil and administrative penalties. (18 U.S.C. 287, 1001, 1010, 1012; 31 U.S.C. 3279, 3802)”

J.6 Verification of Social Security Number (SSN)

Regulation: 24 CFR § 5.216(g)(1) 891.105; 891.410(b)-(c) and (g); 891.610(b)-(c) and (g)

Summary: It has become increasingly difficult for applicants to meet HUD's SSN disclosure requirements, particularly for those individuals experiencing homelessness. To help protect individuals' privacy, many federal, state, and local agencies no longer print an individual's SSN on official documentation. Individuals may be required to visit their local Social Security office and provide original identity documentation in order to obtain a replacement Social Security card.

HUD is adjusting what the Department considers acceptable documentation of SSN under 24 CFR § 5.216(g)(1) to make it easier for applicants to access programs even if they do not have access to their Social Security card or other documentation acceptable to HUD. PHAs/MFH Owners must still attempt to gather third-party verification of SSN prior to admission; however, they will also have the option of accepting a self-certification and a third-party document with the applicant's name printed on it to satisfy the SSN disclosure requirement if the PHA/MFH has exhausted all other attempts to obtain the required documentation. HUD has provided similar flexibility to PHAs through the CARES Act waivers and for Emergency Housing Vouchers.

HUD prescribes, through this notice and in accordance with 24 CFR 5.216(g)(1)(iii), that the following evidence of SSN is acceptable only after the PHA/MFH Owner has attempted to first obtain a valid SSN card issued by the SSA or an original document issued by a federal or state government agency that contains the name of the individual and the SSN of the individual, along with other identifying information of the individual:

Self-certification of SSN *and* at least one third-party document, such as a bank statement, utility or cell phone bill, benefit letter, etc., that contains the name of the individual.

If verifying an individual's SSN using this method, the PHA/MFH Owner must document why the other SSN documentation was not available.

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

J.7 Verification of Excluded Income

To reduce administrative burdens on PHAs/MFH Owners, HUD is providing guidance and clarification on the requirements for verifying excluded income.

For income sources where the entire amount qualifies to be excluded from the annual income determination in accordance with 24 CFR § 5.609(b) and any *Federal Register* notice on mandatory exclusions issued by HUD, the PHA/MFH Owner **is not** required to:

- Verify the income using third-party verification;

- Document in the tenant file as to why the third-party verification was not available as required by 24 CFR §§ 5.659(d), 960.259(c)(i), and 24 CFR 982.516(a)(2); 891.105; 891.410(b)-(c) and (g); 891.610(b)-(c) and (g); or
- Report the income on forms HUD–50058/HUD–50059.

PHAs/MFH Owners may accept an applicant or participant's self-certification as verification of excluded income. The PHA/MFH Owner's application and reexamination questionnaire documentation may serve as the self-certification of excluded income. PHAs/MFH Owners have the option of verifying the income using third-party verification, if necessary, to determine if a source of income qualifies for exclusion.

Examples of excluded income categories that are verifiable through applicant or participant self-certification include:

- Supplemental Nutrition Assistance Program (SNAP) benefits, formerly known as food stamps.
- Income of a live-in aide. For a complete list of income exclusions, see 24 CFR § 5.609(b).

An income source that is partially excluded, for example, earnings in excess of $480 for full-time students 18 years of age or older (24 CFR § 5.609(b)(14)), must be third-party verified and reported on forms HUD–50058/HUD–50059.

J.8 Zero Income Procedures

PHAs/MFH Owners may accept a self-certification of zero income from the family at admission and at reexamination without taking any additional steps to verify zero reported income. HUD does not require that such self-certification be notarized. PHAs/MFH Owners are reminded that they must verify families' income in EIV within 120 days after admission, except where the PHA/MFH Owner used Safe Harbor documentation to verify a family's income.

PHAs/MFH Owners have discretion to establish reasonable procedures to manage the risk of unreported income, such as asking families to complete a zero income worksheet at admission or periodically after admission to determine if they have any sources of unreported income, or searching an upfront income verification source (see Level 5) for unreported income, such as a public benefits database to which the PHA/MFH Owner has access. These procedures are meant to avoid improper payments and the need for repayment agreements.

In calculating annual income from a zero income worksheet, PHAs/MFH Owners must not assign monetary value to non-monetary in-kind donations from a food bank or similar organization received by the family (24 CFR § 5.609(b)(24)(vi)). PHAs/MFH Owners perform an interim reexamination only due to an increase in the family's adjusted income (24 CFR §§ 5.657(c)(3); 882.515(b)(3); 891.410(g)(2); 891.610(g)(2); 960.257(b)(3); and 982.516(c)(3)).

PHAs/MFH Owners that establish zero income procedures must update their local discretionary policies, procedures, and forms to comply with the final rule requirements. For example, families who begin receiving income which does not trigger an interim reexamination should no longer be considered zero income even though the family's income is not reflected on the form HUD–50058/HUD–50059.

APPENDIX: SAMPLE NET FAMILY ASSET SELF-CERTIFICATION FORM

Self-Certification of Net Family Assets and Real Property

This form will help determine your eligibility for the program under the asset limitation. Your housing provider may also use this form to help determine your income from assets if your total net family assets do not exceed $50,000 (adjusted annually for inflation). Third-party verification is required when net family assets exceed $50,000, and every three years.

Real Property (for example: land, house, condominium, commercial building, etc.).

1. Do you or any member of your assisted family have an ownership interest in any real property?

   ☐ Yes ☐ No

   If the answer to question #1 is No, skip to question #6.

2. If yes, please check off if any of the following statements are true about the property:

   ____ The property does not meet the disability-related needs for all members of the family (for example, physical accessibility requirements, accessible common areas, disability-related need for additional bedrooms, or closeness to accessible transportation/medical facilities/other supportive services, etc.);

   ____ The property is not sufficient for the size of the family;

   ____ The property is located in an area that is a hardship (for instance, far from a family member's place of work or school);

   ____ The property is not safe to live in because of physical condition; or

   ____ The property is not a property where a family can live based on the State or local laws where the property is located.

   If you checked off any of the above statements, you will need to provide additional documentation to demonstrate that the statement is true.

3. If you did not check off any of the statements in question 2, do you or any member of your assisted family have the legal authority to sell the property?

   ☐ Yes ☐ No

4. There is an exemption from the limitation on assistance for families that have an ownership interest in real property for victims of domestic violence, dating violence, sexual assault, and stalking. If you or any member of the assisted family is a victim, you can claim

this exemption from the real property limitation. Please check this box if you think you may be eligible for this exemption.

☐ I believe I may be eligible for this exemption, and I would like more information from the PHA's VAWA Coordinator or Executive Director, or the MFH property's Owner/Agent. (If you do not understand this exemption or how to exercise your rights, you can speak to these individuals for more information.)

5. What is the estimated cash value of the property (market value minus mortgage/other loans and costs to sell. Enter $0 if market value of property is less than outstanding debt (i.e., mortgage is upside down/underwater)?

$

Other Assets (for example: accounts, luxury items that are not necessary)

6. How much income do you expect your family to earn from your total family assets in the next year? This includes interest, dividends, and other earnings, e.g., anything for which you receive Form 1099 tax documents. Actual income (interest, dividends, etc.) from excluded assets is included as income.

$

7. Do you or any member of your assisted family have other assets (including checking accounts, savings accounts, certificates of deposits (CDs), stocks, bonds, luxury items, recreational vehicles, etc.) that total more than $50,000 (adjusted annually for inflation)?

☐ Yes ☐ No

Assets to consider	Assets always excluded
• Checking and savings accounts • Stocks, bonds, mutual funds • Luxury items or items that are not necessary, e.g., recreational boat, vehicles not used for regular transportation • Assets disposed of for less than fair market value; for example, if you gave away a house to someone out outside of the assisted family within the past two years, the value of the house would be considered an asset (except as determined by certain divorce or separation settlements)	• Retirement accounts (e.g., IRAs, 401k, 403b) • Educational savings accounts (Section 529, Section 530, Coverdell ESA, etc.) • ABLE accounts • Non-revocable trusts • Necessary items of personal property (items essential for the maintenance, use, and occupancy of a home or necessary for employment, education, cultural expression, or health and wellness) • Federal tax refunds (must be subtracted from total net family assets)

I/We, the undersigned, certify that the information provided here is true and correct to the best of my knowledge and recollection. 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 5 years, fines, and civil and administrative penalties. (18 U.S.C. 287, 1001, 1010, 1012; 31 U.S.C. 3279, 3802)

____ ______________

Head of Household Signature Date

Section 6.0 (a) – PHA Plan Update – Plan Elements Revised

Item #1 – Eligibility Selection and Admissions Policies including Deconcentration and Wait List procedure

Wait List Re-Opening Projections for FY 2024

SLHA's wait list is a pool of applicants that have a need and demand for units by location. By analyzing trends of refusal and acceptance of unit offers, and the number of applicants by site, we can discern which developments are considered most and least desirable. Thus with this information we determine when to open and close our wait lists.

HUD AMP #	SLHA #	Development Name	Management Office Address	Re-opening Wait Lists Projections for FY 2024
AMP 000002	MO1-002	Clinton-Peabody	1401 LaSalle	**NO**
AMP 000010	MO1-010	James House	4310 St. Ferdinand	**YES**
AMP 000013B	MO1-013B	Euclid Plaza Apartments	5310 N. Euclid	**YES**
AMP 000017	MO1-017	West Pine	4490 West Pine	**YES**
AMP 000019	MO1-019	Parkview Apartments	4451 Forest Park	**YES**
AMP 000028	MO1-028	Badenhaus & Badenfest	8450 Gast Place	**YES**
AMP 000034	MO1-034	LaSalle Park	1001 Hickory	**NO**
AMP 000037	MO1-037	Cochran Plaza	1420 N 10^{th}	**YES**
AMP 000038	MO1-038	Armand & Ohio	2947,4951,4957 Armand	**NO***
AMP 000038	MO1-038	South Side Scattered Sites	3447 Lafayette	**YES**
AMP 000041	MO1-041	North Side Scattered Sites	1007 N. Taylor	**NO**
AMP 000044	MO1-044	Murphy Park I, II & III	1920 Cass	**NO**
AMP 000047	MO1-047	King Louis Square I & II	1524 South 13^{th} & 1129 Hickory	**NO**
AMP 000048	MO1-048	Les Chateaux	1330 Chouteau	**YES**
AMP 000050	MO1-050	Renaissance Place at Grand I, II & III	1001 N. Compton	**NO**
AMP 000052	MO1-052	King Louis III	1001 Hickory	**YES**
AMP 000054	MO1-054	Sr. Living at Ren. Pl.	3217 Martin Luther King	**YES**
AMP 000055	MO1-055	Gardens at Ren. Pl.	3117 Thomas	**YES**
AMP 000056	MO1-056	Cahill House	1919 O'Fallon	**YES**
AMP 000058	MO1-058	Cambridge Heights I & II	703 O'Fallon	**NO**
AMP 000061	MO1-061	Kingsbury Terrace	5655 Kingsbury	**NO**
AMP 000062	MO1-062	Sr. Living at Cambridge Heights	728 Biddle	**YES**
AMP 000063	MO1-063	Arlington Grove	5547 Martin Luther King	**NO**
AMP 000064	MO1-064	North Sarah I, II & III	1024 North Sarah	**YES**
AMP 000067	MO1-067	Preservation Square I	1406 N 16^{th}	**YES**
		Section 8 Wait List	3520 Page Blvd.	**NO**

*After all current applicants on the Armand & Ohio wait list have been contacted and the list exhausted it will not be re-opened. Going forward it will be merged with the Southside Scattered Sites Waiting List.

ATTACHMENT #4

Section B.1 (c) – PHA Plan Update – Plan Elements Revised
Item 3 – Financial Resources

Financial Resources: Planned Sources and Uses		
Sources	**Planned $**	**Planned Uses**
1. Federal Grants (FFY 2024 grants)		
a) Public Housing Operating Fund	13,194,817	PHA Operations
b) Public Housing Capital Fund Grant	0	Capital Improvements
c) Housing Choice Voucher/VASH Program	51,530,094	Housing Assistance Payments and Administrative Fees
d) MS5-Mainstream 5 Voucher Program	286,468	Housing Assistance Payments
e) EHV-Emergency Housing Voucher	1,786,346	Housing Assistance Payments
f) Resident Opportunity and Self-Sufficiency Grants (ROSS)	157,378	FFS Coordinator for Public Housing & S8 Program
Other Federal Grants (list below)		
2. Prior Year Federal Grants (unobligated funds only) (list below)		***As of 3/31/24***
FFY 2017-MO36R00150217	898,605	Replacement Housing
FFY 2019-MO36P00150119	590,262	Capital Improvements
FFY 2020-MO36P00150120	525,101	Capital Improvements
FFY 2021-MO36P00150121	533,401	Capital Improvements
FFY 2022-MO36P00150122	3,633,340	Capital Improvements
FFY 2023-MO36P00150123	6,101,356	Capital Improvements
FFY 2023-MO36E00150123	250,000	Capital Improvements
FFY 2022-MO36H00150122	520,300	Capital Improvements
ROSS 2015-MO001DOJ017A015	5,159	Juvenile Reentry Assistance
ROSS 2023-ROSS231786	375,512	ROSS Service Coordinator
ROSS 2023-ROSS23MO5220	58,639	FSS Coordinator
3. Public Housing Dwelling Rental Income	2,680,100	PHA Operations
4. Other income (list below)		
Interest on Investments	2,025	PHA Operations
Interest on Investments/Fraud Recovery	0	Housing Assistance
Other (Dividends/Insurance Proceeds)	186,835	PHA Operations
Other (Charges to Residents)	238,895	PHA Operations
5. Non-federal sources (list below)		
Interest on Investments	75,000	
Other (Space Rentals)	86,269	
Total resources	**84,110,652**	

ATTACHMENT #5

Section B.1 (b) – Rent Determination

FY 2024 Flat Rent Comparables

PROPOSED FLAT RENT COMPARABLES FY 2024

80% FMR
Increase
No Increase
Decrease

Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	2024 Proposed Flat Rent
James House							
0 bdrm	$809	$986	$601	$614	$734	$742	$742
1 bdrm	$864	$1,058	$815	$758	$877	$778	$877
West Pine							
1 bdrm	$1,067	$1,238	$1,327	$1,617	$1,394	$778	$1,117
2 bdrm	$1,132	$1,906	$2,062	$1,597	$1,855	$967	$1,182
Parkview							
0 bdrm	$893	$994	$904	$943	$947	$742	$943
1 bdrm	$1,019	$1,376	$1,678	$1,665	$1,573	$778	$1,069
Kingsbury Terrace							
1 bdrm*	$524	$1,164	$1,338	$1,308	$1,270	$778	$568
2 bdrm*	$616	$1,702	$1,518	$1,561	$1,594	$967	$668
Euclid Plaza							
0 bdrm	$675	$1,010	$697	$1,561	$1,089	$742	$725
1 bdrm	$735	$982	$794	$706	$827	$778	$785
2 bdrm	$874	$932	$977	$927	$945	$967	$924
Badenfest							
1 bdrm	$614	$728	$873	$634	$745	$654	$664
2 bdrm	$773	$874	$932	$1,218	$1,008	$816	$823
Badenhaus							
0 bdrm	$653	$994	$559	$617	$723	$742	$703
1 bdrm	$646	$718	$743	$766	$742	$778	$778
Cochran Plaza							
2 bdrm twnhm	$1,009	$1,210	$781	$843	$945	$807	$1,059
3 bdrm twnhm	$1,119	$1,930	$885	$860	$1,225	$1,063	$1,169
4 bdrm twnhm	$1,178	$3,061	$1,570	$1,610	$2,080	$1,221	$1,228
5 bdrm twnhm	$1,314	$2,421	$1,595	$1,634	$1,883	$1,412	$1,364
6 bdrm twnhm	$1,457	$2,575	$2,890	$1,965	$2,477	$1,595	$1,507
LaSalle Park							
2 bdrm	$1,104	$1,466	$1,375	$1,209	$1,350	$807	$1,154
3 bdrm	$1,275	$1,974	$1,915	$1,790	$1,893	$1,063	$1,325
4 bdrm	$1,325	$2,070	$2,493	$2,043	$2,202	$1,221	$1,375
Clinton Peabody							
1 bdrm	$968	$1,190	$1,220	$1,163	$1,191	$645	$1,018
2 bdrm	$1,150	$1,178	$1,767	$1,195	$1,380	$807	$1,200
3 bdrm	$1,225	$1,435	$1,309	$2,150	$1,631	$1,063	$1,275
4 bdrm	$1,275	$1,870	$1,339	$1,295	$1,501	$1,221	$1,325
5 bdrm	$1,325	$1,993	$4,748	$2,290	$3,010	$1,412	$1,412
6 bdrm	-	$2,418	$5,679	$5,779	$4,625	$1,595	$1,595
Lafayette Apartments							
0 bdrm	$908	$1,001	$964	$809	$925	$742	$925
1 bdrm	$964	$1,397	$1,409	$1,316	$1,374	$778	$1,014
California Gardens							
0 bdrm	$636	$753	$578	$698	$676	$742	$742
1 bdrm	$697	$733	$722	$761	$739	$778	$778
Armand & Ohio							
3 bdrm	$1,112	$2,005	$2,098	$1,890	$1,998	$1,058	$1,162
5 bdrm twnhm	$1,325	$2,604	$2,888	$3,152	$2,881	$1,405	$1,405
Lafayette Town							
1 bdrm	$901	$1,107	$1,162	$933	$1,067	$667	$951
2 bdrm	$1,051	$1,472	$1,340	$1,195	$1,336	$834	$1,101
3 bdrm	$1,225	$1,875	$1,936	$1,954	$1,922	$1,097	$1,275
Tiffany Turnkey							
1 bdrm	$837	$892	$835	$788	$838	$667	$887
2 bdrm	$1,007	$1,185	$1,236	$1,252	$1,224	$834	$1,057
Folsom							
2 bdrm	$674	$1,340	$1,105	$1,216	$1,220	$834	$834
3 bdrm	$1,087	$1,460	$1,389	$1,194	$1,348	$1,097	$1,137
4 bdrm	$1,235	$2,095	$1,551	$1,279	$1,642	$1,265	$1,285

PROPOSED FLAT RENT COMPARABLES FY 2024

							80% FMR
							Increase
							No Increase
							Decrease
Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	2024 Proposed Flat Rent
Marie Fanger							
2 bdrm	$1,111	$1,720	$1,415	$1,580	$1,572	$834	$1,161
3 bdrm	$1,225	$1,551	$1,708	$1,499	$1,586	$1,097	$1,275
4 bdrm	$1,225	$1,576	$2,346	$3,249	$2,390	$1,265	$1,275
South Broadway							
3 bdrm	$1,100	$1,311	$1,656	$1,335	$1,434	$1,097	$1,150
McMillan Manor							
3 bdrm	$1,025	$2,063	$1,751	$2,338	$2,051	$1,063	$1,075
4 bdrm	$1,275	$2,056	$2,463	$2,101	$2,207	$1,221	$1,325
McMillan Manor II							
3 bdrm	$1,120	$1,905	$1,960	$1,935	$1,933	$1,058	$1,170
4 bdrm	$1,275	$1,493	$1,771	$1,636	$1,633	$1,215	$1,325
Samuel Shepard							
2 bdrm	$859	$900	$610	$823	$778	$834	$834
3 bdrm	$1,100	$1,808	$1,768	$1,772	$1,783	$1,097	$1,150
4 bdrm	$1,207	$1,230	$1,202	$1,080	$1,171	$1,265	$1,171
Page Manor							
3 bdrm	$895	$1,730	$1,325	$1,671	$1,575	$1,063	$1,063
4 bdrm	$1,040	$1,297	$1,235	$1,173	$1,235	$1,221	$1,090
Hodiamont							
2 bdrm	$784	$1,104	$947	$1,095	$1,049	$834	$834
3 bdrm	$918	$1,288	$1,455	$1,256	$1,333	$1,097	$1,097
4 bdrm	$1,151	$1,544	$1,172	$1,155	$1,290	$1,265	$1,201
Towne XV							
3 bdrm	$1,087	$1,585	$1,890	$1,015	$1,497	$1,069	$1,137
Cupples							
3 bdrm	$915	$1,077	$943	$1,015	$1,012	$1,097	$1,097
4 bdrm	$1,058	$1,366	$1,008	$1,265	$1,213	$1,265	$1,265
Walnut Park							
3 bdrm	$895	$1,055	$1,373	$1,272	$1,233	$1,063	$1,063
5 bdrm	$1,292	$2,346	$2,515	$2,439	$2,433	$1,412	$1,412
Lookaway							
3 bdrm	$1,095	$1,258	$1,210	$1,080	$1,183	$1,063	$1,145
4 bdrm	$1,133	$1,784	$1,510	$1,753	$1,682	$1,221	$1,221
King Louis Square III							
1 bdrm garden	$810	$909	$1,192	$920	$1,007	$675	$860
3 bdrm twnhm	$1,150	$2,230	$2,341	$1,989	$2,187	$1,071	$1,200
4 bdrm twnhm	$1,175	$2,101	$2,075	$2,558	$2,245	$1,227	$1,227
Murphy Park I							
2 bdrm garden*	$964	$1,251	$1,166	$898	$1,105	$834	$964
2 bdrm twnhm*	$964	$1,423	$1,250	$915	$1,196	$807	$964
3 bdrm garden*	$1,114	$1,701	$1,375	$1,370	$1,482	$1,097	$1,114
3 bdrm twnhm*	$1,114	$2,009	$1,024	$1,260	$1,431	$1,063	$1,114
4 bdrm twnhm*	$1,243	$3,000	$2,829	$2,787	$2,872	$1,221	$1,243
5 bdrm twnhm - PH**	$1,425	$2,543	$2,780	$1,765	$2,363	$1,412	$1,475
6 bdrm twnhm - PH**	$1,425	$2,717	$3,262	$3,290	$3,090	$1,595	$1,595
Murphy Park II							
2 bdrm garden*	$952	$1,251	$1,166	$898	$1,105	$834	$1,002
2 bdrm twnhm*	$952	$1,423	$1,250	$915	$1,196	$807	$1,002
3 bdrm garden*	$1,042	$1,701	$1,375	$1,370	$1,482	$1,097	$1,097
3 bdrm twnhm*	$955	$2,009	$1,024	$1,260	$1,431	$1,063	$1,063
4 bdrm twnhm*	$1,254	$3,000	$2,829	$2,787	$2,872	$1,221	$1,304
Murphy Park III							
2 bdrm garden*	$872	$1,251	$1,166	$898	$1,105	$834	$872
2 bdrm twnhm*	$880	$1,423	$1,250	$915	$1,196	$807	$880
3 bdrm garden*	$946	$1,701	$1,375	$1,370	$1,482	$1,097	$946
3 bdrm twnhm*	$946	$2,009	$1,024	$1,260	$1,431	$1,063	$946
4 bdrm twnhm - PH**	$1,322	$3,000	$2,829	$2,787	$2,872	$1,221	$1,372
5 bdrm twnhm - PH**	$1,465	$2,543	$2,780	$1,765	$2,363	$1,412	$1,515
6 bdrm twnhm - PH**	$1,481	$2,717	$3,262	$3,290	$3,090	$1,595	$1,595

