

August 1, 2025

POSTING for Public Comment

The Housing Authority is seeking comments on its proposed 2026 Annual Plan. The proposed Plan are available for review by the public on HAKC's website at www.hakc.org. The proposed Plan are also available for review by the public during normal business hours at its offices and any of the public housing apartment complexes. Refer to HAKC's website at www.hakc.org for the location of offices and apartment complexes.

Written comments on the 2026 Annual Plan may be submitted to the Housing Authority through Noon on Monday September 17, 2025. Comments may be submitted by email to hakc@hakc.org; or by mail to The Housing Authority of Kansas City, Missouri, Attn: Executive Director 3822 Summit. Kansas City, Missouri 64111-4652

A public hearing on the proposed 2026 Annual Plan will be held on Monday, September 17, 2025 at 5:30 PM in the Boardroom of HAKC's Administrative offices located at 3822 Summit, Kansas City, MO 64111.

Nona C. Eath
Executive Director



Annual PHA Plan <i>(Standard PHAs and Troubled PHAs)</i>	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires: 9/30/2027
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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. They also inform 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-, very low-, 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. Note: PHAs with zero public housing units must continue to comply with the PHA Plan requirements until they closeout their Section 9 programs (ACC termination).

Definitions.

- (1) **High-Performer PHA** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers (HCVs) 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, SEMAP for PHAs that only administer tenant-based assistance and/or project-based assistance, 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 HCVs combined and is not PHAS or SEMAP troubled.

A.	PHA Information.
A.1	<p> PHA Name: _____ PHA Code: _____ PHA Type: <input type="checkbox"/> Standard PHA <input type="checkbox"/> Troubled PHA PHA Plan for Fiscal Year Beginning: (MM/YYYY): _____ PHA Inventory (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) Number of Public Housing (PH) Units _____ Number of Housing Choice Vouchers (HCVs) _____ Total Combined Units/Vouchers _____ PHA Plan Submission Type: <input type="checkbox"/> Annual Submission <input type="checkbox"/> Revised Annual Submission </p> <p> Public Availability of Information. In addition to the items listed in this form, 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 and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans. </p>

(c) The PHA must submit its Deconcentration Policy for Field Office review.

B.2 New Activities.

(a) Does the PHA intend to undertake any new activities related to the following in the PHA's applicable Fiscal Year?

Y N

- | | | |
|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | Choice Neighborhoods Grants. |
| <input type="checkbox"/> | <input type="checkbox"/> | Modernization or Development. |
| <input type="checkbox"/> | <input type="checkbox"/> | Demolition and/or Disposition. |
| <input type="checkbox"/> | <input type="checkbox"/> | Designated Housing for Elderly and/or Disabled Families. |
| <input type="checkbox"/> | <input type="checkbox"/> | Conversion of Public Housing to Tenant-Based Assistance. |
| <input type="checkbox"/> | <input type="checkbox"/> | Conversion of Public Housing to Project-Based Rental Assistance or Project-Based Vouchers under RAD. |
| <input type="checkbox"/> | <input type="checkbox"/> | Homeownership Program under Section 32, 9 or 8(Y) |
| <input type="checkbox"/> | <input type="checkbox"/> | Occupancy by Over-Income Families. |
| <input type="checkbox"/> | <input type="checkbox"/> | Occupancy by Police Officers. |
| <input type="checkbox"/> | <input type="checkbox"/> | Non-Smoking Policies. |
| <input type="checkbox"/> | <input type="checkbox"/> | Project-Based Vouchers. |
| <input type="checkbox"/> | <input type="checkbox"/> | Units with Approved Vacancies for Modernization. |
| <input type="checkbox"/> | <input type="checkbox"/> | 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 applicable 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.

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.
B.5	Most Recent Fiscal Year Audit. (a) Were there any findings in the most recent FY Audit? Y N <input type="checkbox"/> <input type="checkbox"/> (b) If yes, please describe:
C.	Other Document and/or Certification Requirements.
C.1	Resident Advisory Board (RAB) Comments. (a) Did the RAB(s) have comments to the PHA Plan? Y N <input type="checkbox"/> <input type="checkbox"/> (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	<p>Certification by State or Local Officials.</p> <p>Form HUD 50077-SL, <i>Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.3	<p>Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.</p> <p>Form HUD-50077-ST-HCV-HP, <i>PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed</i>, must be submitted by the PHA as an electronic attachment to the PHA Plan.</p>
C.4	<p>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.</p> <p>(a) Did the public challenge any elements of the Plan?</p> <p>Y N</p> <p><input type="checkbox"/> <input type="checkbox"/></p> <p>(b) If yes, include Challenged Elements.</p>

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

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(b) If yes, please describe:

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 Number of HCVs, PHA Plan Submission Type,** and the **Public Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. Note: The number of HCV's should include all special purpose vouchers (e.g. Mainstream Vouchers, etc.) (24 CFR 903.23(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 identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

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 maintaining 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 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)). Note: All coordination and activities must be consistent with federal civil rights obligations. 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 survivors of domestic violence, dating violence, sexual assault, or stalking; (2) Any activities, services, or programs provided or offered by a PHA that helps survivors 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 survivor 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(s)(2)(i)).