PROPOSED FLAT RENT COMPARABLES FY 2024

							80% FMR
							Increase
							No Increase
							Decrease
Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	2024 Proposed Flat Rent
Renaissance Pl @ Grand							
1 bdrm garden*	$708	$1,006	$1,147	$1,027	$1,060	$667	$708
2 bdrm garden*	$849	$1,042	$1,225	$923	$1,063	$834	$849
2 bdrm twnhm*	$849	$1,470	$1,449	$1,382	$1,434	$807	$849
3 bdrm twnhm - PH**	$1,160	$2,062	$1,840	$2,163	$2,022	$1,063	$1,210
4 bdrm twnhm - PH**	$1,225	$2,471	$3,097	$1,610	$2,393	$1,221	$1,275
5 bdrm twnhm - PH**	$1,374	$2,475	$1,697	$1,658	$1,943	$1,412	$1,424
Renaissance Pl @ Grand II							
1 bdrm garden*	$708	$1,006	$1,147	$1,027	$1,060	$667	$708
2 bdrm garden*	$830	$1,042	$1,225	$923	$1,063	$834	$830
2 bdrm twnhm*	$830	$1,470	$1,449	$1,382	$1,434	$807	$830
3 bdrm twnhm*	$959	$2,062	$1,840	$2,163	$2,022	$1,063	$959
4 bdrm twnhm - PH**	$1,175	$2,471	$3,097	$1,610	$2,393	$1,221	$1,225
5 bdrm twnhm - PH**	$1,374	$2,475	$1,697	$1,658	$1,943	$1,412	$1,424
Renaissance Pl @ Grand III							
1 bdrm garden*	$658	$1,006	$1,147	$1,027	$1,060	$667	$658
2 bdrm garden*	$772	$1,042	$1,225	$923	$1,063	$834	$772
2 bdrm twnhm*	$823	$1,470	$1,449	$1,382	$1,434	$807	$823
3 bdrm twnhm*	$948	$2,062	$1,840	$2,163	$2,022	$1,063	$948
4 bdrm twnhm - PH**	$1,260	$2,471	$3,097	$1,610	$2,393	$1,221	$1,310
5 bdrm twnhm - PH**	$1,374	$2,475	$1,697	$1,658	$1,943	$1,412	$1,424
Gardens @ Renaissance							
1 bdrm garden*	$744	$1,035	$1,073	$1,048	$1,052	$778	$744
2 bdrm garden - PH**	$932	$1,023	$1,361	$1,410	$1,265	$967	$982
Senior Living @ Renaissnace							
1 bdrm garden*	$746	$1,136	$1,176	$1,119	$1,144	$778	$746
2 bdrm garden - PH**	$972	$1,023	$1,391	$1,391	$1,268	$967	$1,022
King Louis Square							
1 bdrm garden*	$531	$1,245	$931	$960	$1,045	$667	$531
2 bdrm grdn/twnhm*	$663	$1,649	$1,604	$1,533	$1,595	$807	$663
3 bdrm grdn/twnhm*	$777	$1,555	$1,287	$1,728	$1,523	$1,063	$777
4 bdrm twnhm - PH**	$1,158	$1,720	$2,430	$3,000	$2,383	$1,221	$1,208
King Louis Square II (Old Frenchtown)							
1 bdrm garden*	$572	$1,170	$1,165	$1,095	$1,143	$675	$572
2 brdm garden*	$704	$1,489	$1,348	$1,160	$1,332	$841	$704
3 bdrm twnhm*	$830	$1,975	$1,858	$2,024	$1,952	$1,071	$830
LesChateaux							
1 bdrm	$804	$1,335	$1,328	$1,223	$1,295	$778	$804
2 bdrm	$964	$1,369	$1,243	$1,396	$1,336	$967	$964
Cahill House							
1 bdrm garden*	$732	$850	$789	$775	$805	$778	$732
2 brdm garden - PH**	$867	$808	$1,355	$1,576	$1,246	$967	$967
Cambridge Heights I							
1 bdrm garden*	$583	$628	$710	$551	$630	$675	$583
2 brdm garden*	$715	$1,137	$835	$722	$898	$841	$715
2 bdrm twnhm*	$772	$1,270	$915	$960	$1,048	$816	$772
3 bdrm twnhm*	$910	$956	$981	$1,380	$1,106	$1,071	$910
4 bdrm twnhm - PH**	$1,274	$3,139	$1,648	$1,285	$2,024	$1,227	$1,324
5 bdrm twnhm - PH**	$1,290	$1,696	$1,735	$1,530	$1,654	$1,414	$1,414
Cambridge Heights II							
1 bdrm garden*	$606	$628	$710	$551	$630	$675	$606
2brdm garden*	$786	$1,137	$835	$722	$898	$841	$786
2 bdrm twnhm*	$812	$1,270	$915	$960	$1,048	$816	$812
3 bdrm twnhm*	$910	$956	$981	$1,380	$1,106	$1,071	$910
4 bdrm twnhm - PH**	$1,274	$3,139	$1,648	$1,285	$2,024	$1,227	$1,324
5 bdrm twnhm - PH**	$1,290	$1,696	$1,735	$1,530	$1,654	$1,414	$1,414
Cambridge Senior							
1 bdrm garden*	$667	$582	$681	$885	$716	$778	$667
2 brdm garden	$867	$920	$918	$1,009	$949	$967	$917

PROPOSED FLAT RENT COMPARABLES FY 2024

							80% FMR
							Increase
							No Increase
							Decrease
Development	Current Flat Rent	Comp. Rent	Comp. Rent	Comp. Rent	Average Comp. Rent	80% minus UA	2024 Proposed Flat Rent
Arlington Grove							
2 brdm twnhm*	$749	$1,185	$978	$1,115	$1,093	$803	$749
3 bdrm twnhm*	$856	$1,523	$1,378	$1,391	$1,431	$1,058	$856
North Sarah							
1 bdrm garden*	$640	$1,016	$1,068	$872	$985	$664	$640
2 brdm twnhm*	$749	$1,150	$1,150	$1,150	$1,150	$803	$749
3 bdrm twnhm*	$855	$1,238	$2,775	$1,530	$1,848	$1,058	$855
North Sarah II							
1 bdrm garden*	$600	$1,016	$1,068	$872	$985	$664	$600
2 brdm twnhm*	$700	$1,150	$1,150	$1,150	$1,150	$803	$700
3 bdrm twnhm*	$800	$1,238	$2,775	$1,530	$1,848	$1,058	$800
North Sarah III							
1 bdrm garden*	$600	$1,016	$1,068	$872	$985	$664	$600
2 brdm twnhm*	$700	$1,150	$1,150	$1,150	$1,150	$803	$700
3 bdrm twnhm*	$800	$1,238	$2,775	$1,530	$1,848	$1,058	$800
Preservation Square I							
2 bdrm garden*	$808	$1,597	$1,913	$1,097	$1,536	$816	$808
2 brdm twnhm*	$1,005	$1,253	$1,329	$1,479	$1,354	$841	$1,005
3 bdrm garden*	$1,019	$1,771	$1,720	$1,400	$1,630	$1,102	$1,019

* Tax Credit Max
** PH Unit, not Tax Credit

ATTACHMENT #6

Section B.1 (b) – PHA Plan Update – Plan Elements Revised

Item 5 – Operations and Management

Table of HUD Programs Under PHA Management

Program Name	Families Served at Fiscal Year Beginning 10/01/2023	Expected Turnover
Public Housing	2223	373
Section 8 Vouchers	5994	75
Section 8 Certificates	N/A	N/A
Section 8 Mod Rehab	N/A	N/A
Special Purpose Section 8 Certificates/Vouchers (list individually) **Veterans Affairs Supportive Housing Program (VASH)**	230	3
Public Housing Drug Elimination Program (PHDEP)	N/A	N/A
Other Federal Programs(list individually)	N/A	N/A

ATTACHMENT #7

Section B.1 (b) – PHA Plan Update – Plan Elements Revised

Item 7 – Homeownership

Homeownership Program information is located in Attachment #11-New Activities (page 4)

ATTACHMENT #8

Section B.1 (b) – Revisions of PHA Plan Elements

Item 8 - Community Service and Self-Sufficiency Programs:

The Authority's Admissions and Continued Occupancy Policy (ACOP) contain policies that comply with the requirements of community service and treatment of income changes resulting from welfare program requirements for public housing residents.

ROSS Service Coordinator Program Participation Year Ending (March 31, 2024)			
	Required Participants*	Enrolled Participants	Year Ending Totals
Service Coordinators	≥ last year's total	100	0 forfeitures 9 removals

FSS Program Participation Year Ending (March 31, 2024)			
	Required Participants*	Enrolled Participants	Year Ending Totals
Public Housing FSS	19	24 total 9 active	1 graduation 0 forfeitures
HCV - FSS	19	38 total 23 active	0 graduate 3 forfeitures

Average monthly escrow:	Public Housing- $252.26	HCV- $254.29
Average yearly escrow:	Public Housing- $10,958.43	HCV- $12,435.21

*Each quarter, the total number of new clients must be ≥ 5% of total participants (for ROSS Service Coordinators & FSS-PH **ONLY.** FSS-HCV has a HUD required amount; see above).

Below is a list of community partners working with the Resident Initiatives Department.

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/ specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
Education/Literacy Salvation Army Pathway of Hope	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Education/Literacy Ready Readers	Open to All	Referrals	Resident Initiatives Department FSS Coordinators	Public Housing and Housing Choice Voucher Residents
Education/Literacy Faith Brothers Financial Literacy	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Education/Literacy Busey Bank Financial Literacy	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Education/Literacy Navigate Schools	St. Louis City Students Early Ed- High School	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Education/Literacy Loyola Academy College Prep Enrichment High School Advocacy Academic Specialty Sports/Community Engagement	Male students 5th grade to 8th grade	Referrals/ Recruitment	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Education/Literacy St. Louis Community Credit Union	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Education/Literacy Better Family Life Community Engagement Food Resource Home Buying/Asset Development Career Assistance/Workforce Development Youth Mentoring/Programs	Open to All	Referrals	Via Referrals from Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Education/Literacy Contemporary Arts Museum STL Community Access/Engagement Workshops/Performances	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/ specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
Employment/Job Training Employment Connection Job Development and Placement Services, Employment Training	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Employment/Mentoring Job Corps Education and Job placement Career Development	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Employment/Job Training Slate Job Training and Placement Career Enhancement Summer Youth Jobs Programming	Open to All	Referrals	Resident Initiatives Department FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents
Employment/Job Training Urban League Employment Training	Open to All	Walk-Ins	Resident Initiatives Department Program	Public Housing and Housing Choice Voucher Residents
Employment/Job Training Employment Connections Career and Job Training/Workshops Rental Assistance Housing Security	Open to All	Referrals/ Appointments	Resident Initiatives Department Program	Public Housing and Housing Choice Voucher Residents
Family Life Skills Training and Youth Services Places for People Parenting Training and Interpersonal Skills Development	Referrals	Referrals	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
Family Life Skills Training and Youth Services POAH (Preservation of Affordable Housing) Resident Engagement Housing Education and Development	Referrals	Referrals	Resident Initiatives Department	Clinton Peabody Residents
Family Life Skills Training Father and Family Support Employment, Mentoring, Youth, Family Support, Re-Entry	Open to All	Referrals	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
Health and Wellness Services Affinia Healthcare Community Healthcare Services	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators Service Coordinators	Public Housing Elderly/Disabled & Family Residents

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/ specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
Health and Wellness Services Archwell Elderly and Disabled Health Care Services	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators Service Coordinators	Public Housing Elderly/Disabled & Family Residents Housing Choice Voucher Residents
Health and Wellness Services Alive and Well Trauma Training Racial Equity Self-Care Workshops/Training Wellness Educators	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services & FSS Coordinators Service Coordinators	Public Housing Elderly/Disabled & Family Residents Housing Choice Voucher Residents
Health and Wellness Services Power 4 STL/The Bric Dr. Punch Harm Reduction/ Overdose Prevention/ Mental Well-Being	Open to All	Referrals	Resident Initiatives Department Program	Public Housing and Housing Choice Voucher Residents
Health and Wellness Services Integrated Health Network Health Equity	Open to All	Referrals	Resident Initiatives Department Program	Public Housing and Housing Choice Voucher Residents
Health and Wellness Services St. Louis Community Health Workers Coalition Contacts to Agencies/Health and Wellness Services	Open to All	Referrals	Resident Initiatives Department Program	Public Housing and Housing Choice Voucher Residents
Health and Wellness Services Family Care Centers Health Services/Clinics North and South City WIC Services	Open to All	Referrals/ Appointments	Via referrals FSS Coordinators Service Coordinators	Public Housing and Housing Choice Voucher Residents, Elderly and Disabled
Health and Wellness Services Urban Harvest STL Farming, Self Sufficiency, Apprenticeships/Workshops	Open to All	Referrals	Resident Initiatives Department Program	Public Housing Elderly/Disabled Residents & Family Residents
Health and Wellness Services HERU Urban Farming Volunteering Field Trips Food Education Self-Sufficiency Farming	Open to All	Referrals	Via referrals FSS Coordinators Service Coordinators	Public Housing, Housing Choice Voucher Elderly/Disabled Residents
Health and Wellness Services St. Louis Area Agency on Aging Meals on Wheels	Open to All Elderly/ Disabled Residents	Referrals	Via referrals Coordinator Elderly/Disabled Services	Public Housing Elderly/Disabled Residents

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/ specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
Health and Wellness Services Lifewise Life Coaching All Ages Early Childhood Center Summer Camps Youth Work	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services	Public Housing Elderly/Disabled Residents
Health and Wellness Services West Side Missionary Baptist Church (4675 Page) Drive Thru Food Bank	Open to All	No ID Needed Food must be Picked Up	Referrals from Resident Initiatives or Self-Refer	Public Housing Residents Housing Choice Voucher Residents
Health and Wellness Services Love In Action Medicare/Medicare Educational Services	Open to All	Referrals	Via referrals Coordinator Elderly/Disabled Services	Public Housing Elderly/Disabled Residents & Family Residents
Youth Services St. Louis Area Violence Prevention Commission Youth Engagement & Safety Committee	Open to Ages (5-18)	Specific Criteria	Resident Initiatives Department Al Chappelle Community Center	Public Housing Residents Housing Choice Voucher Residents
Youth Services STAR- Early Childhood/Childcare	Open to Ages Birth to 5yrs.	Referrals	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
Youth Services Youth and Family Cente**r** Open Gym, Weekly Health Clinic, Summer Camp, Case Management, Events Senior and Disabled Activities	Open to all Ages	Referrals, Walk Ins	Resident Initiatives Department Youth & Family Center	Public Housing and Housing Choice Voucher Elderly/Disabled Residents
Youth Services SLU School of Education Summer Camps/Program	Open to Ages (5-18)	Referrals	Resident Initiatives Department McMillan Manor Residents	Public Housing Residents
Youth Services The Sophia Project	Open to Female Participants Middle through High School	Referrals	Resident Initiatives Department	Public Housing and Housing Choice Residents
Youth Services Urban League Head Start Early Childhood Education	Open to Ages (6 weeks-5 years)	Referrals	Multiple Head Start Locations	Public Housing and Housing Choice Voucher Residents
Youth Services Youth and Family Center	Open to Ages (5-18)	Referrals	Resident Initiatives Department Youth & Family Center	Public Housing and Housing Choice Voucher Residents

Services and Programs				
Program Name & Description (including location, if appropriate)	Estimated Size	Allocation Method (waiting list/random selection/ specific criteria/other)	Access (development office / PHA main office / other provider name)	Eligibility (public housing or section 8 participants or both)
Youth Services Deaconess Center for Child Well-Being Advocacy Programs Focused on Youth	Open to All	Referrals Walk-Ins Recruitment	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
Youth Services Cultural Leadership/LEAD	6th Grade through College Youth/Young Adults	Referrals/ Recruitment	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
Youth Services Hope House STL Transitional Housing Childcare	Open to Families in Transition	Referrals	Resident Initiatives Department	Public Housing and Housing Choice Voucher Residents
Youth Services Lifewise Life Coaching All Ages Early Childhood Center Summer Camps Youth Work Academic Supports	Open to All	Referrals	Resident Initiatives Department Program	Public Housing and Housing Choice Voucher Residents

ATTACHMENT #9

Section B.1 (a) – PHA Plan Update – Plan Elements Revised

Item 11 – Asset Management
Long-Term Capital Needs and Strategies

The St. Louis Housing Authority (SLHA) has developed a long-term strategy for operating and maintaining Public Housing assets, which includes self-management of developments that are one hundred percent public housing and the use of third-party management companies to manage public housing units in mixed-finance developments. SLHA utilizes property assessments to prioritize development and modernization activities.

On October 1, 2023, SLHA assumed self-management of its traditional public housing portfolio. This change was made in part to address long-term performance issues under prior third-party management agents. SLHA created a new in-house property management department headed by the newly created Director of Property Management position. The department will focus on developing capacity to manage daily operations in the coming year. With support from other SLHA departments, Property Management will develop a new long-term strategy for operating and maintaining traditional Public Housing assets.

The Asset Management Department, through the Director of Operations, is responsible for the oversight and administration of SLHA's mixed-finance developments managed by third-party management agents. Asset Management monitors property performance and utilizes a monthly scorecard to track key indicators such as occupancy, recertifications, vacant unit turnaround time. In addition, Asset management holds regular, monthly meetings with each management agent to assess performance.

Asset Management will also monitor property performance for the traditional public housing developments and utilize a monthly scorecard to track key indicators such as occupancy, recertifications and vacant unit turnaround time. Property Management staff will hold regular, monthly meetings with key SLHA departments to coordinate activities.

To prioritize development and modernization activities, SLHA had a Physical Needs Assessment (PNA) and Energy Audit (EA) of its entire affordable housing portfolio completed in 2021. The purpose was two-fold: (1) to fully capture the conditions and needs of public housing units and buildings and (2) to serve as a tool when developing a portfolio plan and identifying strategic decisions regarding investments, including the use of Capital Funds, Rental Assistance Demonstration Program, among others.

The PNA and EA were both completed in February 2022 and are continuing to be used to realign the capital fund plan to address needs identified in a targeted manner over the next five years.

The Development and Modernization Department, which administers the Capital Fund Program, utilizes the PNA and EA to accomplish portfolio-wide capital improvement planning, including physical and management improvements. The Department is responsible for tracking progress and updating priorities to adjust for fluctuating program funding. Throughout the portfolio, modernization activities will continue to be undertaken to extend the useful life of building systems of all scales and sizes, including vertical transportation (elevators); mechanical, electrical, and plumbing system upgrades; targeted building exterior repairs and a comprehensive program of site repairs, improvements, and public safety.

SLHA will continue to pursue additional local, state and federal resources to assist with capital needs. In addition to the aforementioned capital fund planning, SLHA has received an asset repositioning strategy through a HUD funded consultant. This plan was approved by the SLHA Board of Commissioners in November 2023 and will guide the agency in executing the repositioning strategy for public housing units utilizing RAD and/or Section 18 applications.

ATTACHMENT #10

Section B.1 (c) – Deconcentration of Poverty and Income Mixing [24 CFR 903.1 and 903.2]

Deconcentration of poverty and income mixing is a policy that allows PHA's to bring higher income tenants into lower income developments and lower income tenants into higher income developments. In accordance with 24 CFR Part 903, a Deconcentration and Income Mixing Policy is required as a part of SLHA's Admissions and Continued Occupancy Policy (ACOP). SLHA's Deconcentration and Income Mixing Policy is included in Chapter 6 of the ACOP – Tenant Selection, Section 6.4.

Developments subject to the deconcentration of poverty and income mixing requirements are referred to as "covered" developments". Covered developments include general occupancy (or family) public housing developments.

Developments not subject to the requirement include public housing developments:

- with-fewer than 100 public housing units;
- designated specifically for elderly and/or disabled residents;
- approved for demolition or for conversion to tenant-based assistance; and
- approved mixed-finance developments using HOPE VI or public housing funds.

Table 2 - Average Income of Public Housing Developments includes a list of all SLHA developments, their annual income and if they are subject to the Deconcentration and Income Mixing Requirements.

SLHA will determine the average income of families in all covered developments on an annual basis. SLHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85 percent to 115 percent of the average family income. The results of SLHA's analysis are summarized on **Table 1 - Average Income of Families in All Covered Developments.**

If covered developments have an average income outside the EIR, SLHA will then determine whether or not these developments are consistent with its local goals and annual plan. If the development is not consistent with local goals and annual plan the SLHA may skip a family on the waiting list to reach another family in an effort that would further the goals of deconcentration.

Deconcentration of Poverty and Income Mixing
Table 1: Average Income of Familes in Covered Developments

Development Name	Average Income	Average Income ALL Developments	% of Income	Established Income Range (85% - 115%)
Clinton Peabody	$7,937	$12,287	65%	Below
James House	$8,406	$12,287	68%	Below
Euclid Plaza	$7,327	$12,287	60%	Below
Northside Scattered Sites	$11,216	$12,287	91%	Within
Parkview	$8,860	$12,287	72%	Below
Southside Scattered Sites	$10,076	$12,287	82%	Below
Badenhaus/Badenfest	$7,148	$12,287	58%	Below
LaSalle Park	$9,275	$12,287	75%	Below
Kingsbury Terrace	$11,645	$12,287	95%	Within
ALL Covered Developments	**$9,260**	**$12,287**	**75%**	-
ALL DEVELOPMENTS	**$12,287**	**$12,287**	**100%**	-

*As of December 31, 2023

Deconcentration of Poverty and Income Mixing
Table 2: Average Income of Public Housing Developments*

Dev. Number	Development Name		Count of Families	Average Income
020	Clinton-Peabody	Covered	135	$7,937
100	James House	Covered	110	$8,406
132	Euclid Plaza	Covered	105	$7,327
150	Towne XV (NSSS)	Covered	5	$7,240
160	McMillan Manor (NSSS)	Covered	16	$7,553
170	West Pine	< 100 Units	83	$10,373
190	Parkview	Covered	242	$8,860
220	Lafayette Apartments (SSSS)	Covered	19	$9,531
230	California Gardens (SSSS)	Covered	9	$8,655
260	Page Manor (NSSS)	Covered	6	$4,077
280	Badenhaus Elderly (BH/BF)	Covered	86	$5,909
340	LaSalle Park	Covered	126	$9,275
350	Armand & Ohio (SSSS)	Covered	2	$4,056
370	Cochran Plaza	<100 Units	65	$12,712
380	Folsom (SSSS)	Covered	3	$4,240
381	Samuel Shepard (NSSS)	Covered	10	$8,947
382	Marie Fanger (SSSS)	Covered	3	$15,281
383	Cupples (NSSS)	Covered		
384	Hodiamont (NSSS)	Covered		
390	Badenfest Elderly (BH/BF)	Covered	19	$12,756
410	South Broadway (SSSS)	Covered	8	$16,985
411	Walnut Park (NSSS)	Covered	13	$15,025
412	Lookaway (NSSS)	Covered	12	$10,400
420	Lafayette Townhomes (SSSS)	Covered	14	$9,447
421	Tiffany Turnkey (SSSS)	Covered	12	$9,293
440	Murphy Park I	Mixed Finance/HOPE VI	73	$19,382
450	Murphy Park II	Mixed Finance/HOPE VI	56	$20,698
460	Murphy Park III	Mixed Finance/HOPE VI	57	$21,530
470	King Louis Square I	Mixed Finance/HOPE VI	35	$14,026
480	Les Chateau	Mixed Finance/HOPE VI	39	$15,933
490	King Louis Square II	Mixed Finance/HOPE VI	39	$17,799
500	Renaissance Place @ Grand I	Mixed Finance/HOPE VI	63	$23,244
510	McMillan Manor II (NSSS)	Covered	15	$18,167
520	King Louis Square III	Mixed Finance/HOPE VI	18	$13,481
540	Sr. Living @ Renaissance Place	Mixed Finance/HOPE VI	74	$13,019
550	Gardens at Renaissance Place	Mixed Finance/HOPE VI	21	$10,118
560	Cahill House	Mixed Finance/HOPE VI	86	$15,489
570	Renaissance Place @ Grand II	Mixed Finance/HOPE VI	33	$12,445
580	Cambridge Heights	Mixed Finance/HOPE VI	28	$17,609
590	Renaissance Place @ Grand III	Mixed Finance/HOPE VI	51	$14,649
600	Cambridge Heights II	Mixed Finance/HOPE VI	28	$19,631
620	Sr. Living @ Cambridge Heights	Mixed Finance/HOPE VI	75	$14,467
630	Arlington Grove	Mixed Finance/HOPE VI	66	$14,151
640	North Sarah	Mixed Finance/HOPE VI	56	$11,245
650	North Sarh II	Mixed Finance/HOPE VI	38	$10,373
660	North Sarah III	Mixed Finance/HOPE VI	36	$17,007
661	Kingsbury Terrace	Covered	112	$11,645
670	Preservation Square I	Mixed Finance/HOPE VI	18	$11,702
Grand Total			**2,220**	**$12,287**
All Covered Developments			**1,230**	**$9,260**

Combined Developments				
NSSS	Northside Scattered Sites	Covered	77	$11,216
SSSS	Southside Scattered Sites	Covered	70	$10,076
BH/BF	Badenhaus/Badenfest	Covered	105	$7,148

*As of December 31, 2023

ATTACHMENT #11

Section B.2 (b) – New Activities

Section B.2

Choice Neighborhood, Mixed-Finance, Modernization or Development, Demolitions and/or Disposition, Conversion of Public Housing. Homeownership programs and Project-Based Vouchers

Item	Program Description	Project Description	Development	Unit Count /Affected	Time Table for Submission
B.2 (a)	Choice Neighborhood	Clinton-Peabody Revitalization SLHA procured Preservation of Affordable Housing (POAH) in November 2022 as the Master Developer for the Clinton-Peabody redevelopment. Planning work completed for the redevelopment in FY2023 has indicated that a comprehensinsive funding mechanism like Choice is critical for the success of the redevelopment. SLHA will submit a competitive Choice Neighborhood grant application for Clinton-Peabody in the next funding round.	MO001000002	355 units Public Housing	Timeline for activity: Projected start date of activity: 03/2024. Projected end date of activity: 12/2033.