☐ **Significant Amendment/Modification.** PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan (24 CFR 903.7(s)(2)(ii)). For modifications resulting from the Rental Assistance Demonstration (RAD) program, refer to the 'Sample PHA Plan Amendment' found in Notice PIH 2019-23(HA), 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."

☐ **Choice Neighborhoods Grants.** (1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for Choice Neighborhoods Grants; and (2) A timetable for the submission of applications or proposals. The application and approval process for Choice Neighborhoods is a separate process. See guidance on HUD's website at: <https://www.hud.gov/cn> (Notice PIH 2011-47).

☐ **Modernization or Development (Conventional & Mixed-Finance).** (1) A description of any Public Housing (including name, project number (if known) and unit count) for which the PHA will apply for modernization or development; and (2) A timetable for the submission of applications or proposals. The application and approval process for modernization or development is a separate process. (See 24 CFR part 905 and 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, (1) 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: https://www.hud.gov/program_offices/public_indian_housing/centers/sac/demo_dispo/ and 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 (1) 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 under Section 33; 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 the Special Applications Center (SAC) (<https://www.hud.gov/sac>) and 24 CFR 903.7(j).

☐ **Conversion of Public Housing under the Rental Assistance Demonstration (RAD) program (including Faircloth to RAD).** 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. Note that all PHAs shall be required to provide the information listed in Attachment 1D of Notice PIH 2019-23(HA) as a significant amendment or its successor notice. See additional guidance on HUD's website at: <https://www.hud.gov/RAD/library/notices>.

☐ **Homeownership Programs.** A description of any Section 5h, Section 32, Section 8y, or 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)).

☐ **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 day 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-2021-35 (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 2021-35. (24 CFR 960.505) (24 CFR 903.7(b))
NOTE: All activities must be consistent with civil rights laws – including ensuring that it does not have a disparate impact on protected class groups based on race, color, religion, national origin, sex (including sexual orientation), familial status, and disability.

☐ **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 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 24 CFR 983.55(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 (including if PBV units are planned on any former or current public housing units or sites), and describe how project-basing would be consistent with the PHA Plan (24 CFR 903.7(b)(3), 24 CFR 903.7(r)).

☐ **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 Lead Based Paint, Housing Related Hazards, At Risk/Receivership/Substandard/Troubled Program, and/or Emergency Safety and Security Grants).

For all activities that the PHA plans to undertake in the applicable 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(s)(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 XX/XX/XXXX."

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 24 CFR 5.150 et. seq., 24 CFR 903.7(o)(1), and 903.15.

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 (24 CFR 903.23(b)).

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).

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 5.64 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. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0226. 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 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.

Attachment A – Statement of Housing Needs and Strategy for Addressing Housing Needs

The Housing Authority of Kansas City, Missouri (HAKC) is committed to serving those families in need of high-quality, affordable housing by creating and operating housing that is appropriate for the needs of the families that we serve. Based on available demographic and operational data gained from market studies and housing inventory assessments, HAKC recognizes a continued and growing need for affordable housing that serves families at all income levels. Furthermore, HAKC recognizes a need for housing with supportive services and housing targeted to elderly/disabled families and those with housing instability needs.

Affordable Housing Inventory Needs

HAKC serves families across the income spectrum, with incomes that range from extremely low income (30% of AMI or below) to low income (80% of AMI). Additionally, our program participants are diverse in terms of age, racial identification, and family size, requiring that HAKC operate an equally diverse housing portfolio that includes housing that meets the needs of our current and potential future resident population.

According to a recent study by the Mid-America Regional Council (MARC) there is a current shortage of nearly 64,000 affordable housing units in the Kansas City metropolitan area, with nearly half of the renters in the region living in cost-burdened environments, paying more than 30% of their income towards housing. Of the 64,000 units needed, more than 44,000 of those units should be targeted towards families that are extremely low-income. This points to the increased need for strategic investments in subsidized affordable housing through resources that help to provide sustainable long-term affordable housing such as Low-Income Housing Tax Credits (LIHTC), or Project Based Vouchers (PBV).

Beyond the stated demand for affordable housing, there are considerable structural obsolescence and operational deficiencies within HAKC's existing public housing portfolio. Many of the properties utilize outdated design standards, obsolete mechanical and electrical systems, and have substandard site grading and water drainage. These issues contribute to above-average operational costs and limit the ability of HAKC to invest in the kind of large-scale modernization activities that are necessary to ensure long term viability.

Strategies for Addressing Housing Needs

HAKC, based on an assessment of the resources available for the development of affordable housing, the capital needs of the current housing inventory, and the overall demand for affordable housing in the region, has determined that the following approaches will be the most likely to produce impactful results and decrease overall affordable housing need.

HAKC intends to secure a credit rating from one or several global ratings agencies (S&P, Moody's, etc.) which will allow the Authority to issue debt (bonds) to investors that will be used to fund affordable housing development. HAKC also intends to secure a credit facility/line of credit from a major banking institution to self-finance projects, actively lowering our construction and development costs by decreasing overall interest expense for development and construction lending.

HAKC further intends to continue to use Low-Income Housing Tax Credits (LIHTC) and similar resources to fund the development of affordable housing, both independently and in partnership with other groups, non-profits, and developers. HAKC will explore other non-traditional funding sources beyond those listed above in order to maintain a diverse and flexible portfolio of funding resources that can be used to acquire, create, and preserve affordable housing.

Additionally, HAKC will leverage Project Based Voucher to help solidify financing for a multitude of internal and external projects. To help support a revolving and sustainable funding environment HAKC intends to change the way that vouchers are awarded going forward. HAKC will now require that any developer seeking PBV from HAKC, be required to partner with one of HAKC's non-profit entities and provide a portion of cash flow and developer fee to HAKC, to ensure that we have resources for development going forward.

HAKC intends to engage in redevelopment and preservation activities that cover the entire HAKC housing portfolio. This may include disposition, demolition, redevelopment and other modernization activities that transform the existing housing into modern affordable housing. Developments may remain as 100% affordable housing or may be redeveloped to encourage a more mixed-income resident population. Planned activities

may include the redevelopment, disposition, and/or demolition of all or some of the following sites:

- Brush Creek Towers (135 Units)
- West Bluff (100 Units)
- Pemberton Heights (120 Units)
- Dunbar Gardens (65 Units)
- Riverview Gardens (232 Units)
- Theron B. Watkins Homes (210 Units)
- Guinotte Manor (219 Units)
- Scattered Sites (430 Units)

Operations and Management

This element has been updated to reflect current information relating to the HAKC Public Housing and HCV waiting lists. As of June 30, 2025, there were a total of 14,347 applicants on the Public Housing waiting list. Approximately 93.95% of those applicants (13,650) qualify as extremely low-income families.

As of June 30, 2025, the Housing Authority of Kansas City (HAKC) had a total of 27,523 applicants on the Housing Choice Voucher (HCV) waitlist. The vast majority of applicants are single-member households, reflecting the high need for affordable housing options for individuals. The composition of families on the HCV waitlist by household size is as follows:

Low Income Public Housing Waiting List						
Family Size	1	2	3	4	5	Total
Total Number of Applicants	13,423	569	265	77	13	14,347
Percent of Total	93.95%	3.96%	1.84%	0.53%	0.09%	100%

HCV Waiting List						
Family Size	1	2	3	4	5	Total
Total Number of Applicants	24,061	2,648	681	122	11	27,523
Percent of Toal	87.42%	9.62%	2.47%	0.44%	0.04%	100%

Attachment B – Deconcentration Policy and Analysis

The Housing Authority of Kansas City, Missouri (HAKC) is committed to promoting income diversity and reducing the geographic concentration of poverty in its public housing communities. This aligns with HUD’s requirements under 24 CFR Part 903 and supports HAKC’s mission to foster inclusive and economically vibrant neighborhoods.

Methodology

1. HAKC annually determines the average income of all families in covered developments.
2. HAKC calculates the average income for each covered development, without adjustment for unit size.
3. HAKC compares each development’s average income to the Established Income Range (EIR), defined as 85% to 115% of the overall average.
4. HAKC identifies developments above or below the EIR and evaluates them for consistency with strategic goals.
5. If needed, HAKC applies strategies to address deconcentration and income-mixing, such as:
 - a. Targeting working families for lower-income sites
 - b. Encouraging higher-income families through marketing, amenities, and community investment
 - c. Supporting current households in raising income through employment services
 - d. Using transfer offers and PBV allocations strategically

Strategies for Below-Range Developments (<85%)

- Increase income via resident services, job training, and financial literacy
- Leverage RAD and capital funds for modernization to attract diverse households
- Collaborate with economic mobility partners (e.g., FSS, ROSS, Choice Neighborhoods)

Strategies for Above-Range Developments (>115%)

- Maintain balanced occupancy through admissions planning and transfer opportunities
- Monitor to avoid unintentional exclusion of lower-income applicants
- Ensure fair access via affirmative marketing and tenant protections

Attachment C – Financial Resources

The table below summarizes the anticipated financial resources available to the Housing Authority of Kansas City, Missouri (HAKC) for Fiscal Year 2026, along with the intended uses of those funds.