Section B.2

Choice Neighborhood, Mixed-Finance, Modernization or Development, Demolitions and/or Disposition, Conversion of Public Housing. Homeownership programs and Project-Based Vouchers

Item	Program Description	Project Description	Development	Unit Count /Affected	Time Table for Submission
B.2 (a)	Mixed-Finance	Clinton-Peabody Revitalization SLHA procured Preservation of Affordable Housing (POAH) in November 2022 as the Master Developer for the Clinton-Peabody redevelopment. Community Engagement POAH was required to produce a Community Engagement Plan (CEP) to outline their community outreach efforts. POAH began engaging the community in January 2023 and has held monthly in-person community engagement planning meetings since. Residents have informed the Master Plan and have made significant contributions to the final layout. This plan was finalized in September 2023. POAH has also produced a website for the Clinton-Peabody redevelopment, posted flyers, knocked on doors, and made significant engagement efforts.	MO001000002	355 units Public Housing	Timeline for activity: Projected start date of activity: 01/2022. Projected end date of activity: 12/2027.

Section B.2

Choice Neighborhood, Mixed-Finance, Modernization or Development, Demolitions and/or Disposition, Conversion of Public Housing. Homeownership programs and Project-Based Vouchers

Item	Program Description	Project Description	Development	Unit Count /Affected	Time Table for Submission
		Funding Opportunities POAH submitted a LIHTC application to the Missouri Housing Development Commission (MHDC) for the first phase of redevelopment in September 2023. MHDC did not issue a tax credit award to Clinton-Peabody during that round of funding. POAH will submit another application in the fall of 2024 using feedback received from MHDC to improve the application. SLHA will continue to pursue and support every reasonable funding source, including Choice Neighborhoods, available for the redevelopment of Clinton-Peabody.			
B.2 (a)	Mixed-Finance	Family Replacement VI Replacement Housing Factor FY 2015-2020 SLHA will use RHF funds to continue to support predevelopment work needed for the conversion of public housing units to Rental Assistance Demonstration (RAD).	MO001000020	355 units Public Housing	Timeline for activity: Start date of activity: 02/2022. Projected end date of activity: 10/2025.
B.2 (b)	Disposition	Vaughn Family - Warehouse Facility SLHA will submit a Section 18 application to HUD requesting disposition of the property to help realign the SLHA portfolio to support/or create housing opportunities.	MO001000006	0	Timeline for activity: Projected start date of activity: 10/2022. Projected end date of activity 09/2024.
B.2 (b)	Disposition	Euclid Plaza Vacant Land SLHA will submit a Section 18 application to HUD requesting disposition of the property to help realign the SLHA portfolio to create additional housing opportunities.	MO001000013	0	Timeline for activity: Projected start date of activity: 10/2022 Projected end date of activity 09/2024.

Section B.2

Choice Neighborhood, Mixed-Finance, Modernization or Development, Demolitions and/or Disposition, Conversion of Public Housing. Homeownership programs and Project-Based Vouchers

Item	Program Description	Project Description	Development	Unit Count /Affected	Time Table for Submission
B.2 (b)	Demolition/Disposition	Clinton-Peabody Revitalization The Physical Needs Assessment (PNA) finalized in 2022 shows a significant need for revitalization of the Clinton-Peabody Apartments development. The property will be revitalized through the use of a master developer, which may utilize demolition/disposition tools available through HUD.	MO001000002	355 units Public Housing	Timeline for activity: Projected start date of activity: 04/2022 Projected end date of activity 12/2027.
B.2 (b)	Demolition/Disposition	Hodiamont Disposition The PNA finalized in 2022 shows that the property would need $4.6 million in renovation over 10 years to bring it up to standard. SLHA began the process of collecting the information necessary to submit a Section 18 application in February 2022. This included seeking a capital needs assessment and performing a site specific HUD environmental review. The process will continue in 2024. The property will be demolished and/or sold to a responsible owner commited to furthering SLHAs mission.	MO001000041	22 units Public Housing	Timeline for activity: Technical assistance start date: 02/2022. Projected end date of activity 09/2024.
B.2 (b)	Disposition/Partial Disposition	Cambridge Heights Vacant Land SLHA will submit a Section 18 demo/dispo application to HUD for the property to request disposition from the ACC contract. SLHA may choose to lease the property for a use other than housing.	MO001000058/ MO001000060	17	Timeline for activity: Projected start date of activity: 10/2022 Projected end date of activity 09/2024.

Section B.2

Choice Neighborhood, Mixed-Finance, Modernization or Development, Demolitions and/or Disposition, Conversion of Public Housing. Homeownership programs and Project-Based Vouchers

Item	Program Description	Project Description	Development	Unit Count /Affected	Time Table for Submission
B.2 (b)	Disposition/Partial Disposition	Parkview Apartments - RAD/Section 18 Blend Conversion The SLHA Asset Repositioning Strategy approved on November 15, 2023 identifies Parkview Apartments as a Tier 1C property in need of repositioning. Predevelopment work on converting the property to RAD/Section 18 Blend (substantial rehab) or RAD will begin in 2024.	MO001000019	295	Timeline for activity: Start date of activity: 03/2024 Projected end date of activity 09/2027.
B.2 (b)	Partial Disposition	Lookaway Disposition The PNA finalized in 2022 show that these properties would need $3.1 million in capital improvements over 10 years. SLHA will consider submiting to HUD an application requesting the conversion of single-family PH units to affordable home ownership opportunities.	MO001000041	17	Timeline for activity: Projected start date of activity: 10/2023 Projected end date of activity 09/2024.
B.2 (c)	Designated Housing for Elderly and/or Disabled Families	Parkview Apartments - Convert from family to designated elderly housing. SLHA received approval from HUD for the conversion of Parkview Apartments to elderly only on April 19, 2023. The conversion process will begin in 2024.	MO001000019	295	Timeline for activity: Start date of activity: 10/2022 Projected end date of activity 09/2026.

Section B.2

Choice Neighborhood, Mixed-Finance, Modernization or Development, Demolitions and/or Disposition, Conversion of Public Housing. Homeownership programs and Project-Based Vouchers

Item	Program Description	Project Description	Development	Unit Count /Affected	Time Table for Submission
B.2 (d)	Conversion of Public Housing to Tenant-Based or to Project-Based under RAD Conversion.	In 2022, HUD provided technical assistance through a firm with expertise on its asset repositioning plans. A draft report was presented to the SLHA Board of Commissioners at the January 2023 board meeting. The Asset Repositioning Strategy was approved by the Board of Commissioners on November 15, 2023 and will be used to guide future decisions on submitting RAD applications.	TO BE DETERMINED	TO BE DETERMINED	Timeline for activity: Projected start date of activity: 01/2022. Projected end date of activity: Ongoing.
B.2 (d)	Conversion of Public Housing to tenant-based or to project-based under RAD conversion.	Parkview Apartments - RAD Conversion The SLHA Asset Repositioning Strategy approved on November 15, 2023 identifies Parkview Apartments as a Tier 1C property in need of repositioning. Predevelopment work on converting the property to RAD/Section 18 Blend (substantial rehab) or RAD will begin in 2024.	MO001000019	295	Timeline for activity: Start date of activity: 03/2024 Projected end date of activity 09/2027.
B.2 (e)	Homeownership	Near South Side LA Saison Construction of 10 single-family homes in two Phases. Conversion of 10 lots to homeownership opportunities.		10	Vacant Lots: Actual start date of activity: 5/31/2016. Phase I - 5 homes constructed. Four of the 5 homes sold in 2022, the final home to be sold in 2023. Phase II - Expected to begin in 2023. The projected end date for activity: 12/31/2025.
B.2 (e)	Homeownership	Section 8 - Bridge to Homeownership Program		30	
B.2 (f)	Mainstream Voucher program	SLHA receives vouchers from HUD to assist near elderly and/or disabled families.			**Allocated** 87 **Leased** 26
B.2 (f)	Special Purpose: Housing Choice Voucher Program (VASH) voucher	SLHA continues to receive referrals from the Veteran's Administration for a Special-purpose voucher program under the Veterans Affairs Supportive Housing (VASH) program.			**Allocated** 253 **Leased** 245

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Choice Neighborhood, Mixed-Finance, Modernization or Development, Demolitions and/or Disposition, Conversion of Public Housing. Homeownership programs and Project-Based Vouchers

Item	Program Description	Project Description	Development	Unit Count /Affected	Time Table for Submission	
B.2 (f)	Special Purpose: Emergency Housing Voucher	SLHA receives vouchers from HUD in order to assist individuals and families that are homeless or at risk of being homeless, fleeing, or attempting to flee, domestic violence.			**Allocated** 161	**Leased** 150
B.2 (f)	Project-Based Vouchers	SLHA has 517 Project-based units. SLHA will be issuing an RFP to increase the number of project-based vouchers in SLHA's Housing Choice Voucher program.	Approved:	23rd Street Elderly, L.P.		74
				25th Street Elderly, L.P.		65
				Blumeyer Elderly, L.P.		30
				Blumeyer II Associates		8
				Cambridge Seniors, L.P.		36
				Carr Square Tenant Corp.		77
				FP-San Remo Develop., L.P.		0
				Grand South Senior, L.P.		81
				Hammond Apartments, L.P.		28
				Homer G. Phillips, Hist		48
				JVL Renaissance I, L.P.		0
				JVL Renaissance II, L.P.		0
				K-M Housing, L.P.		0
				Railton Residence, L.P.		22
				Salvation Army STL Garrison Residence, L.P. (VASH)		18
				Salvation Army STL Garrison Residence, L.P.		3
				Vaughn Elderly, L.P.		26
				Water Tower Place, L.P.		1
				Total:		517
B.2 (f)	Special Purpose: Tenant Protection Voucher (TPV) program	SLHA receives Tenant Protection Vouchers (TPV) from HUD for special purposes				**Leased** 138

Section B.2

Choice Neighborhood, Mixed-Finance, Modernization or Development, Demolitions and/or Disposition, Conversion of Public Housing. Homeownership programs and Project-Based Vouchers

Item	Program Description	Project Description	Development	Unit Count /Affected	Time Table for Submission
B.2 (g)	Emergency Safety and Security Application	SLHA continues to apply for funds to address crime and drug-related activities that pose an increased threat to health and safety of residents. SLHA will continue submit a health and safety grant for safety improvements at developments throughout the SLHA portfolio.	MO001000099	PHA Wide	Emergency safety and security application submission anticipated 03/27/24. Timeline for activity: Projected start date of activity: 10/01/2024. Projected end date of activity: 09/30/2025.
B.2 (g)	Housing Related Hazards Capital Fund and Lead-Based Paint Capital Fund Grant	SLHA continues to apply for funds to address hazzards that may linger in its housing developments including reducing potentials for carbon monoxide poisoning through the application of electric appliances and ventilation fans. SLHA will submit a Housing Related Hazzards Capital Fund grant for PHA Wide units.	MO001000099	PHA Wide	Housing Related Hazards Capital Fund and Lead-Based Paint Capital Fund Grant application anticipated to be submitted in April 2024. Timeline for activity: Actual start date of activity: 10/01/2024. Projected end date of activity: 09/30/2026.

ATTACHMENT # 12

Section B.2 (b) – New Activities

Item 11 – Units with Approved Vacancies for Modernization

Cambridge Heights, AMP MO001000058, will undergo modernization for 11 units at Cambridge Heights, the St. Louis Housing Authority (SLHA) has obtained HUD approval for 11 units to be placed into modernization status in IMS/PIC system.

Cambridge Heights II, AMP MO001000060, will undergo modernization for 7 units at Cambridge Heights II, the St. Louis Housing Authority (SLHA) has obtained HUD approval for 7 units to be placed into modernization status in IMS/PIC system.

Clinton-Peabody, AMP MO001000002, in anticipation of the redevelopment of Clinton-Peabody, the St. Louis Housing Authority (SLHA) has obtained HUD approval for 163 units to be placed into modernization status in IMS/PIC system.

Cochran, AMP MO001000037, will undergo comprehensive modernization of 4 units for heavy repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 4 units to be placed into modernization status in IMS/PIC system.

King Louis III, AMP MO001000052, will undergo comprehensive modernization of 1 unit for water damage repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 1 unit to be placed into modernization status in IMS/PIC system.

Murphy Park, AMP MO001000044, will undergo comprehensive modernization of 12 units for heavy repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 12 units to be placed into modernization status in IMS/PIC system.

Murphy Park II, AMP MO001000045, will undergo comprehensive modernization of 2 units for heavy repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 2 units to be placed into modernization status in IMS/PIC system.

Murphy Park III, AMP MO001000046, will undergo comprehensive modernization of 1 unit for heavy repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 1 unit to be placed into modernization status in IMS/PIC system.

NSSS - Cupples, AMP MO001000041 will undergo comprehensive modernization of 2 units. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 2 units to be placed into modernization status in IMS/PIC system.

NSSS - Hodiamont, AMP MO001000041, will undergo an asset repositioning strategy for the property. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 22 units to be placed into modernization status in IMS/PIC system.

NSSS - Lookaway, AMP MO001000041, will undergo comprehensive modernization of 3 units for heavy repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 3 units to be placed into modernization status in IMS/PIC system.

NSSS – McMillan Manor I & II, AMP MO001000041, will undergo comprehensive modernization of 2 units for necessary age-related major repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 2 units to be placed into modernization status in IMS/PIC system.

NSSS - Samuel Shepard, AMP MO001000041, will undergo comprehensive modernization of 3 units for fire damage (1) and water / mold damage (2) repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 3 units to be placed into modernization status in IMS/PIC system.

NSSS – Page Manor, AMP MO001000041, will undergo comprehensive modernization of 4 units for necessary age-related major repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 4 units to be placed into modernization status in IMS/PIC system.

Parkview Apartments, AMP MO001000019, will undergo comprehensive modernization of 26 units for heavy repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 26 units to be placed into modernization status in IMS/PIC system.

SSSS – California Gardens, AMP MO001000038, will undergo comprehensive modernization of 10 units for structural repairs and associated unit interior repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 10 units to be placed into modernization status in IMS/PIC system.

SSSS – Folsom, AMP MO001000038, will undergo comprehensive modernization of 1 unit for necessary age-related major repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 1 unit to be placed into modernization status in IMS/PIC system.

SSSS - Lafayette Townhomes, AMP MO001000038, will undergo comprehensive modernization of 12 units for heavy repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 12 units to be placed into modernization status in IMS/PIC system.

Renaissance Place @ Grand II, AMP MO001000050, will undergo comprehensive modernization of 1 unit for heavy repairs. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 1 unit to be placed into modernization status in IMS/PIC system.

Kingsbury AMP MO001000061, will undergo heavy repairs of 1 unit due catastrophic fire. The St. Louis Housing Authority (SLHA) has obtained HUD approval for 1 unit to be placed into Casualty Loss status in IMS/PIC system

ATTACHMENT #13

Section B.3 – Progress Report

Status of Goals and Objectives

The St. Louis Housing Authority (SLHA) revised its Five-Year Strategic Plan in 2020. In 2018, the leadership of SLHA determined that the strategic plan developed in 2013 was out of date and needed to be revised. To accomplish the task, in 2019, SLHA retained the Bronner Group to facilitate the creation of the Strategic Plan (Plan). Development of the Plan included two public meetings, two staff/board retreats, interviews with staff and stakeholders and over 700 survey responses. The new Plan was approved by the Board of Commissioners by Resolution No. 2903 at its February 2020 meeting.

The Plan establishes the strategic focus that will drive SLHA to deliver quality housing and services to its community. SLHA designed the Five-Year Strategic Plan to coincide with the City of St. Louis' 2020-2025 Consolidated Plan. This will allow for greater collaboration, communication and streamlining of housing strategies for the St. Louis region.

Thereafter, SLHA implemented a tracking system (Goal Tracker) to establish the milestones for the goals and objectives of the Plan. By this time, SLHA's focus on priorities drastically changed due to the Covid-19 Pandemic. SLHA engaged in activities to respond to the pandemic by implementing measures to protect residents, clients and staff. SLHA staff was engaged in numerous activities to change policies, increase awareness, purchase personal protective equipment, supplies and services for all developments and offices. In addition, SLHA hired contractors to install new safety measures for adopting social distancing and protection against infection or transmission.

Due to the pandemic, SLHA delayed the implementation of its Strategic Plan goals and objectives until operations started to stabilize. As such, the Plan was extended for an additional year (2020-2025) by vote of the Board of Commissioners via Resolution No. 2999 at its February 2024 meeting. The Plan has been updated with new milestones and progress of activities.

SLHA remains dedicated to its mission of providing quality housing and services. The revised Five-Year Strategic Plan serves as a roadmap to achieve this goal, fostering collaboration and ensuring a focus on residents' needs in the post-pandemic environment.

St. Louis Housing Authority
2020 - 2025 Strategic Plan Goal Tracker

	Level	Goal/Objective/Action	Responsible Unit/ Person	Target Start Date	Target End Date	Percent Complete	Status
1	Goal	Support safe and secure environments for SLHA's residents and staff				28%	
1.1	STR	Develop Standardized Safety Plan for all properties and sites	Asset Management & Property Management	October 1, 2021	December 31, 2025	0%	
1.1.1	ACT	Assess current safety practices and informal safety plans at developments	Asset Management & Property Management	October 1, 2021	June 30, 2025	0%	Not Started
1.1.2	ACT	Review existing policies regarding access to SLHA properties and update as needed; develop a formal plan if unavailable	Asset Management & Property Management	October 1, 2021	June 30, 2025	0%	Not Started
1.1.3	ACT	With assistance of the property management companies, draft and implement a standardized safety plan using a Trauma Informed lens	Asset Management & Property Management	October 1, 2021	June 30, 2025	0%	Not Started
1.1.4	1.1.5	Create and utilize a checklist to use to monitor property management companies to ensure adherence to safety plans and the maintenance of a safe and secure property	Asset Management	October 1, 2021	June 30, 2025	0%	Not Started
1.1.5	ACT	With assistance of property management companies, create emergency management plans for each development, creating signage of evacuation plans if unavailable	Asset Management & Property Management	October 1, 2021	June 30, 2025	0%	Not Started
1.1.6	ACT	Conduct preparedness exercises at all public housing developments (Active shooter, fire, earthquake, tornado, etc)	Asset Management & Property Management	October 1, 2021	June 30, 2025	0%	Not started
1.2	STR	Work collaboratively with residents, neighbors and the Police Department to foster safe and secure environments	Asset Management & Property Management	May 1, 2021	December 31, 2025	15%	
1.2.1	ACT	On a quarterly basis, request police department to attend resident meetings	Asset Management & Property Management	July 1, 2021	December 31, 2025	20%	On-going
1.2.2	ACT	Annually, request that the Fire Department attend resident meetings to address fire safety	Asset Management & Property Management	July 1, 2021	December 31, 2025	0%	Not started
1.2.3	ACT	With the assistance of the SLMPD, implement a strategy for community policing in public housing	Executive	May 1, 2021	December 31, 2025	30%	On-going
1.2.4	ACT	Annually, attend neighborhood meetings in neighborhoods with 50+ public housing units to foster relationships	Asset Management & Property Management	July 1, 2021	December 31, 2025	10%	Underway
1.3	STR	Identify and address environmental hazards to promote healthy homes	Asset Management, Property Management & HCV	January 1, 2020	December 31, 2024	63%	
1.3.1	ACT	Monitor property management companies to ensure that annual inspections occur in a timely manner and that issues identified are addressed	Asset Management & Property Management	January 1, 2021	December 31, 2024	70%	On-going
1.3.2	ACT	Request copies of Pre-REAC inspections completed by property management companies and monitor for health and safety deficiencies; follow up as needed	Asset Management & Property Management	January 1, 2021	December 31, 2024	80%	On-going
1.3.3	ACT	Create checklist to use and spot check public housing inspections to ensure timely and proper completion	Asset Management & Property Management	January 1, 2021	December 31, 2024	30%	Underway
1.3.4	ACT	Complete HCV Inspections, including quality control inspections, in a timely manner; require landlords to complete necessary repairs in a timely manner.	HCV	January 1, 2020	December 31, 2024	70%	Underway
1.4	STR	Create a safety plan for SLHA central office	Executive	April 1, 2021	December 31, 2024	35%	
1.4.1	ACT	Assess current safety practices and informal safety plans	Executive	April 1, 2021	December 31, 2024	30%	Underway
1.4.2	ACT	Review existing policies regarding access to SLHA central office and update as needed; develop a formal safety plan if unavailable	Executive	April 1, 2021	December 31, 2024	30%	Underway
1.4.3	ACT	Create emergency management plan, creating signage of evacuation plans if unavailable	Development & Modernization	August 30, 2021	December 30, 2024	80%	Underway
1.4.4	ACT	Conduct preparedness exercises (active shooter, fire, earthquake, tornado, etc)	Development & Modernization	June 30, 2022	December 31, 2024	0%	Not started
2	Goal	Support safe and secure environments for SLHA's residents and staff				28%	
2.1	STR	Update Capital and Property Portfolio Plans	Executive, Development & Modernization	September 20, 2020	December 31, 2024	60%	
2.1.1	ACT	Perform Physical Needs Assessment of properties	Development & Modernization	April 1, 2021	March 31, 2022	100%	Complete
2.1.2	ACT	Perform Asset repositioning exercise to create portfolio plan; considering Demo/disposition, RAD, Section 8 conversion, etc.	Executive, Development & Modernization	October 1, 2021	December 31, 2024	100%	Complete
2.1.3	ACT	Perform Environmental Review	Development & Modernization	September 1, 2020	June 30, 2023	100%	Complete
2.1.4	ACT	Explore non-traditional financing tools (bonds, tax credits, opportunity zones, refinancing, etc.) for top priority properties within Portfolio Plan	Development & Modernization	November 1, 2021	December 31, 2024	0%	Not started
2.1.5	ACT	Identify and leverage underutilized assets to generate revenue	Executive, Development & Modernization	December 1, 2021	October 31, 2024	10%	Underway

St. Louis Housing Authority
2020 - 2025 Strategic Plan Goal Tracker

2.2	**STR**	Communicate benefits and program changes of new housing programs (i.e. RAD) to internal and external stakeholders	Development & Modernization	January 13, 2022	June 30, 2025	0%	
2.2.1	**ACT**	Develop talking points, PR/campaign materials for the new programs being adopted across portfolio (internal and external stakeholders)	Development & Modernization	January 13, 2022	December 31, 2024	0%	Not started
2.2.2	**ACT**	Schedule meetings with different stakeholder groups (staff, TAB, general public mtgs, etc.)	Development & Modernization	March 25, 2022	April 30, 2023	0%	Not started
2.2.3	**ACT**	Develop online content (website, social media) to communicate new program info, FAQs, etc.	Development & Modernization	January 13, 2022	December 31, 2024	0%	Not started
2.3	**STR**	Implement Portfolio Plan	Executive, Development & Modernization	April 5, 2022	July 22, 2025	**23%**	
2.3.1	**ACT**	Identify and secure financing to complete redevelopment of Clinton-Peabody (see Goal 4)	Executive, Development & Modernization	April 5, 2022	December 31, 2024	40%	Underway
2.3.2	**ACT**	Develop procurement solicitation (RFP/RFQ) for development assistance	Development & Modernization	May 5, 2022	July 5, 2025	30%	Underway
2.3.3	**ACT**	Implement development plan in accordance with scope of work outlined in the RFP/RFQ/contract	Development & Modernization	July 5, 2022	July 22, 2025	0%	Not started
2.4	**STR**	Pursue development opportunities (new)	Executive, Development & Modernization	April 1, 2021	December 31, 2024	**28%**	
2.4.1	**ACT**	Ensure spending of replacement housing funds by regulatory deadline (some funds may be used for Clinton-Peabody - refer to Goal 4)	Development & Modernization	April 1, 2021	December 31, 2024	80%	Underway
2.4.2	**ACT**	Identify sites for potential new development	Executive, Development & Modernization	May 1, 2021	December 31, 2024	10%	Underway
2.4.3	**ACT**	Develop procurement solicitation (RFP/RFQ) for development assistance	Development & Modernization	June 1, 2021	December 31, 2024	10%	Underway
2.4.4	**ACT**	Implement development plan in accordance with scope of work outlined in the RFP/RFQ/contract	Development & Modernization	July 12, 2021	December 31, 2024	10%	Underway
3	**Goal**	Strengthen monitoring and oversight of Property Management companies					
3.1	**STR**	Strengthen contract compliance monitoring and enforcement and revise contract language	Asset Management	January 1, 2021	December 31, 2024	93%	
3.1.1	**ACT**	Strengthen contract compliance monitoring and enforcement and revise contract language	Asset Management	January 1, 2021	December 1, 2021	100%	On-going
3.1.2	**ACT**	Monitor the performance metrics and baseline measures by inspecting the properties at least annually, reviewing monthly reports submitted by property managers, and meeting with the property management companies monthly.	Asset Management	February 1, 2021	December 31, 2024	80%	On-going
3.1.3	**3.1.4**	Enforce compliance with contract requirements, requiring corrective action plans as needed.	Asset Management	January 1, 2021	December 31, 2024	100%	On-going
3.2	**STR**	Create and enforce standards of professionalism and customer service across all properties	Asset Management, Property Management & Human Resources	October 1, 2021	December 31, 2025	5%	
3.2.1	**ACT**	Convene two meetings with property management companies to mutually agree on a standard code of conduct and dress code for employees at public housing developments.	Asset Management	October 1, 2021	June 30, 2025	10%	Underway
3.2.2	**ACT**	Utilizing information from meetings, develop standard code of conduct and dress code for property management staff.	Asset Management	October 1, 2021	June 30, 2025	0%	Not started
3.2.3	**ACT**	Annually, conduct customer service/professionalism training for property management companies.	Asset Management	October 1, 2021	December 31, 2025	10%	Underway
3.2.4	**ACT**	Monitor property management companies for adherence to the code of conduct and dress code.	Asset Management	October 21, 2021	December 31, 2025	0%	Not started
4	**Goal**	Plan and implement redevelopment of Clinton-Peabody				42%	
4.1	**STR**	Continue to implement actions agreed upon in Consent Agreement	Legal	January 1, 2020	December 31, 2022	100%	**Complete**
4.1.1	**ACT**	Refer to consent agreement and implement	Legal	January 1, 2020	December 31, 2022	100%	Complete
4.2	**STR**	Identify Master Developer to identify financing to complete redevelopment of Clinton-Peabody	Executive, Development & Modernization	April 5, 2022	December 31, 2024	55%	
4.2.1	**ACT**	Solicit for Master Developer to determine type of project and financing	Development & Modernization	April 5, 2022	December 31, 2022	100%	Complete

St. Louis Housing Authority
2020 - 2025 Strategic Plan Goal Tracker

4.2.2	**ACT**	Analysis and determination of viable project and financing	Development & Modernization	June 5, 2022	September 30, 2024	10%	Underway
4.3	**STR**	Provide clear communication in transparent manner to residents and the community	Development & Modernization	June 5, 2022	December 31, 2025	0%	
4.3.1	**ACT**	Support existing residents during redevelopment and construction activities	Development & Modernization	June 5, 2022	December 31, 2025	0%	Not started
4.4	**STR**	Develop and Implement plan to redevelop Clinton-Peabody	Development & Modernization	February 23, 2022	December 31, 2026	27%	
4.4.1	**4.4.2**	See 4.3.1	Development & Modernization	February 23, 2022	December 31, 2025	0%	Not started
4.4.2	**ACT**	Hire 3rd party developer to implement development plan	Executive, Development & Modernization	February 28, 2022	April 30, 2023	100%	Complete
4.4.3	**ACT**	Analysis of viable development and funding options from 4.2.1	Development & Modernization	July 31, 2022	April 1, 2025	20%	Underway
4.4.4	**ACT**	Create development plan and schedule	Development & Modernization	July 31, 2022	October 1, 2024	60%	Underway
4.4.5	**ACT**	Implement development plan and schedule	Development & Modernization	January 23, 2023	April 1, 2026	10%	Underway
4.4.6	**ACT**	Concept, Pre-Development	Development & Modernization	July 1, 2022	June 30, 2026	30%	Underway
4.4.7	**ACT**	Environmental Assessment, Review	Development & Modernization	July 31, 2022	June 30, 2024	70%	On-going
4.4.8	**ACT**	Initiate Public Engagement	Development & Modernization	July 31, 2022	December 31, 2024	50%	Underway
4.4.9	**ACT**	Tax Credit Applications,Abatement,Zoning,Utility	Development & Modernization	July 31, 2022	December 31, 2026	10%	Underway
4.4.10	**ACT**	HUD Development Proposal,Evidentiaries,Closing	Development & Modernization	July 31, 2022	December 31, 2024	0%	Not started
4.4.11	**ACT**	Construction-Site Prep, Housing & Public Improvements	Development & Modernization	July 31, 2022	December 31, 2026	0%	Not started
4.4.12	**ACT**	Construction	Development & Modernization	July 31, 2022	December 31, 2026	0%	Not started
4.4.13	**ACT**	Lease-Up and Development Close-Out	Development & Modernization	July 31, 2022	December 31, 2027	0%	Not started
4.5	**STR**	Ensure safe and secure environments for Clinton-Peabody residents and staff (see Goal 1)	Asset Management & Property Management			28%	0
5	**Goal**	Expand housing opportunities within the Housing Choice Voucher program					
5.1	**STR**	Improve relations with HCV participants and property owners	HCV	June 1, 2022	December 31, 2025	28%	
5.1.1	**ACT**	Create and Implement Customer Service Plan for HCV participants	HCV	June 1, 2022	December 31, 2024	20%	Underway
5.1.2	**ACT**	Update the resident and landlord information packets	HCV	June 1, 2022	June 1, 2024	90%	Needs Ex. Approval
5.1.3	**ACT**	Annually, issue landlord satisfaction survey to identify program strengths and weaknesses	HCV	June 1, 2022	December 31, 2025	0%	Underway
5.1.4	**ACT**	Annually, issue resident satisfaction survey to identify program strengths and weaknesses	HCV	June 1, 2022	December 31, 2025	0%	Underway
5.2	**STR**	Increase number of vouchers	HCV	January 1, 2020	December 31, 2024	80%	
5.2.1	**ACT**	Monitor NOFAs for vouchers	HCV	January 1, 2020	December 31, 2024	80%	On-going
5.2.2	**ACT**	Apply for grants	HCV	January 1, 2020	December 31, 2024	80%	On-going
5.2.3	**ACT**	Implement if awarded	HCV	January 1, 2020	December 31, 2024	80%	On-going
5.3	**STR**	Provide mobility support to households that seek to live in areas of opportunity	HCV	October 1, 2019	September 30, 2024	60%	
5.3.1	**ACT**	Introduce HCV participants to Mobility Counseling program at recertification; enroll participants	HCV	January 1, 2020	January 1, 2024	60%	On-going
5.3.2	**ACT**	Provide pre/post move counseling	HCV	October 1, 2019	September 30, 2024	60%	Underway
5.3.3	**ACT**	Property owner outreach	HCV	October 1, 2019	September 30, 2024	60%	Underway
5.3.4	**ACT**	Continue to have competitive payment standards	HCV	January 1, 2020	January 1, 2024	60%	Complete

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6	Goal	Expand and diversify funding and partnerships				50%	
6.1	STR	Expand resources for resident services	Resident Initiatives	October 1, 2019	December 31, 2024	100%	
6.1.3	ACT	Submit application for NOFA Mobility Program	Ascend	Spring/Summer 2020	Fall 2020	100%	Complete
6.1.4	ACT	Leverage ConnectHome USA program to expand internet access to residents through external partnerships	IT	October 1, 2019	September 30, 2023	100%	Complete
6.2	STR	Explore creating "grant writing" position	Executive	October 1, 2021	September 1, 2025	10%	
6.2.1	ACT	Identify funding options for this position	Executive	March 1, 2022	December 31, 2024	10%	Underway
6.2.2	ACT	Conduct benchmarking on how other PHAs seek grant funding	Executive	October 1, 2021	December 31, 2024	20%	Underway
6.2.3	ACT	Develop grant writing job description	HR	April 1, 2022	December 31, 2024	0%	Not Started
6.3	STR	Expand resources for housing opportunities	Executive	September 1, 2021	October 1, 2025	25%	
6.3.1	ACT	Explore non-traditional financing tools (bonds, tax credits, opportunity zones, etc.) - see Goal 2	Executive	September 1, 2021	December 31, 2024	50%	Underway
6.3.2	ACT	Apply for non-traditional financing tools	Executive	October 1, 2022	October 1, 2025	0%	Not Started
6.4	STR	Attract resources from the philanthropic, local, civic and business community with specific requests	Executive	October 1, 2020	September 1, 2025	63%	
6.4.1	ACT	Direct funding raised via 80th Anniversary event to resident related activities	Executive	January 1, 2021	December 31, 2023	100%	Complete
6.4.2	ACT	Create ConnectHome partnerships with partner organizations	Executive, IT	January 9, 2020	September 30, 2023	100%	Underway
6.4.3	ACT	Leverage resources from Program Coordinating Committee within Resident Initiatives	Resident Initiatives	October 1, 2020	December 31, 2024	60%	Underway
6.4.4	ACT	Develop MOUs with partner agencies	Resident Initiatives	December 1, 2020	December 31, 2024	30%	Underway
6.4.5	ACT	Use calendar, key milestones, and funding requirements for the priority foundations in region	Executive	October 1, 2021	September 30, 2025	50%	Not Started
6.4.6	ACT	Identify grant/funding opportunities for youth services	Resident Initiatives	October 1, 2021	September 30, 2024	40%	On-going
6.5	STR	Leverage instrumentalities to generate additional resources to support the authority's mission	Executive	January 1, 2020	September 30, 2025	50%	
6.5.1	ACT	Create earned income/non-federal income through repurposing existing assets	Executive	September 1, 2021	September 30, 2025	50%	Underway
6.5.2	6.5.3	Analyze existing instrumentality/affiliate structure and determine optimal structure	Executive	January 1, 2020	December 31, 2024	50%	Underway
7	Goal	Optimize internal operations				39%	
7.1	STR	Leverage technology for efficiencies and improved performance	IT	January 1, 2020	December 31, 2024	51%	
7.1.1	ACT	Complete implementation of Yardi Phase 1 (internal)	IT	January 1, 2020	April 30, 2023	100%	Underway
7.1.2	ACT	Launch RentCafe module and marketing programs for Owners, Participants and Residents	IT, HCV & PHA	January 1, 2020	April 30, 2024	50%	On-going
7.1.3	ACT	Explore purchase order workflows and implement if feasible	IT	April 1, 2021	December 31, 2024	10%	Underway
7.1.4	ACT	Plan for implementation of additional Yardi modules that were purchased (e.g. Budget, Construction, online rent payments, etc.)	IT	July 1, 2021	June 30, 2024	0%	Not Started
7.1.5	ACT	Provide training to staff to better protect sensitive and confidential information from cyber risks	IT	January 1, 2020	December 31, 2024	60%	Underway
7.1.6	ACT	Further virtualize the IT server environment to eliminate the need for physical hardware.	IT	January 1, 2020	December 31, 2024	60%	On-going
7.1.7	ACT	Update and better utilize Microsoft 365 tools, such as SharePoint and Teams	Everyone	March 15, 2020	December 31, 2024	80%	On-going
7.2	STR	Optimize processes, procedures and controls	Executive	January 1, 2020	December 31, 2024	57%	
7.2.1	ACT	Review existing procedures, manuals, policies, etc. to identify areas where updates are needed or gaps exist	Executive	January 1, 2020	December 31, 2022	100%	Complete
7.2.2	ACT	Update and create policies/procedures/etc. within team/department with agency-wide standards	Executive	January 1, 2021	December 31, 2024	70%	Underway
7.2.3	ACT	Create Business Continuity Plan to ensure critical processes continue in the event of a disruption.	Executive	March 15, 2020	September 30, 2024	90%	Underway
7.2.4	ACT	Update Personnel Policy	HR	May 21, 2021	December 31, 2024	70%	Underway
7.2.5	ACT	Compile key procedures into an SLHA Standard Operating Procedure	Executive	December 31, 2021	June 30, 2024	10%	Underway
7.2.6	ACT	Create a maintenance framework to ensure that all SLHA plans remain current and applicable	Executive	December 31, 2021	December 31, 2024	0%	Not Started
7.3	STR	Retain and attract talent	HR	March 1, 2022	December 31, 2025	5%	
7.3.1	ACT	Perform compensation and benefits study; request recommendations	HR	March 1, 2022	December 31, 2025	10%	Underway
7.3.2	ACT	Update Succession Plan to identify next generation of SLHA leaders	HR	March 1, 2022	December 31, 2024	0%	Not Started
7.4	STR	Provide training and professional development opportunities to staff	HR	April 1, 2021	December 31, 2025	43%	

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7.4.1	**ACT**	Identify agency-wide training needs - required training AND "soft skills" (including training on processes); implement as needed	HR	June 1, 2021	December 31, 2025	70%	Underway
7.4.2	**ACT**	Create and implement framework for Personalized Development/Growth Plans for all SLHA staff	HR	April 1, 2021	December 31, 2025	0%	Underway
7.4.3	**ACT**	Conduct annual staff retreat or "in-service".	HR	April 1, 2021	December 31, 2025	60%	On-going
7.5	**STR**	Recapture HCV High Performer status	HCV	February 24, 2020	December 31, 2025	33%	
7.5.1	**ACT**	Hold monthly SEMAP meetings to identify status and deficiencies	Internal Auditor, HCV	June 1, 2021	December 31, 2025	40%	Underway
u	**ACT**	Conduct bi-annual compliance/file reviews of HCV files; report findings to Executive Director	Operations	June 1, 2021	December 31, 2025	20%	On-going
7.5.3	**ACT**	Hold annual debriefing after SEMAP submission, identifying areas of improvement	Operations	October 15, 2020	December 31, 2025	20%	Underway
7.5.4	**ACT**	Streamline and simplify forms and documents used by HCV participants and owners	Operations	February 24, 2020	April 30, 2025	50%	Underway
7.6	**STR**	Recapture PH High Performer status	Asset Management	January 1, 2020	December 31, 2025	48%	
7.6.1	**ACT**	Hold monthly PHAS indicators meetings to identify status and deficiencies	Asset Management	January 1, 2020	December 31, 2025	80%	On-going
7.6.2	**ACT**	Conduct bi-annual Public Housing files; report findings to Executive Director	Operations	June 1, 2020	December 31, 2025	50%	On-going
7.6.3	**ACT**	Hold annual debriefing after PHAS submission, identifying areas of improvement	Operations	October 15, 2020	December 31, 2025	20%	On-going
7.6.4	**ACT**	Streamline and simplify forms and documents used by public housing residents and property management companies	Asset Management	December 1, 2021	December 31, 2025	40%	Underway
8	**Goal**	Promote and maintain positive community identity and relationships				48%	
8.1	**STR**	Create PH Resident Engagement Plan	Resident Initatives	August 1, 2020	December 31, 2025	40%	
8.1.1	**ACT**	Research and Identify best practices for resident engagement	Resident Initatives	July 1, 2021	December 31, 2024	80%	Underway
8.1.2	**8.1.3**	Convene meeting of residents to obtain feedback (e.g. TAB, resident commissioners)	Resident Initatives	December 1, 2021	December 31, 2024	60%	Underway
8.1.3	**ACT**	Create draft Engagement Plan	Communications	August 31, 2022	June 28, 2025	20%	Underway
8.1.4	**ACT**	Submit draft Plan for comment and update as appropriate (Board meeting packet)	Executive	November 1, 2022	June 30, 2025	0%	Not Started
8.2	**STR**	Create HCV Participant/Landlord Engagement Plan	Communications & HCV	August 1, 2021	December 31, 2025	24%	
8.2.1	**ACT**	Research and Identify best practices for HCV participant and Landlord engagement	Communications & HCV	August 1, 2021	June 28, 2024	40%	Underway
8.2.2	**ACT**	Convene meeting of HCV participants to obtain feedback	HCV	August 1, 2022	December 31, 2024	0%	Not Started
8.2.3	**ACT**	Convene meeting of Landlord to obtain feedback	HCV	August 1, 2022	December 31, 2024	50%	On-going
8.2.4	**ACT**	Create draft Engagement Plan	Communications	August 1, 2021	June 30, 2025	30%	Underway
8.2.5	**ACT**	Submit draft Plan for comment and update as appropriate (Board meeting packet)	Executive	November 1, 2022	June 30, 2025	0%	Not Started
8.3	**STR**	Strengthen relationships with the community and civic organizations	Executive	March 1, 2020	December 31, 2025	60%	
8.3.1	**ACT**	Identify civic/community groups with shared interest	Executive	March 1, 2020	December 31, 2025	60%	On-going
8.3.2	**ACT**	Prioritize and determine appropriate SLHA person(s) to engage the civic/community group (existing relationships, interest or passion in that area, etc.)	Executive	March 1, 2020	December 31, 2025	60%	On-going
8.3.3	**ACT**	Develop one-pager or other PR materials that highlights SLHA's role in community and potential partnership opportunities	Communications	September 1, 2021	June 28, 2025	60%	On-going
8.3.4	**ACT**	Seek to formalize partnership through standardized MOU process or other arrangements as necessary	Resident Initiatives	August 15, 2020	December 31, 2025	60%	On-going
	ACT	Develop internal standards and protocols for managing relationships with partners (e.g. point of contact, frequency of outreach, type of outreach, etc.)	Resident Initiatives	July 1, 2020	December 31, 2025	60%	On-going
8.4	**STR**	Utilize website and social media more effectively to communicate with stakeholders	Communications	January 1, 2020	December 31, 2024	70%	
8.4.1	**ACT**	Post to social media updates on SLHA programs, events, success stories, etc.	Communications	January 1, 2020	December 31, 2024	80%	On-going
8.4.2	**ACT**	Continue development of relevant website content to increase awareness of SLHA activities	Communications	January 1, 2020	December 31, 2024	80%	On-going
8.4.3	**ACT**	Develop internal guidelines for sharing content across digital platforms	Communications	June 1, 2021	June 28, 2024	20%	Underway
8.4.4	**8.4.5**	Connect social media feeds to SLHA website (you can see social media posts on site)	Communications	June 1, 2021	September 30, 2023	100%	Complete
8.5	**STR**	Create Transparency Plan that provides guidance to public on SLHA communication practices	Executive	July 1, 2021	June 1, 2025	5%	
8.5.1	**ACT**	Research and Identify best practices on communication transparency between agencies and the public	Executive	July 1, 2021	December 31, 2024	20%	On-going

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8.5.2	**8.5.3**	Convene meeting of residents to obtain feedback (e.g. TAB, resident commissioners)	Executive	January 30, 2022	March 31, 2024	0%	Not Started
8.5.3	**ACT**	Create draft communication transparency plan	Executive	March 1, 2022	June 30, 2024	0%	Not Started
8.5.4	**ACT**	Submit draft Plan for comment and update as appropriate (Board meeting packet)	Executive	June 1, 2022	December 31, 2024	0%	Not Started
8.6	**STR**	Update communications plan to include crisis communication	Communications	July 1, 2020	September 30, 2023	100%	**Complete**
8.6.1	**ACT**	Research and identify best practices for crisis communications	Communications	July 1, 2020	August 15, 2020	100%	Complete
8.6.2	**ACT**	Create draft communications plan with crisis communication component	Communications	December 31, 2021	March 1, 2022	100%	Complete
8.7	**STR**	Streamline and simplify forms and documents used by residents, HCV participants and landlords	Asset Management, HCV, IT	July 1, 2021	December 31, 2025	23%	
8.7.1	**ACT**	Edit and submit digital files for current forms in use to Marketing for updating	Asset Management, HCV, IT	July 1, 2021	December 31, 2024	60%	Underway
8.7.2	**ACT**	Forms to be re-designed and reviewed for approval	Communications, Legal, Executive, IT	July 1, 2021	March 31, 2025	10%	Not Started
8.7.3	**ACT**	Approved forms distributed and linked to website	Communications, IT	July 1, 2021	March 10, 2025	0%	Not Started
8.8	**STR**	Develop relationships within affordable housing industry to share knowledge and best practices	Everyone	January 1, 2020	December 31, 2025	30%	
8.8.1	**ACT**	Attend local, regional and national convenings/conferences	Everyone	January 1, 2020	December 31, 2025	60%	Underway
8.8.2	**ACT**	Serve on national committees and boards related to affordable housing	Executive	January 1, 2022	December 31, 2025	0%	Not Started
8.9	**STR**	Strengthen internal communication	Everyone	June 1, 2021	December 31, 2024	60%	Underway
8.9.1	**ACT**	Issue quarterly staff newsletters that highlight status of current activities	Communications	June 1, 2021	December 31, 2024	60%	On-going
8.10.	**STR**	Create culture of employee engagement and ownership	HR	December 1, 2021	December 31, 2024	70%	On-going
8.10.1	**ACT**	Revive event committee as Employee Appreciation Committee	HR	December 1, 2021	December 31, 2024	70%	On-going
9	**9**	Improve quality of life of PH residents and HCV participants through services and programs				63%	
9.1	**STR**	Expand resources for resident services, including funding for additional resident services staff	Resident Initiatives	December 1, 2019	December 31, 2025	50%	
9.1.1	**ACT**	Refer to Strategy 6.1	Resident Initiatives	December 1, 2019	December 31, 2024	50%	On-going
9.1.2	**STR**	Continue implementation of Human Services Plan	Resident Initiatives	October 1, 2019	December 31, 2025	65%	
9.1.3	**ACT**	Secure MOUs and Partner Agreements for defined services	Resident Initiatives	October 1, 2019	December 31, 2025	30%	Underway
9.1.4	**ACT**	Expand Program Coordinating Committee	Resident Initiatives	October 1, 2019	December 31, 2024	100%	Complete
9.2	**STR**	Prepare for transition for completion of Jobs Plus program	Resident Initiatives	April 1, 2020	September 30, 2022	100%	**Complete**
9.2.1	**ACT**	Submit close-out documents including SF-425 financials, Demographic Report, JPEID, Budget Explanation and Narrative as defined in HUD grant agreement	Resident Initiatives	April 1, 2020	June 30, 2021	100%	Complete
9.3	**STR**	Expand residents' access to technology	IT	October 1, 2021	April 30, 2025	50%	
9.3.1	**ACT**	Implement Rent Café profiles for clients	IT	January 1, 2020	April 30, 2025	50%	Underway
9.4	**STR**	Complete improvements to Al Chappelle Community Center and increase utilization of center for programs and events	Resident Initative & Development & Modernization	October 1, 2020	December 31, 2025	45%	
9.4.1	**ACT**	Create or improve partnerships with social service agencies (see 6.4.4; 9.2.1)	Resident Initiatives	October 1, 2020	December 31, 2025	40%	On-going
9.4.2	**ACT**	Utilization of the Resident Initiative Marketing Plan	Resident Initiatives	October 1, 2020	December 31, 2025	50%	On-going
9.5	**STR**	Expand access of resident initiatives programs to HCV participants	Resident Initiatives	December 1, 2021	December 31, 2025	70%	
9.5.1	**ACT**	Create marketing and communications plan specific to HCV	Resident Initiatives	December 1, 2021	June 30, 2024	10%	Underway
9.5.2	**ACT**	Inform and Educate SLHA staff of plan	Resident Initiatives	July 1, 2022	December 31, 2024	100%	Complete
9.5.3	**ACT**	Distribute RI information to all HCV households annually	Resident Initiatives	December 31, 2021	December 31, 2024	100%	Complete

ATTACHMENT #14

Section C.1 – Resident Advisory Board (RAB)

Comments and Responses

Special Notice:
The Public Hearing is scheduled for June 17, 2024; therefore, Comments and Responses will be provided to the Board of Commissioners at the meeting on June 27, 2024.

Attachment #1
Public Hearing Comments and Responses

ATTACHMENT #15

Section C.2 – Form HUD-50077-SL
Certification by State or Local Officials

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan
(All PHAs)

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

I, Nahuel Fefer, the Executive Director, CDA
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years ______ and/or Annual PHA Plan for fiscal year 2024 of the St. Louis Housing Authority is consistent with the Consolidated Plan or
PHA Name

State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

The City of St. Louis Missouri
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

The St. Louis Housing Authority's (SLHA) Fiscal Year 2024 Agency Plan (Annual Plan) is consistent with the City of St. Louis's (City) Consolidated Plan because its business strategies are aligned to provide programs that benefit the very-low and low-to-moderate income households in the City. SLHA and the City strive to accomplish this through the prevention or elimination of neighborhood blight and by provide safe, decent, affordable housing choices throughout the community. The SLHA and the City continue to pursue and invest in opportunities for mixed-financed partnerships with private developers, investors and community residents to develop affordable housing choices to improve the quality and energy efficiency of housing in the jurisdiction.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official: Nahuel Fefer	Name of Board Chairperson: Sal Martinez
Signature: Date:	Signature: Date:

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan
(All PHAs)

U. S Department of Housing and Urban Development
Office of Public and Indian Housing
OMB No. 2577-0226
Expires 3/31/2024

Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

I, Don Roe, the Director of Planning and Urban Design Agency
Official's Name *Official's Title*

certify that the 5-Year PHA Plan for fiscal years ______ and/or Annual PHA Plan for fiscal year 2024 of the St. Louis Housing Authority is consistent with the Consolidated Plan or
PHA Name

State Consolidated Plan including the Analysis of Impediments (AI) to Fair Housing Choice or Assessment of Fair Housing (AFH) as applicable to the

The City of St. Louis Missouri
Local Jurisdiction Name

pursuant to 24 CFR Part 91 and 24 CFR § 903.15.

Provide a description of how the PHA Plan's contents are consistent with the Consolidated Plan or State Consolidated Plan.

The St. Louis Housing Authority's (SLHA) Fiscal Year 2024 Agency Plan (Annual Plan) is consistent with the City of St. Louis's (City) Consolidated Plan because its business strategies are aligned to provide programs that benefit the very-low and low-to-moderate income households in the City. SLHA and the City strive to accomplish this through the prevention or elimination of neighborhood blight and by provide safe, decent, affordable housing choices throughout the community. The SLHA and the City continue to pursue and invest in opportunities for mixed-financed partnerships with private developers, investors and community residents to develop affordable housing choices to improve the quality and energy efficiency of housing in the jurisdiction.

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official: Don Roe	Title: Director of Planning and Urban Design Agency
Signature:	Date:

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure consistency with the consolidated plan or state consolidated plan.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

ATTACHMENT #16

Section C.3– Form HUD-50077-ST-HCV-HP
Certification of Compliance

Certifications of Compliance with PHA Plan and Related Regulations ***(Standard, Troubled, HCV-Only, and High Performer PHAs)***	**U.S. Department of Housing and Urban Development** Office of Public and Indian Housing **OMB No. 2577-0226** **Expires 3/31/2024**

PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations including PHA Plan Elements that Have Changed

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ____ 5-Year and/or__X__ Annual PHA Plan, hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the PHA fiscal year beginning 2024 , in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located (24 CFR § 91.2).
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments (AI) to Fair Housing Choice, or Assessment of Fair Housing (AFH) when applicable, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan (24 CFR §§ 91.2, 91.225, 91.325, and 91.425).
3. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Resident Advisory Board or Boards in developing the Plan, including any changes or revisions to the policies and programs identified in the Plan before they were implemented, and considered the recommendations of the RAB (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
4. The PHA provides assurance as part of this certification that:
   (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
   (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
   (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 et seq.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program.
7. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.
8. For PHA Plans that include a policy for site-based waiting lists:
   - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2011-65);

- The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
- Adoption of a site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
- The PHA shall take reasonable measures to assure that such a waiting list is consistent with affirmatively furthering fair housing; and
- The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR 903.7(o)(1).

9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. In accordance with 24 CFR § 5.105(a)(2), HUD's Equal Access Rule, the PHA will not make a determination of eligibility for housing based on sexual orientation, gender identify, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
11. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
12. The PHA will comply with the requirements of Section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
13. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.
14. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
15. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
16. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
17. The PHA will keep records in accordance with 2 CFR 200.333 and facilitate an effective audit to determine compliance with program requirements.
18. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act**,** the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
19. The PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Financial Assistance, including but not limited to submitting the assurances required under 24 CFR §§ 1.5, 3.115, 8.50, and 107.25 by submitting an SF-424, including the required assurances in SF-424B or D, as applicable.
20. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
21. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
22. The PHA certifies that it is in compliance with applicable Federal statutory and regulatory requirements, including the Declaration of Trust(s).

St. Louis Housing Authority (SLHA)	MO001
PHA Name	PHA Number/HA Code

__X__ Annual PHA Plan for Fiscal Year 2024

_____ 5-Year PHA Plan for Fiscal Years 20____ - 20____

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Name of Acting Executive Director Latasha Barnes Signature Date 7/15/2024	Name Board Chairman Sal Martinez Signature Date 7/15/2024

The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. This information is collected to ensure compliance with PHA Plan, Civil Rights, and related laws and regulations including PHA plan elements that have changed.

Public reporting burden for this information collection is estimated to average 0.16 hours per year per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

ATTACHMENT #17

Section C.3– Form HUD-50077-CR
Civil Rights Certification

Civil Rights Certification *(Qualified PHAs)*	**U.S. Department of Housing and Urban Development** Office of Public and Indian Housing **OMB Approval No. 2577-0226** **Expires 3/31/2024**

Civil Rights Certification

Annual Certification and Board Resolution

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairperson or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the 5-Year PHA Plan , hereinafter referred to as" the Plan", of which this document is a part, and make the following certification and agreements with the Department of Housing and Urban Development (HUD) for the fiscal year beginning _______________________ in which the PHA receives assistance under 42 U.S.C. 1437f and/or 1437g in connection with the mission, goals, and objectives of the public housing agency and implementation thereof:

The PHA certifies that it will carry out the public housing program of the agency in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d—4), the Fair Housing Act (42 U.S.C. 3601-19), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), title II of the Americans with Disabilities Act (42 U.S.C. 12101 *et seq*.), and other applicable civil rights requirements and that it will affirmatively further fair housing in the administration of the program. In addition, if it administers a Housing Choice Voucher Program, the PHA certifies that it will administer the program in conformity with the Fair Housing Act, title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, title II of the Americans with Disabilities Act, and other applicable civil rights requirements, and that it will affirmatively further fair housing in the administration of the program. The PHA will affirmatively further fair housing, which means that it will take meaningful actions to further the goals identified in the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR § 5.150 through 5.180, that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing, and that it will address fair housing issues and contributing factors in its programs, in accordance with 24 CFR § 903.7(o)(3). The PHA will fulfill the requirements at 24 CFR § 903.7(o) and 24 CFR § 903.15(d). Until such time as the PHA is required to submit an AFH, the PHA will fulfill the requirements at 24 CFR § 903.7(o) promulgated prior to August 17, 2015, which means that it examines its programs or proposed programs; identifies any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and maintains records reflecting these analyses and actions.

St. Louis Housing Authority	MO001
PHA Name	PHA Number/HA Code

I hereby certify that all the statement above, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Acting Executive Director: Latasha Barnes	Name of Board Chairperson: Sal Martinez
Signature Date	Signature Date

The United States Department of Housing and Urban Development is authorized to collect the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality. The information is collected to ensure that PHAs carry out applicable civil rights requirements.

Public reporting burden for this information collection is estimated to average 0.16 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Table of Attachments

Other Documents and /or Certifications not included in the Annual Submission (Referencing Standard Template Form HUD-50075-ST)

ATTACHMENT #18

Section B.1 (c) – Deconcentration of Poverty and Income Mixing [24 CFR 903.1 and 903.2]

Deconcentration of poverty and income mixing is a policy that allows PHA's to bring higher income tenants into lower income developments and lower income tenants into higher income developments. In accordance with 24 CFR Part 903, a Deconcentration and Income Mixing Policy is required as a part of SLHA's Admissions and Continued Occupancy Policy (ACOP). SLHA's Deconcentration and Income Mixing Policy is included in Chapter 6 of the ACOP – Tenant Selection, Section 6.4.

Developments subject to the deconcentration of poverty and income mixing requirements are referred to as "covered" developments". Covered developments include general occupancy (or family) public housing developments.

Developments not subject to the requirement include public housing developments:

- with-fewer than 100 public housing units;
- designated specifically for elderly and/or disabled residents;
- approved for demolition or for conversion to tenant-based assistance; and
- approved mixed-finance developments using HOPE VI or public housing funds.

Table 2 - Average Income of Public Housing Developments includes a list of all SLHA developments, their annual income and if they are subject to the Deconcentration and Income Mixing Requirements.

SLHA will determine the average income of families in all covered developments on an annual basis. SLHA must then determine whether each of its covered developments falls above, within, or below the established income range (EIR), which is from 85 percent to 115 percent of the average family income. The results of SLHA's analysis are summarized on **Table 1 - Average Income of Families in All Covered Developments.**

If covered developments have an average income outside the EIR, SLHA will then determine whether or not these developments are consistent with its local goals and annual plan. If the development is not consistent with local goals and annual plan the SLHA may skip a family on the waiting list to reach another family in an effort that would further the goals of deconcentration.

Deconcentration of Poverty and Income Mixing

Table 1: Average Income of Familes in Covered Developments

Development Name	Average Income	Average Income ALL Developments	% of Income	Established Income Range (85% - 115%)
Clinton Peabody	$7,937	$12,287	65%	Below
James House	$8,406	$12,287	68%	Below
Euclid Plaza	$7,327	$12,287	60%	Below
Northside Scattered Sites	$11,216	$12,287	91%	Within
Parkview	$8,860	$12,287	72%	Below
Southside Scattered Sites	$10,076	$12,287	82%	Below
Badenhaus/Badenfest	$7,148	$12,287	58%	Below
LaSalle Park	$9,275	$12,287	75%	Below
Kingsbury Terrace	$11,645	$12,287	95%	Within
ALL Covered Developments	**$9,260**	**$12,287**	**75%**	-
ALL DEVELOPMENTS	**$12,287**	**$12,287**	**100%**	-

*As of December 31, 2023

Deconcentration of Poverty and Income Mixing
Table 2: Average Income of Public Housing Developments*

Dev. Number	Development Name		Count of Families	Average Income
020	Clinton-Peabody	Covered	135	$7,937
100	James House	Covered	110	$8,406
132	Euclid Plaza	Covered	105	$7,327
150	Towne XV (NSSS)	Covered	5	$7,240
160	McMillan Manor (NSSS)	Covered	16	$7,553
170	West Pine	< 100 Units	83	$10,373
190	Parkview	Covered	242	$8,860
220	Lafayette Apartments (SSSS)	Covered	19	$9,531
230	California Gardens (SSSS)	Covered	9	$8,655
260	Page Manor (NSSS)	Covered	6	$4,077
280	Badenhaus Elderly (BH/BF)	Covered	86	$5,909
340	LaSalle Park	Covered	126	$9,275
350	Armand & Ohio (SSSS)	Covered	2	$4,056
370	Cochran Plaza	<100 Units	65	$12,712
380	Folsom (SSSS)	Covered	3	$4,240
381	Samuel Shepard (NSSS)	Covered	10	$8,947
382	Marie Fanger (SSSS)	Covered	3	$15,281
383	Cupples (NSSS)	Covered		
384	Hodiamont (NSSS)	Covered		
390	Badenfest Elderly (BH/BF)	Covered	19	$12,756
410	South Broadway (SSSS)	Covered	8	$16,985
411	Walnut Park (NSSS)	Covered	13	$15,025
412	Lookaway (NSSS)	Covered	12	$10,400
420	Lafayette Townhomes (SSSS)	Covered	14	$9,447
421	Tiffany Turnkey (SSSS)	Covered	12	$9,293
440	Murphy Park I	Mixed Finance/HOPE VI	73	$19,382
450	Murphy Park II	Mixed Finance/HOPE VI	56	$20,698
460	Murphy Park III	Mixed Finance/HOPE VI	57	$21,530
470	King Louis Square I	Mixed Finance/HOPE VI	35	$14,026
480	Les Chateau	Mixed Finance/HOPE VI	39	$15,933
490	King Louis Square II	Mixed Finance/HOPE VI	39	$17,799
500	Renaissance Place @ Grand I	Mixed Finance/HOPE VI	63	$23,244
510	McMillan Manor II (NSSS)	Covered	15	$18,167
520	King Louis Square III	Mixed Finance/HOPE VI	18	$13,481
540	Sr. Living @ Renaissance Place	Mixed Finance/HOPE VI	74	$13,019
550	Gardens at Renaissance Place	Mixed Finance/HOPE VI	21	$10,118
560	Cahill House	Mixed Finance/HOPE VI	86	$15,489
570	Renaissance Place @ Grand II	Mixed Finance/HOPE VI	33	$12,445
580	Cambridge Heights	Mixed Finance/HOPE VI	28	$17,609
590	Renaissance Place @ Grand III	Mixed Finance/HOPE VI	51	$14,649
600	Cambridge Heights II	Mixed Finance/HOPE VI	28	$19,631
620	Sr. Living @ Cambridge Heights	Mixed Finance/HOPE VI	75	$14,467
630	Arlington Grove	Mixed Finance/HOPE VI	66	$14,151
640	North Sarah	Mixed Finance/HOPE VI	56	$11,245
650	North Sarh II	Mixed Finance/HOPE VI	38	$10,373
660	North Sarah III	Mixed Finance/HOPE VI	36	$17,007
661	Kingsbury Terrace	Covered	112	$11,645
670	Preservation Square I	Mixed Finance/HOPE VI	18	$11,702
Grand Total			**2,220**	**$12,287**
All Covered Developments			**1,230**	**$9,260**

Combined Developments				
NSSS	Northside Scattered Sites	Covered	77	$11,216
SSSS	Southside Scattered Sites	Covered	70	$10,076
BH/BF	Badenhaus/Badenfest	Covered	105	$7,148

*As of December 31, 2023

ATTACHMENT #19

Section B.2 (b) – PHA Plan Update – Plan Elements Revised

Item 4 – Designated Housing Statement

Four (4) developments, Les Chateaux (MO001-000048) – 40 units, Senior Living at Renaissance Place (MO001-000054) – 75 units, Cahill House (MO001-000056) – 80 units and Senior Living at Cambridge Heights (MO001-000062 – 75 units are combined under one approved Designated Housing Plan. SLHA requested a two-year extension of the Designated Housing Plan and received HUD approval on July 26, 2022. SLHA is eligible to extend the plan for an additional 2-years and must receive HUD approval no later than September 5, 2024.

A Designated Housing Plan was submitted to HUD on April 19, 2023 for Parkview Apartments (MO001-000190) – 295 units, to designate the development as elder-only. This plan was approved by HUD on June 15, 2023 and is in effect for five years. The plan is eligible for renewal in two-year increments after the initial approval and the request must be approved by HUD no later than June 15, 2028.

ATTACHMENT #20

Affirmatively Furthering Fair Housing Analysis

The Affirmatively Further Fair Housing Analysis was submitted to HUD for review on October 21, 2013. HUD provided no response to the submission. Based on SLHA's very limited resources, it has chosen not to update the analysis on a piecemeal basis, but to update the analysis once it receives HUD's comments.

On January 19, 2023, HUD released its "Affirmatively Furthering Fair Housing" proposed rule with the comment period ending on April 10, 2023. SLHA will begin the process of creating an "Equity Plan" as required by the rule. Equity plans must be submitted to HUD no later than 365 days prior to the date for which a new five-year plan is due following the start of the fiscal year that begins on or after Jan. 1, 2026. The next five-year plan for SLHA is due in 2025.

ST. LOUIS HOUSING AUTHORITY

Affirmatively Furthering Fair Housing Analysis

I. Introduction

As a public housing authority (PHA), the St. Louis Housing Authority (SLHA) is required to submit an annual Agency Plan to HUD for approval, in accordance with the requirements of 24 CFR §903. As part of the Agency Plan, SLHA is required to certify that it complies with certain civil rights requirements and certify that it will affirmatively further fair housing (24 CFR §903.7 (o)). To be considered in full compliance with the affirmatively furthering fair housing requirements, a PHA needs to fulfill the requirements of 24 CFR §903.2(b) and;

1. Examine its programs or proposed programs;
2. Identify any impediments to fair housing choices within those programs;
3. Address those impediments in a reasonable fashion in view of the resources available;
4. Work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require PHA involvement; and
5. Maintain records reflecting these analyses and actions.

This document provides the required documentation to show SLHA's full compliance with the requirements to affirmatively further fair housing.

II. Fulfill the Requirements of 24 CFR §903.2(b)

Under the civil rights certification requirements at 24 CFR 903.7(o)(3), SLHA is required to fulfill the requirements of 24 CFR 903.2(b). 24 CFR §903.2(b) contains provisions that identify which public housing developments are subject to the requirements for deconcentration of poverty. This section does not impose any specific requirements on PHAs. However, 24 CFR §903.2(c) does impose specific requirements for implementation of deconcentration of poverty. SLHA assumes that the regulatory reference in 24 CFR §903.7(o)(3) is incorrect and that HUD's intention was to refer to the analysis requirements in 24 CFR §903.2(c). SLHA complies with HUD's deconcentration of poverty requirements under 24 CFR §903.2(c). The supporting documentation for the analysis is attached in Appendix A.

III. Examine SLHA's Programs and Proposed Programs

Neither HUD nor the public housing regulations offer any guidance for what an examination of a PHA program or proposed program entails under 24 CFR 903.7(o)(3)(i). To try to determine what an examination of its program is supposed to contain, SLHA reviewed references on HUD's website and materials published by advocacy organizations. The review of these materials suggest that the examination should include the following:

- A review of demographic information of program participants and applicants in relationship to the demographics of the community.

- An analysis of racially and ethnically concentrated areas of poverty in SLHA programs.

- A review of housing needs across protected classes.

SLHA has examined each of the three items as discussed below:

1. Demographic Review

SLHA operates two major HUD funded programs, public housing and Housing Choice Vouchers. The demographic information is shown in Tables 1-5 below.

Table 1
Racial Composition of Programs

	Public Housing				Housing Choice Vouchers			
Race	HOH	HOH %	Total Family Members	Total Family Members %	HOH	HOH %	Total Family Members	Total Family Members%
White	49	1.84%	61	1.02%	266	4.21%	409	2.46%
Black	2,605	97.68%	5,749	96.33%	6,026	95.36%	15,957	95.95%
Other	13	0.49%	158	2.65%	27	0.43%	262	1.58%

Table 2
Age of Participants in SLHA Programs

	Public Housing		Housing Choice Vouchers	
Age	Total Family Members	Total Family Members %	Total Family Members	Total Family Members%
1-17	2,630	44.07%	8,475	50.96%
18-61	2,711	45.43%	7,301	43.90%
62 and over	619	10.37%	848	5.10%

Table 3
Income Sources in SLHA Programs

	Public Housing		Housing Choice Vouchers	
Income Source	Number of Families	Percentage	Number of Families	Percentage
SSI	628	23.59%	1,752	27.75%
SS	948	35.61%	1,910	30.26%
Pension	162	6.09%	193	3.06%
TANF	226	8.49%	587	9.30%
Employment	842	31.63%	2,323	36.80%

Table 4
Average Income in SLHA Programs

Public Housing			Housing Choice Vouchers		
Average Income	Average Family Size	Percentage of Median	Average Income	Average Family Size	Percentage of Median
$10,734	2.24	19.38%	$11,447	2.63	18.39%

Table 5
Disabled in SLHA Programs[1]

Public Housing	Housing Choice Vouchers
Percentage of Families Containing a Member with a Disability	Percentage of Families Containing a Member with a Disability
24.78%	20.07%

Both the public housing and HCV programs have long waiting lists. Families are allowed to be on multiple waiting lists at the same time. Therefore, the demographics for waiting list of both programs are combined and shown in Tables 6- 10 below.

Table 6
Racial Composition of the Waiting List[2]

Race	HOH	HOH %	Total Family Members	Total Family Members %
White	138	1.23%	238	0.89%
Black	11,023	98.03%	15,957	98.53%
Other	83	0.74%	262	0.57%

Table 7
Age of Participants on the Waiting List

Age	Total Family Members	Total Family Members %
1-17	15,694	48.99%
18-61	15,608	48.72%
62 and over	649	2.03%

Table 8
Income Sources of Families on the Waiting List

Income Source	Number of Families	Percentage
SSI	1,696	13.02%
SS	1,423	10.92%
Pension	85	0.65%
TANF	2,862	21.96%
Employment	4,972	38.16%

Table 9
Average Income of Families on the Waiting List

Average Income	Average Family Size	Percentage of Median
$8,440	2.45	15.24%

[1] The number of persons with a disability is based on the number of persons receiving SSI. As SLHA is not allowed to inquire regarding the nature of the disability, SLHA has no data on the number of individuals that need special features in their unit.
[2] The last time the HCV waiting list was opened in 2007, a short form pre-application was taken. This process did not require the identification of racial composition for family members. Therefore, a significant number of family members are listed as race unidentified. For the purpose of this analysis, unidentified race is not considered.

Table 10
Disabled Families on the Waiting List[3]

Number of Families Claiming a Disability	Percentage of Families Claiming a Disability
933	2.91%

To compare SLHA programs to the surrounding community, SLHA used the Affirmatively Furthering Fair Housing (AI) performed by the City of St. Louis as its data source. It should be noted that the City's AI was completed in March 2012, but is yet to be approved by HUD. The AI states the following information.

Race

The City of St. Louis is a racially diverse city with whites and African Americans being the two largest racial or ethnic groups. The City has had an African American majority population since the 2000 Census. The white population, representing a bare majority of the city in the 1990 Census, has declined dramatically from its post-war population peak. In 1950, over 700,000 white residents called the city home. By 2010, this number had dropped fully 80% to 140,000. The 1980 Census showed the first drop in the African American population. This trend has continued and has accelerated, with the 2010 Census showing a faster decline in the African American population than in the white population for the first time. In fact, despite an 8.1% decline of the white population between 2000 and 2010, the share of this population actually inched up from 43.8% to 43.9%.

Since the 1970s, the North Side has been largely African-American; while the South Side was predominantly white. The 2010 Census data reveals a growing and unprecedented level of integration in the southern portion of the City, while the northern section remains predominately African-American. The African American population grew most significantly in the south central and southeastern portions of the City. The share of African Americans also increased, to a lesser extent, in each of the southwest St. Louis neighborhoods, as well as in the northern extremes of the city. African American population declines were witnessed most heavily in several South St. Louis neighborhoods. The pattern is reversed for the white population, with whites showing substantial percentage gains in these areas and losses in the extreme southern and northern portions of the City.

Populations of other races and ethnicities reside largely in the southern half of the City. Hispanics tend to live in the southeastern portion of the city, with Asians residing primarily in south-central neighborhoods or the central corridor (e.g., Central West End). Most other racial groups are very small in number and constitute a small percentage of the overall population.

[3] The number of disabled families is based on the number of families claiming a disability on the application.

The Racial Population Comparison (Table 11) shows the population breakdown by race of St. Louis City, St. Louis County, and the entire State of Missouri. St. Louis City and St. Louis County are separate political jurisdictions. St. Louis City and County taken together contain 22% of the population of Missouri. There are some similarities across the three jurisdictions. For instance, the Asian population is 2.9% of St. Louis City, 3% of St. Louis County, and 2% of the state as a whole, showing a very slight urban concentration. Looking at the white (non-Hispanic) and African American populations, however, one sees a distinct difference when comparing the three jurisdictions. Only 11% of the population of Missouri is African American, but the percentages increase in the population centers of St. Louis County (23%) and St. Louis City (49%). St. Louis City is the only county-equivalent (and the only major city) in the state of Missouri with the African-American population as the largest racial group.

Table 11
Racial Population Comparison

	St. Louis City		St. Louis County		Missouri	
Total Population	319,294		998,954		5,988,927	
White (non-Hispanic)	134,702	42.2 %	687,984	69%	4,850,748	81%
African American	156,389	49.0 %	231,801	23%	687,149	11%
American Indian	684	0.2%	1,632	0.2%	24,062	0.4%
Asian	9,233	2.9%	34,466	3%	97,221	2%
Two or More Races	6,616	2.1%	16,587	2%	106,142	2%
Other	540	0.2%	1,460	0.1%	11,135	0.2%
Hispanic	11,130	3.5%	25,024	3%	212,470	4%

Age

The population of St. Louis is comprised mostly of adults age 20 and over (75.5%), with 15.6% of the population being over the age of 60. The age spread for the City of St. Louis has some variations when compared to St. Louis County and the State of Missouri. St. Louis County and the State of Missouri are very similar when comparing the percentages in each age category, with the largest spread being 1.2%. The City's population makeup by age differs from that of the other two jurisdictions. The City has higher populations of people in their 20s and 30s, but lower percentages of people under 20 and over 60.

There has been a pronounced loss of children in the City over the past decade, except for the areas near downtown that experienced significant growth. The City lost roughly a third of its population age 5-14 from 2000 to 2010. Still, 67,539 children (under age 18) lived in the City as of April 1, 2010.

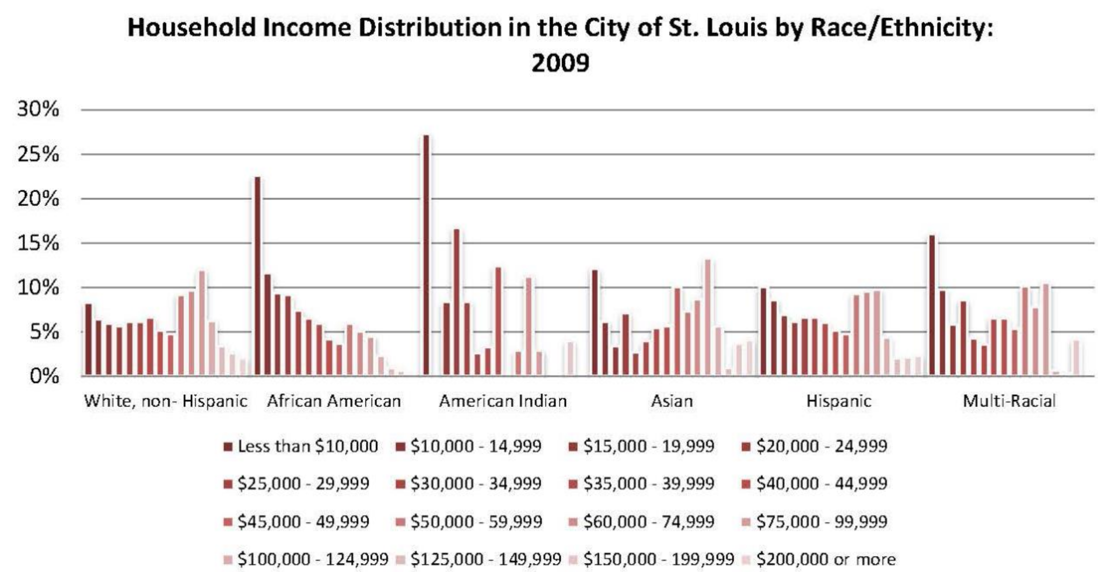
The young population is concentrated in the northern and southeastern sections of the city where the highest poverty rates exist. The Central Corridor has relatively few children.

The elderly population consists of citizens who are 65 years old or older. The aging population presents unique challenges for the City of St. Louis. At about 16% of the population, the elderly comprise a smaller proportion of the population in the City than in St. Louis County and the State of Missouri. However, over half the City's elderly population have some sort of disability, and many require housing modifications and/or attendant care. Many elders live alone and are dependent on social services and nursing care in order to remain in their homes.

<u>Income</u>

Income is one of the greatest determinants of housing access. In this measure, St. Louis ranks well below its surrounding states and its suburbs. According to the 2005-2009 ACS, the median household income in the City of St. Louis was $34,227, considerably less than the median income for the entire state of Missouri of $46,005 and far less than the median income for St. Louis County of $57,502. The table below highlights the disparity in income between the City of St. Louis and St. Louis County. In the City, 38% of households earn less than $25,000 per year whereas in the County, 19.5% of households earn less than $25,000. The disparity is even greater at the upper end of the income spectrum. For example, 24.6% of households in St. Louis County earn more than $100,000, compared to 9.7% in St. Louis City.

Income distribution has an impact on the demand for low income housing. This demand is especially high for minorities, as the graph below demonstrates the variance of household income between different races and ethnicities. African Americans and American Indians have a much higher percentage of the population living with very low incomes.



Disability

About 14% of the St. Louis City population has some disability, exceeding the percentage in St. Louis County (11%) (2009 ACS). Of the working age population, about 13% are disabled, well above St. Louis County's 9% population of working-age disabled persons. There is an even larger discrepancy when comparing the population over 65. The estimated number of disabled elders soars to almost 44% of all elderly persons in the City, compared to 33% in the County. This creates a large challenge for the municipality to address the needs of an older population that shows significant rates of disability. The AI includes the table below.

Table 12
Disabled Population

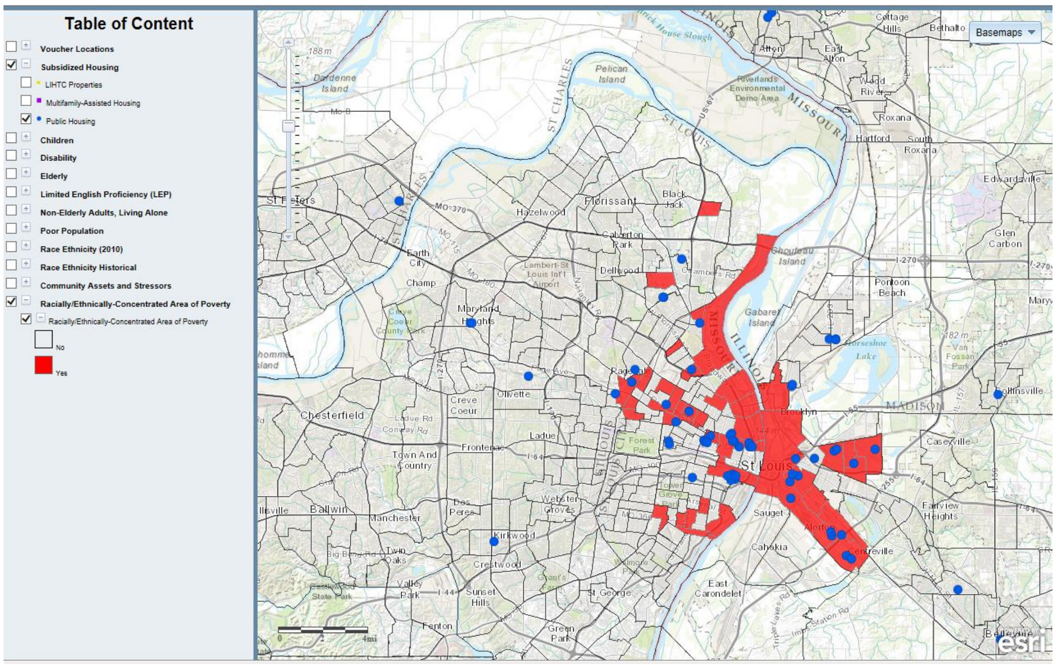
	Disabled Population from 18 to 64	Disabled Population 65 and Over
With any disability	13.4%	43.7%
With a hearing disability	1.6%	13.3%
With a vision disability	2.3%	8.7%
With a cognitive disability	6.8%	10.7%
With an ambulatory disability	7.2%	30.0%
With a self-care disability	2.7%	11.5%
With an independent living disability	5.1%	21.9%

It should be noted that neither the City's AI nor the American Community's Survey correlates disability and income, so it is difficult to determine the number of persons with a disability that qualifies for SLHA programs.

2. Analysis of Racially and Ethnically Concentrated Areas of Poverty in SLHA Programs

<u>Public Housing</u>

SLHA currently has 2,852 units of public housing. As SLHA's jurisdiction for public housing is only the City of St. Louis, the analysis includes only the City. The distribution of the units, as it relates to racially and ethnically concentrated areas of poverty, are shown on the map below.



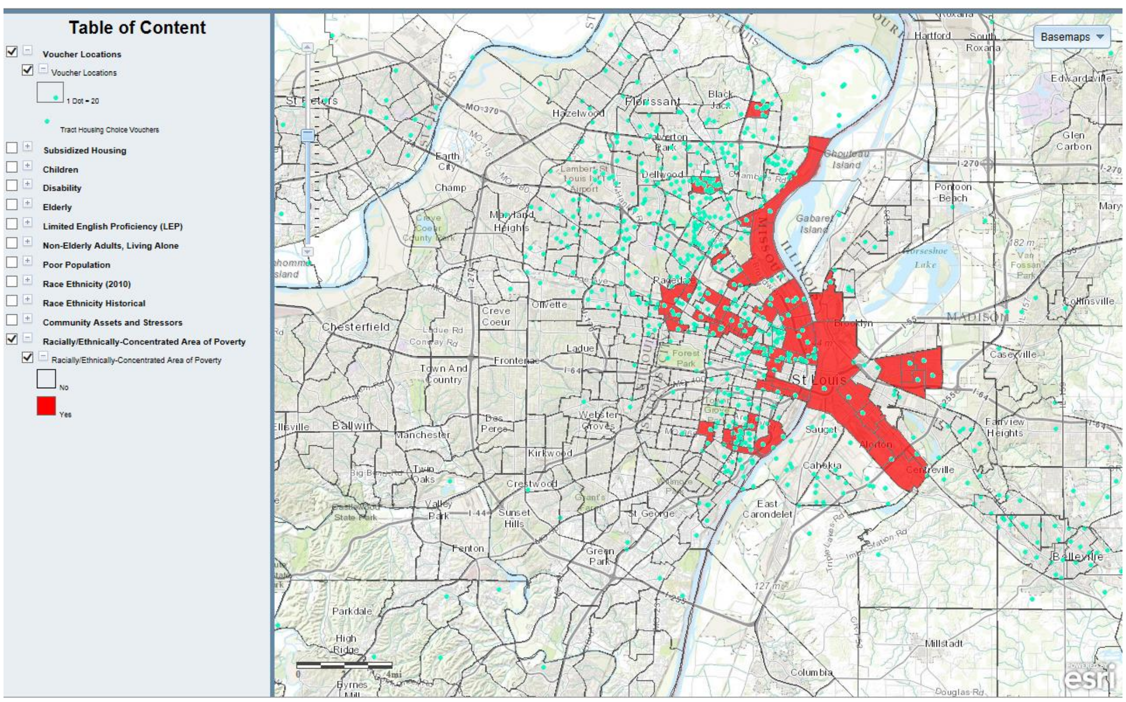
Of the 2,852 public housing units, 1,065 or 37% of the units are located outside census tracts identified as racially and ethnically concentrated areas of poverty and 1,787 or 63% of the units are located in census tracts racially and ethnically concentrated areas of poverty. Of the 1,787 units located in census tracts racially and ethnically concentrated areas of poverty, 693 or 24% of the units are located in mixed-finance/mixed-income developments.

Since 1999, SLHA has steadily worked to reduce the number of public housing units in racially and ethnically concentrated areas of poverty. In 1999, 78% of the public housing units were located in census tracts racially and ethnically concentrated areas of poverty. Since that time, SLHA has demolished or disposed of 2,702 public housing units. Of those units, 2,575 were located in census tracts racially and ethnically concentrated areas of poverty. In 15 years, there has been a 15% reduction in units located in census tracts racially and ethnically concentrated areas of poverty. SLHA's Agency Plan has goals to continue to develop additional housing using the mixed finance method and to remove an additional 143 public housing units that are located in a census tract that is a racially and ethnically concentrated area of poverty.

Housing Choice Vouchers

As of March 31, 2013, 6,739 vouchers were allocated to SLHA's HCV program. Of the allocated vouchers, 6,425 are currently leased. The utilization rate for the program is 101%. As the HCV program is budget based, SLHA must cease HCV lease-up until additional funding is available. Because of the mandatory federal budget cuts, SLHA estimates that by December 2013, 300 fewer families will be receiving HCV assistance. Further, if the 2014 appropriation levels remain at 2013 levels, an additional 300 households will be eliminated from the HCV program.

Unlike public housing, SLHA's jurisdiction for HCV is not limited to St. Louis City. SLHA participates in a regional approach to the HCV program. The Housing Authority of St. Louis County also has a large HCV program. For many years, program participants of both housing authorities have been allowed to use their voucher in either the City or the County. This gives SLHA's HCV participants a much broader range of choices of housing areas. The distribution of the units, as it relates to racially and ethnically concentrated areas of poverty, are shown on the map below.



As the map indicates, many vouchers are currently utilized outside of racially and ethnically concentrated areas of poverty. An analysis shows that 3,095 of SLHA's vouchers are located in the County and 3,330 are located in the City. Of these vouchers, 1,593 or 24.79% are located in a racially and ethnically concentrated area of poverty. The concentration in the County is very low, with only 182 or 5.88% located in racially and ethnically concentrated areas of poverty. In the City, 1,411 vouchers or 42.73% are located in racially and ethnically concentrated areas of poverty.

The data shows that SLHA's agreement with the County is effective in reducing racially and ethnically concentrated areas of poverty.

However, SLHA's ability to continue its deconcentration efforts is severely impacted by mandatory budget cuts. To allow families the maximum mobility, SLHA has for many years adopted the highest allowable payment standard. Unfortunately, in the current Agency Plan, the requirements of mandatory federal budget cuts, known as sequestration, have forced SLHA to reduce its payment standard to close to the minimum allowable. This limits a family's choice in housing, often forcing families to older, less desirable areas with less costly housing. These are areas more likely to be racially and ethnically concentrated areas of poverty. If the 2014 appropriation levels remain at 2013 levels, SLHA will be forced to keep the lower HCV payment levels in place to continue serving as many tenants as possible, leaving families fewer choices, but with some housing assistance rather than none.

3. Housing Needs Across Protected Classes

The City's AI includes an Affordable Housing Needs table that analyzes income and rental data to determine the need for housing. The table reflects a great need for housing for the poorest residents and an over-supply of housing at the upper end of the cost spectrum.

Income	Households	Monthly Housing Costs	Number of Units	Net
Less than $10,000	21,028	Less than $300	12,016	-9,012
$10,000 - 14,999	12,445	$300 - 399	10,585	-1,860
$15,000 - 24,999	20,885	$400 - 599	29,038	8,154
$25,000 - 34,999	18,310	$600 - 799	27,608	9,298

The AI goes on to state that there are 37,103 extremely low-income households, with incomes at or below 30% of the area median income, in the City of St. Louis. More than 70% of extremely low-income households have one or more housing problems, such as cost burden, overcrowding and/or incomplete kitchen or plumbing facilities. The primary housing problem for this group is cost burden. The majority of these households are paying more than 30% of their household income for housing.

The AI identifies that there are 24,288 low-income households, with incomes between 30% and 50% of the area median income, in the City of St. Louis. About half of low-income households have some sort of housing problem. Almost 44% of these households are paying more than 30% of their household income for housing and almost 11% are paying more than 50% of their household income for housing. The AI also states that there are 30,686 moderate-income households, with incomes between 50% and 80% of the area median income, in the City of St. Louis. Approximately 16% of these households are paying more than 30% of their household income for housing.

As the demographic information for the area shows, African-Americans and American Indians have a much higher percentage of the population living with very low incomes than other racial/ethnic groups. Therefore, the need is greatest among the African American and American Indian protected classes.

The AI for the City of St. Louis indicates that there is also a need for units with accessible features for persons with disabilities for the elderly and a smaller need for large families. SLHA's data indicates that the need for elderly housing is not as strong as the AI indicates because SLHA does not see the demand for elderly housing.

SLHA has four developments that are designated elderly only. While each has a waiting list, the lists are relatively short and always remain open. All of SLHA's other waiting lists are extremely long and most are closed. When they open, they generally open for very short periods of time and receive hundreds, sometimes thousands of applications. This leads SLHA to conclude that the need for elderly housing is being provided by the private market, limiting the demand on SLHA's units.

IV. Identify Any Impediments to Fair Housing Choice Within SLHA's Programs

As with the requirement for a PHA to examine its programs, there is very little HUD guidance on how a PHA is to identify the impediments to fair housing choice within its programs in order to satisfy the requirements of 24 CFR 903.7(o)(3)(ii). HUD's website states that PHAs may conduct their own AI or ensure their annual PHA Plans are consistent with the applicable jurisdiction's Consolidated Plan and AIs. As SLHA has extremely limited resources, it has chosen to use the AI performed by the City of St. Louis. As stated above, the City's AI was completed in March 2012, but is yet to be approved by HUD. The impediments to fair housing choice identified in the City's draft AI are as follows:

1. There are not enough rent-assisted units to meet the demand.

2. Residents often oppose the location of housing for protected classes in or near their neighborhoods, including rezoning for group homes for residents who are disabled.

3. The largest concentration of affordable housing units is located in areas that lack jobs and have schools that underperform.

4. Information about fair housing enforcement is not universally known to organizations working with people in protected classes.

5. Continuing uncertainty regarding the General Assembly's commitment to funding tax credit programs used to fund low-income housing construction and rehabilitation is leading to uncertainty in the public and private sectors about the future availability of these resources in the production of affordable housing.

6. There is a lack of a centralized method for distributing Community Development Block Grant (CDBG) funds to meet housing needs.

7. Occupancy permit requirements are unevenly applied across the City of St. Louis.

8. Real Estate Agents do not provide enough information about the amenities of the City of St. Louis to customers who want information about where to locate.

9. There has been a constriction in access to credit for low-income and minority borrowers.

10. Accessible housing units are not often available to people with disabilities.

Clearly, some of the impediments identified in the City's AI do not relate to SLHA programs. SLHA is not responsible for administration of the LIHTC program. Therefore, SLHA has little ability to impact Impediment 4. SLHA is not involved in the City's administration of the Community Development Block Grant (CDBG). Therefore, Impediment 6, which identifies the method of distribution of CDBG funds, is not relevant to SLHA. SLHA is not a real estate agent or a lender. Therefore, Impediments 8 and 9, which identify issues with information provided by real estate agents and issues with the availability of credit to low-income and minority buyers, are not relevant to SLHA. Instead, Impediments 1, 2, 3, 5, 7 and 10 are the only Impediments relevant to SLHA.

V. Address Those Impediments in a Reasonable Fashion in View of the Resources Available

To address the impediments in a reasonable fashion, each relevant impediment is addressed separately.

1. Impediment 1

Impediment: There are not enough rent-assisted units to meet the demand.

Impact: Many low-income residents have less access to quality housing.

Analysis: The analysis in the City's Draft AI states that there are 78,148 renter households in the City, 37% of which are cost burdened and 20% of which are severely cost burdened. When looking at extremely low-income, low-income, and moderate income households, the situation is more dire. Approximately 73% of extremely low-income households, 49% of low-income households, and 22% of moderate-income households have one or more housing problems. The primary housing problem in each group is cost burden.

As of March 31, 2013, SLHA was assisting about 9,371 households, with over 15,000 families on the waiting list for public housing and for Housing Choice Vouchers (HCV). In September of 2000, SLHA was assisting 7,150 households. In the past 12 years, SLHA has increased the number of households served by 31% or over 2,200 households. According to the City's AI, even with this level of assistance, there are still approximately 20,000 households in need of such assistance that do not receive it.

SLHA's Agency Plan recognizes the need for more affordable housing. One of the SLHA goals is to increase the supply of affordable housing by building an additional 120 public housing units and obtaining an additional 250 Housing Choice Vouchers. However, the implementation of mandatory federal budget cuts, known as sequestration, may prevent SLHA from reaching its goal. The effects of sequestration have been particularly devastating to the HCV program. Because of the budget cuts, SLHA estimates that by December 2013, 300 fewer families will be receiving HCV assistance. Further, if the 2014 appropriation levels remain at 2013 levels, an additional 300 households will be eliminated from the HCV program. While SLHA will make every effort to increase the supply of affordable housing, lack of funding from HUD may prevent SLHA from serving additional households.

2. Impediment 2

Impediment: Residents often oppose the location of housing for protected classes in or near their neighborhoods, including rezoning for group homes for residents who are disabled.

Impact**:** Resident resistance may influence policy makers who might otherwise support housing development for protected classes. Resistant resident successes may lead to a perceived sanctioning of residents who have negative attitudes toward protected classes and perpetuates an unwelcoming environment

Analysis: As the City's AI states, NIMBY is an acronym standing for Not In My Back Yard. NIMBYism, as it is known, is the opposition of residents to developments in their neighborhood that putatively cause crime, lower property values, or generally have a negative effect. The name derives from the fact that many NIMBYs do not necessarily object to the proposed development; they object to its location near their home (i.e., "not in their backyard"). NIMBYism is often used in the context of dangerous or unwanted land uses, such as environmental hazards, in addition to social concerns, such as low income or transitional housing. It is commonly referred to as a problem in public policy and development circles due to the fact that NIMBYs are often opposed to such land uses on principle without considering any facts or additional information about the development in question.

The City's AI goes on to state that in order to find the most affordable developable parcels and encounter the least NIMBY-related resistance in the community, developers often locate affordable housing projects in areas that are severely impacted with respect to poverty. The AI goes on to recommend that potential NIMBYism issues should be addressed in the planning process of a development. The AI concludes that negative attitudes regarding affordable housing should be addressed with better information about successful housing initiatives and by including the residents in planning for affordable housing initiatives, which would include their input and concerns and provide a means to get quality information to the neighbors before rumors and innuendos can overcome a development.

SLHA's Agency Plan includes a goal to increase awareness and understanding of programs, services and successes. As part of this strategic goal, SLHA has an objective to develop a community education program. The purpose of the community education program is to provide information to the SLHA clients, vendors, stakeholders and the general public about successful SLHA housing initiatives and to break down negative stereotypes about subsidized housing. In addition, in all new developments, SLHA requires the developer to engage the community and obtain community input in the planning process.

3. Impediment 3

Impediment: The largest concentration of affordable housing units is located in areas that lack jobs and have schools that underperform.

Impact: Steady employment is difficult to find and maintain for protected class members with few resources. It is difficult for families in protected classes to find affordable housing and obtain quality education for their children.

Analysis: The City's AI states that most of the current development of low-income housing is developed by private developers with LIHTC financing and with partial financing through the Affordable Housing Commission or the Community Development Agency. Since private developers initiate the process, site selection is more about ease of obtaining the land at a cost that the project can support and avoiding problems with the neighborhood. Another factor that should be considered is that funding sources favor investment in distressed communities. Affordable housing developments provide jobs and stability in neighborhoods that would have little investment, if not for public investment. The AI states that this practice has led to the creation of an area that is defined by poverty.

The AI goes on to recommend that the City set goals to encourage developers to choose sites in less poverty impacted areas, increase regional planning to distribute

low-income housing to areas with good jobs and transportation, and encourage creative partnerships that will invest in low income areas of the City.
The AI concludes that large scale interventions, with guidelines for mix-income housing and universal design, may offer the best hope for revitalization for largely depleted neighborhoods with a high percentage of vacant land.

SLHA's Agency Plan goal for increasing the supply of affordable housing using the mixed-finance method of development is consistent with the recommendations in the AI. SLHA's strategy focuses on revitalizing entire neighborhoods using public and private resources as a catalyst to bring more redevelopment and economic opportunities to the areas. This creates the large scale intervention that the AI recommends.

SLHA, in partnership with the City and private developers, has completed developments using this revitalization strategy in four neighborhoods in the City. In all those neighborhoods, the strategy has resulted in substantial private investments and positive change in the economic composition of the area. For example, the revitalization of the Near South Side (formerly known as Darst-Webbe) has resulted in over $100 million of private investment in the area. As a result of the revitalization, retail and commercial businesses have returned to an area that had seen many decades of disinvestment. The economic composition of the residents has changed, with a mix of public housing residents and market rate residents. Renaissance Place at Grand (formerly Blumeyer) has seen the same results, with private investments of over $63 million and an increase in average income of 40**%**.

Unlike a purely private development, SLHA and its development partners very carefully consider the location of the developments, as they relate to jobs and transportation. Five of the six neighborhoods where revitalization is complete or underway are located near major employment centers. Two are immediately adjacent to downtown, with a third less than half a mile from downtown. Two others are located in mid-town, adjacent to the arts district, a major university and a large VA medical center, all potential sources of employment. All the developments are located on bus lines, giving the residents access to public transportation. In addition, there is a wide variety of social, recreational, educational and health care facilities located near each of the neighborhoods.

Consistent with the recommendations of the AI, SLHA has used a variety of very creative partnerships to bring investment to low-income areas. SLHA and its development partners used New Market Tax Credits and Empowerment Zone funds to build a new office building for SLHA, which contains a bank and a coffee shop in the Renaissance Grand neighborhood. The group also used New Market Tax Credits and public housing community facilities funds to build a new early childhood education center that will serve the communities on the near north side of downtown. When complete, the facility will provide 156 children with a high level of early childhood education.

The AI also recommends increasing regional planning to disburse low-income housing. SLHA's jurisdiction for new development of affordable housing includes only the City of St. Louis. While SLHA agrees that there should be increased regional planning, SLHA cannot build affordable housing outside its jurisdiction. However, SLHA participates in a regional approach to the HCV program. The Housing Authority of St. Louis County also has a large HCV program. For many years, program participants of both housing authorities have been allowed to use their voucher in either the City or the County. This gives SLHA's HCV participants a much broader range of housing areas. For many years, SLHA adopted the highest allowable payment standard to facilitate the broadest range of housing choice possible.

Unfortunately, in the current Agency Plan, the requirements of mandatory federal budget cuts, known as sequestration, have forced SLHA to reduce its payment standard to close to the minimum allowable. This limits families' choices in housing, often forcing families to older, less desirable areas. These are the areas that are most likely to have a concentration of poverty. If the 2014 appropriation levels remain at 2013 levels, SLHA will be forced to keep the lower levels in place, leaving families with fewer choices. In a choice between continuing to provide assistance to current participants or providing families the maximum amount of choice in housing areas, SLHA opted for providing assistance to current participants. If the program is ever fully funded, SLHA will have to determine if it wants to assist more families or give current participants more choices.

The AI claims that the location of the majority of the low-income housing prevents residents from obtaining quality education for their children. It should also be noted that while the public schools in the City of St. Louis are generally low performing, there is a variety of educational choices for children to attend better schools. All students in the City have the option of applying to attend a magnet or charter school. These schools generally perform at a higher level than the traditional public schools. In addition, the children have the option of participating in the Voluntary Inter-district Choice program. This program will allow children to attend schools in the Parkway, Rockwood or Clayton school district. These school districts are all much higher performing districts than the City of St. Louis. These educational choices give residents access to educational facilities that are at least equivalent to the choices in non-impacted areas.

4. Impediment 4

Impediment: Information about fair housing enforcement is not universally known to organizations working with people in protected classes.

Impact: Fair Housing complaints may be under-reported.

Analysis: Information about fair housing enforcement is well known to SLHA. Through both its HCV Administrative Plan and public housing ACOP, SLHA makes every attempt to provide its stakeholders with the necessary information about fair housing enforcement.

The HCV Administrative Plan requires SLHA to take steps to ensure that families and owners are aware of applicable equal opportunity laws. As part of every family's oral briefing process, SLHA reviews information with HCV applicant families about equal opportunity requirements and the opportunity to rent in a broad range of neighborhoods. All applicable Fair Housing information and discrimination complaint forms are part of the voucher holder's briefing packet and available upon request. The owners' briefing includes information regarding Fair Housing requirements. In addition, the Housing Assistance Payments (HAP) contract, which all owners must sign to participate in the program, contains provisions that prohibit the owner from discriminating against any person because of race, color, religion, sex, national origin, age, familial status, sexual orientation, gender identity or disability.

SLHA's ACOP requires SLHA to take steps to inform public housing residents of all applicable civil rights laws. As part of the public housing orientation process, SLHA will provide information to public housing applicants about civil rights requirements. The ACOP further provides that if an applicant or resident advises SLHA that they believe that any family member has been discriminated against, SLHA will provide a copy of a discrimination complaint form to the complainant and provide the family with information on how to complete and submit the form to HUD's Office of Fair Housing and Equal Opportunity (FHEO).

SLHA provides training, coordinated through HUD's Office of Fair Housing and Equal Opportunity (FHEO), to the HCV staff and the management agents' staff at least annually. The purpose of the training is to make sure the staff is aware of their obligations complying with fair housing requirements.

5. **Impediment 7**

Impediment: Occupancy permit requirements are unevenly applied across the City of St. Louis.

Impact: Tenants are renting properties that lack occupancy permits.

Analysis: The City's AI states that occupancy permits are one way that a municipality can protect the residents. They help control the quality of housing and limit overcrowding. Another benefit to occupancy permits is that tenants gain some leverage to have residences brought up to code and made safer before occupying these dwellings. The AI goes on to state that occupancy permits have a positive impact on fair housing.

While SLHA does not have the authority to issue occupancy permits, both the HCV and public housing programs have initial and annual inspection requirements and both programs have strict occupancy standards to prevent overcrowding. The annual inspection requirements review property quality much more often than an occupancy permit, which only requires an inspection at initial occupancy. SLHA inspection and occupancy standards remove this impediment to fair housing for participants in SLHA programs.

6. Impediment 10

Impediment: Accessible housing units are not often available to people with disabilities.

Impact: Persons with disabilities needing accessible housing do not have free and equal access to housing.

Analysis: The City's AI states that there is a great need for accessible housing in the City of St. Louis. An estimated 14% of the population has a disability and 7.2% has an ambulatory disability. When looking at just the senior population of the City, approximately 44% have a disability and 30% have an ambulatory disability. This is a large population of residents who have a disability when compared to St. Louis County, where 9% of the population are residents with disabilities.

SLHA fully complies with the requirements of Section 504 and has more than the required number of accessible units. Of SLHA's current inventory of 2,852 units, 7.89% of the units are accessible for individuals with mobility impairment and 3.23% of the units are accessible for individuals with hearing and visual impairments. A list of SLHA's current units is provided in Appendix B.

In addition, the inventory includes four developments designed for elderly families. These developments were all designed using the principles of universal design. Some of the universal design features that are included are: adequate clearances in front of each appliance and working surfaces, faucets with single lever handles and shallow bowls, slip resistant smooth surface flooring and low pile carpet, lever door handles instead of door knobs, adjustable height closet rods, view windows with 36" or less sill height, mirror to backsplash behind bathroom sink, mixer valve with pressure balance and hot water limiter, electrical outlets, light switches and thermostats at accessible heights.

All ground floor units and elevator units are adaptable designed. This design includes: accessible building entrance on an accessible route, accessible common and public use area, usable doors, accessible route into and through a unit, accessible environmental controls, reinforced bathroom walls for grab bars and usable kitchens and bathrooms.

In addition, to the extent practical all entry doors and interior corridors are no less than 3'-0'' wide and all interior doors are no less than 2'-10" wide, allowing 32" of clear passage space.

The more recent family developments at Arlington Grove and North Sarah also are designed using universal design principles, as well as meeting all the requirements of Section 504 and the Fair Housing Act. SLHA exceeds its requirements for accessible units and houses a large number of disabled families. The developments proposed in SLHA's Agency Plan will add to the supply of accessible units. In addition, SLHA's Agency Plan commits to applying for Non-Elderly Disabled ("NED") vouchers from HUD, if funding is available and it can identify a viable community partner.

Unfortunately, as with SLHA's goal to increase the supply of affordable housing, the implementation of mandatory federal budget cuts, known as sequestration, may prevent SLHA from being able to increase the supply of additional accessible units. If the 2014 appropriation levels remain at 2013 levels, there will likely not be funds available for NED vouchers or additional public housing units.

VI. Work with Local Jurisdictions to Implement Any of the Jurisdiction's Initiatives to Affirmatively Further Fair Housing that Require PHA Involvement

SLHA works closely with the various City development agencies, including the Community Development Agency, the Planning and Urban Design Agency, the St. Louis Development Corporation and the Affordable Housing Trust. SLHA participates in the City's Consolidated Plan process and the City verifies that SLHA's Agency Plan is consistent with the Consolidated Plan. The Planning and Urban Design Agency and the City's Department of Human Services were members of the SLHA Strategic Planning Committee that defined the goals and objectives presented in the Agency Plan. While the City's AI does not identify any jurisdictional initiatives that specifically require SLHA's involvement, as identified with each impediment discussed in Section V of this document, SLHA's Agency Plan and policies contain actions that will assist in reducing some of the impediments and affirmatively furthering fair housing.

VII. Maintain Records Reflecting These Analyses and Actions

This document will serve as the record of SLHA's completion of the analysis requirements of 24 CFR §903.7 (o). As a further record of its actions, SLHA will update the goals and objectives in the annual Agency Plan to document the progress on achieving the stated goals.

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V			
MO1-2	MO1-020	***Clinton-Peabody***	***1942***	***358***	***0***	***52***	***159***	***125***	***14***	***8***	***0***	***0***	No	***3.8***	***2***	***11***	***12***							
		1002 Dillon				1											1							
		1234 Dillon				1											1							
		1302 Dillon				1											1							
		1136 Dillon					1									1								
		1517 Lasalle				1										1								
		1414 Lasalle						1								1								
		1462 Kealty					1									1								
		1400 Morrison				1											1							
		1416 Morrison						1								1								
		1424 Morrison					1									1								
		1440 Morrison				1											1							
		1401 Rutger				1											1							
		1411 Rutger						1								1								
		1425 Rutger					1									1								
		1441 Rutger				1											1							
		1474 Hickory						1								1								
		1400 Peabody				1											1							
		1432 Peabody				1											1							
		1434 Peabody				1											1							
		1465 Lasalle								1							1							
		1440 Castle					1									1								
		1245 S. 14TH					1										1							
		1408 Chouteau						1								1								
	Totals	**Clinton-Peabody**				**11**	**6**	**5**	**0**	**1**	**0**	**0**				**11**	**12**					**195**	**18**	
MO1-10	MO1-100	***James House***	***1970***	***126***	***9***	***117***	***0***	***0***	***0***	***0***	***0***	***0***	No	***5***	***2***	***9***	***3***							
		4310 S. FERDINAND																						
		UNIT 213				1										1								
		UNIT 313				1										1								
		UNIT 413				1										1								
		UNIT 513				1										1								
		UNIT 613				1										1								
		UNIT 713				1										1								
		UNIT 813				1										1								
		UNIT 913				1										1								
		UNIT 1013				1										1								
		UNIT 207				1											1							
		UNIT 307				1											1							
		UNIT 407				1											1							Rehab Comp 7-2012
	Totals	**James House**				**12**	**0**	**0**	**0**	**0**	**0**	**0**				**9**	**3**					**40**	**5**	
MO1-13B	MO1-132	***Euclid Plaza Elderly***	***1973***	***108***	***10***	***95***	***3***	***0***	***0***	***0***	***0***	***0***	No	***3.8***	***2***	***10***	***0***							
		5310 N. EUCLID																						
		UNIT 214				1										1								
		UNIT 308				1										1								
		UNIT 416				1										1								
		UNIT 509				1										1								

Accessible Units Under ACC

HUD Project #	SLHA MO #	Development	DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required M	% Units Required H/V	# Of Units Existing M	# Of Units Existing H/V	# Of Units under const M	# Of Units under const H/V	# Of Units Planned M	# Of Units Planned H/V	# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments
		UNIT 616				1										1								
		UNIT 709				1										1								
		UNIT 816				1										1								
		UNIT 201				1										1								
		UNIT 307				1										1								
		UNIT 401				1										1								
	Totals	**Euclid Plaza Elderly**				**10**	**0**	**0**	**0**	**0**	**0**	**0**				**10**	**0**					**52**	**5**	
MO1-15	**MO1-150**	***Towne XV***	***1971***	***8***	***0***	***0***	***8***				***0***	***0***	No	***3.8***	***2***	***2***	***0***							
		1070 Hodiamont					1									1								
		1074 Hodiamont					1									1								
		1064 Hamilton					1										1							
		1060 Hamilton					1										1							
	Totals	**Towne XV**				**0**	**4**	**0**	**0**	**0**	**0**	**0**				**2**	**2**					**14**	**1**	
MO1-16	**MO1-160**	***McMillian Manor***	***1972***	***20***	***0***	***0***	***0***	***10***	***10***	***0***	***0***	***0***	No	***3.8***	***2***	***0***	***0***					26	2	
MO1-17	**MO1-170**	***West Pine***	***1971***	***99***	***0***	***94***	***5***	***0***	***0***	***0***	***0***	***0***	Yes, 2004	***3.8***	***2***	***12***	***9***							
		4490 WEST PINE																						
		UNIT 207				1											*1*							
		UNIT 307				1											1							
		UNIT 407				1											1							
		UNIT 507				1											1							
		UNIT 607				1											1							
		UNIT 707				1											1							
		UNIT 807				1											1							
		UNIT 907				1											1							
		UNIT 1007				1											1							
		UNIT 201				1										1								
		UNIT 206				1										1								
		UNIT 306				1										1								
		UNIT 406				1										1								
		UNIT 506				1										1								
		UNIT 606				1										1								
		UNIT 706				1										1								
		UNIT 806				1										1								
		UNIT 906				1										1								
		UNIT 1006				1										1								
		UNIT 214					1									1								
		UNIT 414					1									1								
	Totals	**West Pine**				**19**	**2**									**12**	**9**					**38**	**2**	
MO1-18	**MO1-180**	***Kingsbury Terrace***	***1971***	***120***	***0***	***110***	***10***	***0***	***0***	***0***	***0***	***0***	No	***3.8***	***2***	***10***	***3***							
		5655 KINGSBURY																						
		UNIT 201				1										1								
		UNIT 202					1									1								
		UNIT 301				1										1								
		UNIT 401				1										1								
		UNIT 501				1										1								
		UNIT 601				1										1								

Accessible Units Under ACC

HUD Project #	SLHA MO #	Development	DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments
														M	**H/V**	**M**	**H/V**	**M**	**H/V**	**M**	**H/V**			
		UNIT 701				1										1								
		UNIT 801				1										1								
		UNIT 901				1										1								
		UNIT 1001				1										1								
		UNIT 208				1											1							
		UNIT 308				1											1							
		UNIT 303					1										1							Rehab Comp 4-2009
	Totals	**Kingsbury Terrace**			**0**	**11**										**10**	**3**					**29**	**5**	
MO1-19	**MO1-190**	***Parkview Elderly***	***1972***	***295***	***7***	***288***	***0***	***0***	***0***	***0***	***0***	***0***	Yes, 2003	***3.8***	***2***	***48***	***20***							
		4451 FOREST PARK																						
		UNIT 201				1										1								
		UNIT 202				1										1								
		UNIT 301				1										1								
		UNIT 302				1										1								
		UNIT 401				1										1								
		UNIT 402				1										1								
		UNIT 501				1										1								
		UNIT 502				1										1								
		UNIT 601				1										1								
		UNIT 602				1										1								
		UNIT 701				1										1								
		UNIT 702				1										1								
		UNIT 801				1										1								
		UNIT 802				1										1								
		UNIT 901				1										1								
		UNIT 902				1										1								
		UNIT 1001				1										1								
		UNIT 1002				1										1								
		UNIT 1101				1										1								
		UNIT 1102				1										1								
		UNIT 1201				1										1								
		UNIT 1202				1										1								
		UNIT 1401				1										1								
		UNIT 1402				1										1								
		UNIT 223				1										1								
		UNIT 323				1										1								
		UNIT 423				1										1								
		UNIT 523				1										1								
		UNIT 623				1										1								
		UNIT 723				1										1								
		UNIT 823				1										1								
		UNIT 923				1										1								
		UNIT 1023				1										1								
		UNIT 1123				1										1								
		UNIT 1223				1										1								
		UNIT 1423				1										1								

Accessible Units Under ACC HUD Project #	SLHA MO #	Development	DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required M	% Units Required H/V	# Of Units Existing M	# Of Units Existing H/V	# Of Units under const M	# Of Units under const H/V	# Of Units Planned M	# Of Units Planned H/V	# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments
		UNIT 224				1										1								
		UNIT 324				1										1								
		UNIT 424				1										1								
		UNIT 524				1										1								
		UNIT 624				1										1								
		UNIT 724				1										1								
		UNIT 824				1										1								
		UNIT 924				1										1								
		UNIT 1024				1										1								
		UNIT 1124				1										1								
		UNIT 1224				1										1								
		UNIT 1424				1										1								
		UNIT 604				1											1							
		UNIT 704				1											1							
		UNIT 804				1											1							
		UNIT 904				1											1							
		UNIT 1004				1											1							
		UNIT 1104				1											1							
		UNIT 1204				1											1							
		UNIT 1404				1											1							
		UNIT 214				1											1							
		UNIT 314				1											1							
		UNIT 414				1											1							
		UNIT 514				1											1							
		UNIT 614				1											1							
		UNIT 714				1											1							
		UNIT 814				1											1							
		UNIT 914				1											1							
		UNIT 1014				1											1							
		UNIT 1114				1											1							
		UNIT 1214				1											1							
		UNIT 1414				1											1							
	Totals	**Parkview Elderly**				**68**										**48**	**20**					**97**	**4**	
MO1-22	**MO1-220**	***Lafayette Elderly***	***1971***	***26***	***8***	***18***	***0***	***0***	***0***	***0***	***0***	***0***	No	***3.8***	***2***	***1***	***0***							
		UNIT 106				1										*1*								
	Totals	**Lafayette Elderly**				**1**										**1**	**0**					**16**	**1**	
MO1-23	**MO1-230**	***California Gardens***	***1971***	***28***	***16***	***12***	***0***	***0***	***0***	***0***	***0***	***0***	No	***3.8***	***2***	***0***	***0***							
MO1-26	**MO1-260**	***Page Manor***	***1982***	***10***	***0***	***0***	***0***	***6***	***4***	***0***	***0***	***0***	No	***3.8***	***2***	***0***	***0***					13	9	2-story townhouses
MO1-28	**MO1-280**	***Badenhaus Elderly***	***1974***	***100***	***52***	***48***	***0***	***0***	***0***	***0***	***0***	***0***	No	***3.8***	***2***	***8***	***4***							
		8450 GAST PLACE																						
		UNIT 163			1												1							
		UNIT 257				1											1							
		UNIT 261			1											1								
		UNIT 273			1											1								
		UNIT 353				1										1								
		UNIT 357				1										1								

Accessible Units Under ACC

HUD Project #	SLHA MO #	Development	DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required M	% Units Required H/V	# Of Units Existing M	# Of Units Existing H/V	# Of Units under const M	# Of Units under const H/V	# Of Units Planned M	# Of Units Planned H/V	# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments
		UNIT 437				1										1								
		UNIT 337			1											1								
		UNIT 175			1											1								
		UNIT 177			1											1								
		UNIT 184			1												1							
		UNIT 186			1												1							
	Totals	**Badenhaus Elderly**			**8**	**4**										**8**	**4**					**43**	**14**	
MO1-34	**MO1-340**	***LaSalle Park***	***1976***	***148***	***0***	***0***	***30***	***79***	***39***	***0***	***0***	***0***	No	***3.8***	***2***	***8***	***3***							
		1013 Hickory					1									1								
		1029Hickory					1									1								
		922 LASALLE					1									1								
		1021 Lasalle					1										1							
		1034 Lasalle					1									1								
		1120 South11TH							1								1							
		1026 Hickory					1									1								
		1015 Morrison						1								1								
		927 Hickory					1									1								
		923 Hickory							1							1								
		1221 10TH						1									1							
	Totals	**LaSalle Park**				**0**	**7**	**2**	**2**							**8**	**3**					**147**	**9**	
MO1-35	**MO1-350**	***Armand & Ohio***	***1982***	***4***	***0***	***0***	***0***	***3***	***0***	***1***	***0***	***0***	Yes, 2004	***3.8***	***2***	***0***	***0***					4	0	
MO1-37	**MO1-370**	***Cochran Plaza***	***1982***	***78***	***0***	***0***	***15***	***41***	***12***	***4***	***6***	***0***	No	***3.8***	***2***	***0***	***0***					106	12	
		912 Cass					1									1	1							
		1413 N. 9th					1									1								
		911 Manhattan Place					1									1								
		1416 N. 10th							1							1								
		910 Manhattan Place						1								1								
		909 Ofallon					1									1	1							
	Totals	**Cochran Plaza**					**4**	**1**	**1**							**6**	**2**			**0**		**87**	**6**	
MO1-38	**MO1-380**	***Folsom***	***1983***	***6***	***0***	***0***	***2***	***2***	***2***	***0***	***0***	***0***	No	***3.8***	***2***	***3***	***1***							2-story townhouses
		3919 Folsom #. 1A							1							1								
		3919 Folsom #. 1B					1									1								
		3919 Folsom #. 1E						1								1								
		3919 Folsom #. 2F						1									1							
	Totals	**Folsom**					**1**	**2**	**1**							**3**	**1**					**5**	**1**	
MO1-38	**MO1-381**	***Samuel Shepard***	***1982***	***16***	***0***	***0***	***4***	***4***	***8***	***0***	***0***	***0***	No	***3.8***	***2***	***4***	***2***							
		2906 Samuel Shepard Unit. 1B						1								1								
		2906 Samuel Shepard Unit. 1E					1									1								
		2926 Samuel Shepard Unit. 1B						1								1								
		2926 Samuel Shepard Unit. 1F							1							1								
		2906 Samuel Shepard Unit. 1A							1								1							

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V			
		2926 Samuel Shepard Unit. 1A							1								1							
	Totals	**Samuel Shepard**					**1**	**2**	**3**							**4**	**2**					**14**	**3**	
MO1-38	**MO1-382**	***Marie Fanger***	***1984***	***6***	***0***	***0***	***2***	***2***	***2***	***0***	***0***	***0***	No	***3.8***	***2***	***0***	***2***							
		4377 Norfolk # 1A							1								1							
		4377 Norfolk # 1E						1									1							
	Totals	**Marie Fanger**						**1**	**1**							**0**	**2**					**5**	**2**	
MO1-38	**MO1-383**	***Cupples***	***1984***	***4***	***0***	***0***	***0***	***2***	***2***	***0***	***0***	***0***	No	***3.8***	***2***	***1***	***1***							
		4704 Cupples # 1A							1							1								
		4704 Cupples # 2D						1									1							
	Totals	**Cupples**						**1**	**1**							**1**	**1**					**4**	**2**	
MO1-38	**MO1-384**	***Hodiamont***	***1982***	***22***	***0***	***0***	***4***	***8***	***10***	***0***	***0***	***0***	No	***3.8***	***2***	***4***	***4***							
		2521 Hodiamont # 1A							1							1								
		2521 Hodiamont # 1E						1								1								
		2521 Hodiamont # 2F						1									1							
		1949 Hodiamont # 1B						1								1								
		1949 Hodiamont # 2C							1								1							
		1949 Hodiamont # 2G						1									1							
		2505 Hodiamont # 2D						1									1							
		2505 Hodiamont # 1B						1								1								
	Totals	**Hodiamont**						**6**	**2**							**4**	**4**					**15**	**4**	
MO1-39	**MO1-390**	***Badenfest Elderly***	***1983***	***21***	***0***	***18***	***3***	***0***	***0***	***0***	***0***	***0***	No	***3.8***	***2***	***2***	***0***							
		8220 N. Broadway																						
		UNIT 201					1									1								
		UNIT 204				1										1								
	Totals	**Badenfest Elderly**				**1**	**1**									**2**	**0**					**5**	**2**	
MO1-41	**MO1-410**	***South Broadway***	***1984***	***10***	***0***	***0***	***0***	***10***	***0***	***0***	***0***	***0***	No	***3.8***	***2***	***0***	***0***							2-story townhouses
MO1-41	**MO1-411**	***Walnut Park***	***1982***	***13***	***0***	***0***	***0***	***8***	***1***	***4***	***0***	***0***	No	***3.8***	***2***	***3***	***1***							
		5519 Plover								1						1								
		5228 Gilmore						1								1								
		6030 Gareche						1								1								
		5205 Gilmore						1									1							
	Totals	**Walnut Park**						**3**		**1**						**3**	**1**					**13**	**4**	
MO1-41	**MO1-412**	***Lookaway***	***1982***	***17***	***0***	***0***	***0***	***7***	***10***	***0***	***0***	***0***	No	***3.8***	***2***	***0***	***0***							2-story townhouses
MO1-42	**MO1-420**	***Lafayette Townhomes***	***1985***	***38***	***0***	***18***	***16***	***4***	***0***	***0***	***0***	***0***	No	***3.8***	***2***	***0***	***0***							2-story townhouses
MO1-42	**MO1-421**	***Tiffany Turnkey***	***1982***	***25***	***0***	***19***	***6***	***0***	***0***	***0***	***0***	***0***	No	***3.8***	***2***	***0***	***0***							2-story townhouses
MO1-44	**MO1-440**	***Murphy Park I***	***1997***	***93***	***0***	***0***	***39***	***42***	***8***	***3***	***1***		No	***3.8***	***2***	***3***	***0***							
		1429 N. 19th St. # 101					1									*1*								
		1429 N. 19th St. #102					1									*1*								
		1931 Phipps #102					1									*1*								
	Totals	**Murphy Park I**					**3**	**0**								**3**	**0**							
MO1-45	**MO1-450**	***Murphy Park II***	***2000***	***64***	***0***	***0***	***27***	***30***	***7***	***0***	***0***	***0***	No	***3.8***	***2***	***8***	***0***							
		2033 Howard St.						1								1								
		2035 Howard St.					1									1								
		2115 Howard St.						1								1								

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V			
		1018 N. 19th St.					1									1								
		1022 N. 19th St.						1								1								
		1017 N. 18th St.					1									1								
		1021 N. 18th St.						1								1								
		1005 N. 18th St.						1								1								
	Totals	**Murphy Park II**					**3**	**5**								**8**	**0**							
MO1-46	**MO1-460**	***Murphy Park III***	**-**	***65***	***0***	***0***	***25***	***30***	***5***	***4***	***1***	***0***	No	***3.8***	***2***	***7***	***0***							
		1860B Mullanphy					1									1								
		2012B Mullanphy							1							1								
		2100A Mullanphy						1								1								
		2100C Mullanphy					1									1								
		2017A Mullanphy					1									1								
		2017B Mullanphy					1									1								
		2017C Mullanphy					1									1								
	Totals	**Murphy Park III**					**5**	**1**	**1**							**7**	**0**							
MO1-47	**MO1-470**	***King Louis Square***	***2002***	***36***	***0***	***8***	***22***	***4***	***2***	***0***	***0***	***0***	No	***3.8***	***2***	***3***	***0***							
		1620 S. 14th Street					1									1								
		1621 S. Tucker				1										1								
		1620 S. Tucker				1										1								
	Totals	**King Louis Square**				**2**	**1**									**3**	**0**							
MO1-48	**MO1-480**	***Les Chateau***	***2003***	***40***	***0***	***30***	***10***	***0***	***0***	***0***	***0***	***0***	No	***3.8***	***2***	***6***	***2***							
		1020 S. 14th Street																						
		UNIT 108				1											1							
		UNIT 114					1										1							
		UNIT 107				1										1								
		UNIT 109				1										1								
		UNIT 110				1										1								
		UNIT 210					1									1								
		UNIT 214				1										1								
		UNIT 310				1										1								
	Totals	**Les Chateau**				**6**	**2**									**6**	**2**							
M01-49	**MO1-490**	***King Louis Square II***	***2004***	***44***	***0***	***10***	***21***	***13***	***0***	***0***	***0***	***0***	No	***3.8***	***2***	***1***	***0***							
		1437 Park						1								1								
	Totals	**King Louis Square II**						**1**								**1**	**0**							
MO1-50	**MO1-500**	***Renaissance at Grand***	***2005***	***62***	***0***	***3***	***32***	***15***	***10***	***2***	***0***	***0***	No	***3.8***	***2***	***3***	***2***							
		3435 A Delmar						1								1								
		3435 B Delmar							1							1								
		3332 A Bell				1										1								
		3305 A Franklin				1											1							
		3414 B Bell					1										1							
	Totals	**Renaissance at Grand**				**2**	**1**	**1**	**1**							**3**	**2**					**223**	**16**	
MO1-51	**MO1-510**	***McMillan Manor II***	***2004/08***	***18***	***0***	***0***	***0***	***4***	***14***	***0***	***0***	***0***	No	***3.8***	***2***	***1***	***1***							
		4569 McMillan						1								1								
		4567 McMillan						1									1							
	Totals	**McMillan Manor II**						**2**								**1**	**1**					**34**	**1**	

Accessible Units Under ACC			DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments
HUD Project #	SLHA MO #	Development												M	H/V	M	H/V	M	H/V	M	H/V			
MO1-52	MO1-520	*King Louis Square III*	*2006*	*24*	*0*	*8*	*0*	*12*	*4*	*0*	*0*	*0*	No	*3.8*	*2*	*3*	*0*							
		1116 14th Street				1										1								
		1324 Lasalle				1										1								
		1101 13th St.							1							1								
	Totals	**King Louis Square III**				**2**			**1**							**3**	**0**							
MO1-54	MO1-540	*Sen. Living @ Ren. Pl.*	*2006*	*75*	*0*	*69*	*6*	*0*	*0*	*0*	*0*	*0*	No	*3.8*	*2*	*5*	*3*							
		3217 MLK																						
		UNIT 103				1											1							
		UNIT 104				1										1								
		UNIT 105				1										1								
		UNIT 106				1											1							
		UNIT 121				1										1								
		UNIT 126				1										1								
		UNIT 129				1										1								
		UNIT 305				1											1							
	Totals	**Sen. Living @ Ren. Pl.**				**8**										**5**	**3**					**73**	**8**	
MO1-55	MO1-550	*Gardens @ Ren.*	*2006*	*22*	*0*	*20*	*2*	*0*	*0*	*0*	*0*	*0*	No	*3.8*	*2*	*1*	*3*							
		3117 Thomas																						
		UNIT 102				1											1							
		UNIT 103				1											1							
		UNIT 206					1									1								
		UNIT 305				1											1							
	Totals	**Gardens @ Ren.**				**3**	**1**									**1**	**3**					**31**	**2**	
MO1-56	MO1-560	*Cahill House*	*2006*	*80*	*0*	*77*	*3*	*0*	*0*	*0*	*0*	*0*	No	*3.8*	*2*	*10*	*2*							
		1919 O'Fallon																						
		UNIT 110				1										1								
		UNIT 121				1										1								
		UNIT 130					1									1								
		UNIT 203				1											1							
		UNIT 210				1										1								
		UNIT 216				1										1								
		UNIT 230				1										1								
		UNIT 240					1									1								
		UNIT 303				1											1							
		UNIT 310				1										1								
		UNIT 316				1										1								
		UNIT 330				1										1								
	Totals	**Cahill House**				**10**	**2**									**10**	**2**					**52**	**2**	
MO1-57	MO1-570	*Ren Pl at Grand II*	*2006*	*36*	*0*	*0*	*27*	*7*	*2*	*0*	*0*	*0*	No	*3.8*	*2*	*3*	*0*							
		822 A Leonard						1								1								
		822 B Leonard							1							1								
		3222 B Bell Ave					1									1								
	Totals	**Ren Pl at Grand II**				**0**	**1**	**1**	**1**							**3**	**0**					**110**	**6**	
MO1-58	MO1-580	*Cambridge Heights*	*2007*	*46*	*0*	*9*	*21*	*9*	*5*	*2*	*0*	*0*	No	*3.8*	*2*	*6*	*2*							
		1435 8th St.				1										1								

Accessible Units Under ACC HUD Project #	SLHA MO #	Development	DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required M	% Units Required H/V	# Of Units Existing M	# Of Units Existing H/V	# Of Units under const M	# Of Units under const H/V	# Of Units Planned M	# Of Units Planned H/V	# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments
		816 Dickson St.						1									1							
		1312 8th St.						1									1							
		704 A Dickson St.				1										1								
		1411 B 7th St.					1									1								
		1401 A 7th St.				1										1								
		1314 A 7th St.				1										1								
		1309 B 7th St.					1									1								
	Totals	**Cambridge Heights**				**4**	**2**	**2**	**0**							**6**	**2**					**125**	**7**	
MO1-59	**MO1-590**	***Ren Pl at Grand III***	***2008***	***50***	***0***	***6***	***11***	***21***	***10***	***2***	***0***	***0***	No	***3.8***	***2***	***8***	***0***							
		1101 A N. Compton					1									1								
		3217 A School St.						1								1								
		1100 C N. Leonard					1									1								
		3203 A Renaissance					1									1								
		1201 A N. Leonard							1							1								
		1201 B N. Leonard						1								1								
		1216 A Josephine Baker					1									1								
		1216 C Josephine Baker				1										1								
	Totals	**Ren Pl at Grand III**				**1**	**4**	**2**	**1**							**8**	**0**					**153**	**11**	
MO1-60	**MO1-600**	***Cambridge Heights II***	***2009***	***44***	***0***	***2***	***15***	***16***	***7***	***4***	***0***	***0***	No	***3.8***	***2***	***3***	***2***							
		1311 8th St.						1									1							
		835 Carr St.								1							1							
		1207 A 8th St.					1									1								
		1109 A 8th St.					1									1								
		1109 B 8th St.				1										1								
	Totals	**Cambridge Heights II**				**1**	**2**	**1**	**0**	**1**						**3**	**2**					**102**	**9**	
MO1-62	**MO1-620**	***Sr. Living at Cambridge***	***2011***	***75***	***0***	***72***	***3***	***0***	***0***	***0***	***0***	***0***	No	***3.8***	***2***	***3***	***2***							
		728 Biddle																						
		UNIT 101				1											1							
		UNIT 107				1										1								
		UNIT 126					1									1								
		UNIT 201				1											1							
		UNIT 205				1										1								
	Totals	**Sr. Living at Cambridge**				**4**	**1**	**0**	**0**							**3**	**2**					**54**	**4**	
MO1-63	**MO1-630**	***North Sarah***	***2012***	***59***		***0***	***34***	***25***	***0***	***0***	***0***	***0***	No	***5***	***2***	***5***	***2***							
		4091 Finney Ave, Unit 106					1									1								
		4075 Finney Ave, Unit A						1								1								
		4075 Finney Ave, Unit B						1								1								
		4059 Finney Ave						1									1							
		4078 CD Banks Ave, Unit A						1								1								
		4078 CD Banks Ave, Unit B						1								1								
		4058 CD Banks Ave					1										1							
	Totals	**North Sarah**					**2**	**5**								**5**	**2**					**120**	**8**	
MO1-64	**MO1-640**	***Arlington Grove***	***2012***	***70***		***0***	***47***	***23***	***0***	***0***	***0***	***0***	No	***5***	***2***	***5***	***2***							
		1627 Burd Ave					1										1							
		1632 Clara Ave					1									1								
		5551 MLK Blvd., Unit 210					1									1								

Accessible Units Under ACC

HUD Project #	SLHA MO #	Development	DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments
														M	H/V	M	H/V	M	H/V	M	H/V			
		1617 Burd Ave, Unit 101					1									1								
		1522 Clara Ave, Unit A						1								1								
		1522 Clara Ave, Unit B						1								1								
		5568 Theodosia						1									1							
	Totals	Arlington Grove					4	3								5	2					122	8	
MO1-65	MO1-650	*North Sarah II*	*2014*	*46*		*5*	*32*	*25*	*0*	*0*	*0*	*0*	No	*2.3*	*0.92*	*5*	*3*							
		4145 CD Banks Ave, Unit A						1								1								
		4115 CD BANKS AVE						1									1							
		4132 FINNEY AVE					1										1							
		4110 FINNEY AVE					1										1							
		4105 CD Banks Ave, Unit 101					1									1								
		3903 CD Banks Ave, Unit 110				1										1								
		3903 CD Banks Ave, Unit 203					1									1								
		3902 CD Banks Ave, Unit 203					1									1								
	Totals	*North Sarah II*				1	5	2								5	3					112	8	
MO1-66	MO1-66	*North Sarah III*	*2017*	*35*	*0*	*13*	*43*	*21*	*0*	*0*	*0*	*0*	No	*1.75*	*0.7*	*5*	*3*							
		1034 Whittier Street				*1*										1								
		1050 Whittier Street				*1*										1								
		1022 Whittier Street					1									1								
		1028 Whittier Street				*1*										1								
		4158 CD Banks Ave.					1										1							
	Totals	North Sarah III				3	2	0								4	1					82	6	
MO1-67	MO1-67	*Preservation Square*	*2022*	*19*	*0*	*31*	*83*	*17*	*0*	*0*	*0*	*0*	No	*5*	*2*	*14*	*1*							
		1808 Cass Avenue					2									1								
		1800B Cass Avenue						3								1								
		1714 Cass Avenue					2									1								
		1725 Cochran Place					2									1								
		1723 Cochran Place					2									1								
		1819A Cochran Place					2									1								
		1452 Hogan Street					2									1								
		1822 Cass Avenue					2									1								
		1700 Cass Avenue					2									1								
		1702 Cass Avenue					2									1								
		1619 Cochran Place					2									1								
		1631 Cochran Place					2									1								
		1715A Cochran Place					2									1								
		1703 Cochran Place					2									1								
		1812 Cass Avenue					2										1							
	Totals	Preservation Square				0	28	3					No			14	1					121	9	
		GRAND TOTAL		2809	8	184	95	52	16	3	0	0		8.86%	3.45%	249	97	0	0	0	0	2376	204	

Accessible Units Under ACC

HUD Project #	SLHA MO #	Development	DOFA Year	Total # Units	0 Bd	1 Bd	2 Bd	3 Bd	4 Bd	5 Bd	6 Bd	7 Bd	Rehab > 75% of TDC (Y/N) IF Yes, Year done	% Units Required		# Of Units Existing		# Of Units under const		# Of Units Planned		# OF PARKING SPACES	# OF ADA PARKING SPACES	Comments
														M	H/V	M	H/V	M	H/V	M	H/V			

ST. LOUIS HOUSING AUTHORITY

At the corner of family and future

Executive Department

3520 Page Blvd. ■ St. Louis, MO 63106 ■ p 314.531-4770 ■ f 314.531.0184 ■ tdd 314.286.4223 ■ www.slha.org

MEMORANDUM

To: Board of Commissioners

From: Latasha Barnes, Acting Executive Director

Date: June 12, 2024

Subject: Resolution No. 30XX
Approving and Authorizing the Submission of the Agency Plan Annual Submission for Fiscal Year 2024

Board approval is requested to authorize the St. Louis Housing Authority to submit the Agency Plan Annual Submission for fiscal year 2024.

The St. Louis Housing Authority has prepared the Agency Plan Annual Plan Submission in accordance with the regulations and requirements of 24 CFR 903.

Resident planning meetings were conducted to encourage meaningful participation in the planning and development process of the annual submission.

The proposed Agency Plan Annual Submission includes the following exhibits for your review:

1. Comments and Response Summary from Public Hearing
   - Comments and Responses to Agency Plan Section C.1
2. Flyers for the Town Hall Meeting and Public Hearing
3. Certification of Compliance
4. Civil Rights Certification
5. Certification by State or Local Official of PHA Plans Consistency with the Consolidated Plan or State Consolidated Plan

Resolution No. 30XX
Presented to the Board June 27, 2024

Approving and Authorizing the Submission of the Agency Plan Annual Submission for Fiscal Year 2024

WHEREAS, the St. Louis Housing Authority (SLHA) desires to submit the Agency Plan Annual Submission for fiscal year 2024; and

WHEREAS, the Agency Plan Annual Submission has been prepared in accordance with 24 CFR Part 903 regulations and requirements for submission to HUD; and

WHEREAS, SLHA has worked in collaboration with the St. Louis Tenant Affairs Board and conducted planning meetings to obtain recommendations in the development of the proposed Annual Submission; and

WHEREAS, SLHA has published notices and made the proposed Agency Plan Annual Submission available for inspection and public comment for a period of 45 days prior to the Public Hearing; and

WHEREAS, SLHA has obtained certification from local government officials that the proposed Agency Plan Annual Submission is consistent with the jurisdiction consolidated plan; and

WHEREAS, SLHA conducted a virtual Public Hearing on June 14, 2024 to obtain public comments regarding the proposed Annual Submission; and

WHEREAS, SLHA has considered all comments and recommendations received, and has incorporated all relevant changes in the proposed Agency Plan Annual Submission.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE ST. LOUIS HOUSING AUTHORITY THAT:

1. The Executive Director of the St. Louis Housing Authority is authorized and directed to submit the Agency Plan Annual Submission for fiscal year 2024 to the U.S. Department of Housing and Urban Development.

Sal F. Martinez, Chairman
Board of Commissioners
St. Louis Housing Authority

Latasha Barnes, Acting Secretary
Board of Commissioners
St. Louis Housing Authority

Approved by the Board of Commissioners on June 27, 2024

At the corner of family and future

Development & Modernization Department

3520 Page Blvd. ■ St. Louis, MO 63106 ■ p 314.531-4770 ■ f 314.531.0184 ■ tdd 314.286.4223 ■ www.slha.org

MEMORANDUM

To: Board of Commissioners

Through: Latasha Barnes, Acting Executive Director

From: Jason W. Hensley, Director of Real Estate Development

Date: June 12, 2024

Subject: Resolution No. 30XX
Approving and Authorizing the St. Louis Housing Authority Capital Fund Five-Year Plan and the FFY 2024 Capital Fund Annual Statement

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In 2013, HUD published the Capital Fund Final rule, which decoupled the Capital Fund Submissions from the Agency Plan. The rule requires housing authorities to develop a separate Capital Fund submission. Housing authorities are required to hold a public hearing, consult with the resident advisory board (RAB) and submit any comments received from these hearings and the consultations for the Capital Fund submission. HUD guidance suggests that this process be held concurrent with the Agency Plan process.

The St. Louis Housing Authority (SLHA) prepared a revised Capital Fund Five-Year Plan (Plan) in conjunction with the 2024-2028 Agency Five-Year Plan and Annual Plan. SLHA provided a 45-day comment period and conducted a public hearing on June 17, 2024. The Capital Fund Five-Year Plan was available to residents and the St. Louis Tenant Affairs Board (the City-Wide RAB) prior to the hearing. The comments to the Capital Fund Five-Year Plan and the responses are attached.

In addition, HUD revised the process for accepting annual Capital Fund grants. The ACC amendments are now deemed executed when the first funds are drawn from the grant. Board approval of individual ACC amendments is no longer required. Additionally, HUD no longer provides Replacement Housing Factor Capital Fund grants. SLHA was notified on XXXXXXXXXXXXXXXXX that its FFY 2024 Capital Fund allocation is $X,XXX,XXX.XX. SLHA completed the FFY 2024 Capital Fund Annual Statement in accordance with the latest approved Capital Fund Five-Year Plan.

A Physical Needs Assessment (PNA) has been finalized and accepted by SLHA and the data has been used to realign the capital fund for the five-year 2024-2028 planning period.

Board approval of the SLHA Capital Fund Five-Year Plan, FFY 2024 Capital Fund Annual Statement and the definition of a significant amendment or modification to the plan are requested. All supporting documents are attached.

Resolution No. 30XX
Presented to the Board of Commissioners June 27, 2024

Authorizing and Approving the St. Louis Housing Authority Capital Fund Five-Year Plan and the FFY 2024 Capital Fund Annual Statement

WHEREAS, the St. Louis Housing Authority (SLHA) has prepared the Capital Fund Five-Year Plan and the FFY 2024 Capital Fund Annual Statement in accordance with 24 CFR § 903.7(g) and the guidance provided by HUD; and

WHEREAS, SLHA has worked in collaboration with the St. Louis Tenant Affairs Board and conducted planning meetings to obtain comments on the proposed Capital Fund Five-Year Plan and FFY 2024 Capital Fund Annual Statement; and

WHEREAS, SLHA has published notices and made the proposed Capital Fund Five-Year Plan and FFY 2024 Capital Fund Annual Statement available for inspection and public comment for a period of 45 days prior to the Public Hearing; and

WHEREAS, SLHA has developed a definition of a significant amendment or modification to the plan regarding the proposed Capital Fund Five-Year Plan; and

WHEREAS, SLHA conducted a Public Hearing on June 17, 2024 to obtain public comments regarding the proposed Capital Fund Five-Year Plan; and

WHEREAS, SLHA has considered all comments and recommendations received and has incorporated all relevant changes in the proposed Capital Fund Five-Year Plan.

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COMMISSIONERS OF THE ST. LOUIS HOUSING AUTHORITY THAT:

1. The Acting Executive Director of the St. Louis Housing Authority is authorized and directed to take all actions necessary to obtain HUD approval and implement the Capital Fund Five-Year Plan and the FFY 2024 Capital Fund.

____
Sal Martinez, Chairman
Board of Commissioners
St. Louis Housing Authority

____
Latasha Barnes, Acting Secretary
Board of Commissioners
St. Louis Housing Authority

Approved by the Board of Commissioners on June 27, 2024