Housing Authority of Kansas City Missouri		
Financial Resources		
Sources	Estimated Funding FY 2026	Planned Use
Public Housing Program Resources		
Operating Fund	6,950,000	Public Housing Operations
FY 2026 Capital Fund (65%)	2,596,424	Public Housing Capital Improvements
FY 2026 Capital Fund (35%)	1,398,074	Public Housing Operations
Subtotal - 2026 Grants	10,944,498	
Rental Income	5,390,000	
Other Income		
Non-dwelling	119,828	Public Housing Operations
Other Tenant Charges	224,000	Public Housing Operations
Choice Endowment Fund	386,377	Case management services to promote self sufficiency
Everygy Grant	444,842	Electric Utility assistance for clients from the wait list
COMBAT Grant	49,485	Services to prevent substance use disorders or violent crime
Subtotal - Other Income	1,224,532	
Public Housing Resources - Prior Year Grants		
2025 Capital Grant	3,245,531.00	Public Housing Capital Improvements
2024 Capital Grant	540,000	Public Housing Capital Improvements
2023 Capital Grant (TB Watkins)	2,316,248	TB Warkins/Wayne Minor Capital Improvements
ROSS Grant	142,600	Hire and maintain Service Coordinators
Subtotal - Prior Year Grants	6,244,379	
Total Resources - Public Housing	23,803,409	
Section 8 Program Resources		
Housing Assistance Payment - HCVP	69,750,000	Payments to Landlords
Administrative Fee - HCVP	4,518,000	Program Administrative fee
Housing Assistance Payment - Main Stream	1,385,500	Payments to Landlords
Administrative Fee - Main Stream	24,800	Program Administrative fee
Family Self Sufficiency Program Grant	292,572	Self Sufficiency activities - Service Coordinators
Family Self Sufficiency Program Forfeitures	420,000	Self Sufficiency activities
Total Resources for Section 8 Program	76,390,872	
Total Resources	100,194,281	

Attachment D – Operations and Management

This attachment outlines the policies and practices used by the Housing Authority of Kansas City, Missouri (HAKC) in the operations and management of its Public Housing and Housing Choice Voucher (HCV) programs. These practices ensure compliance with applicable HUD regulations and support equitable, transparent service delivery.

1. Policy and Administrative Updates

HAKC proposes to implement revisions to its Admissions and Continued Occupancy Policy (ACOP) and Housing Choice Voucher Administrative Plan in response to HOTMA (Housing Opportunity Through Modernization Act) as outlined in HUD PIH Notice 2023-27. These updates reflect changes to the eligibility, verification, leasing, reexaminations, and grievance procedures, among others.

2. RAD and Development Operations

HAKC continues to manage its Rental Assistance Demonstration (RAD) portfolio in compliance with PIH Notice 2019-23 and other RAD-specific regulatory requirements. Management and maintenance functions for RAD-converted units are governed through the specific programs utilized to finance development including LIHTC, PBV, and other site-specific management plans. HAKC provides critical oversight of management partners and ensure compliance and proper enforcement of leases and program requirements through the use of desk audits, site visits, and operations reviews.

3. Program Oversight and Management Structure

HAKC operations are managed through a centralized administrative structure with department-level accountability. Key departments include:

- Public Housing Management and Maintenance
- Housing Choice Voucher (HCV) Program
- Facilities and Capital Projects
- Resident Services (including ROSS, FSS, and Choice Neighborhoods)
- Public Safety
- Procurement and Finance
- Information Technology
- Quality Control and Policy Review

4. Administrative and Tenant-Facing Policies

HAKC's ACOP and Administrative Plan includes guidance in the following areas:

- VAWA Implementation and Emergency Transfer Plan
- Community Service and Self-Sufficiency Requirements (CSSR)
- Pet and Assistance Animal Policies
- Reasonable Accommodation Procedures
- Debt Repayment Agreements and Termination Processes
- Fair Housing and Language Access Plan (LEP)

These documents and any revision to such documents has been made available for public review with a September 1, 2025 effective date. Copies are available upon request and posted on HAKC's website.

Attachment E – Safety and Crime Prevention

The Housing Authority of Kansas City, Missouri (HAKC) maintains a dedicated Public Safety Department (PSD) to ensure the safety and well-being of public housing residents. The department enforces policies, collaborates with police, and implements proactive crime prevention programs. This attachment outlines HAKC's safety strategy, domestic violence response, and initiatives for community protection.

1. Public Safety Operations and Crime Prevention

HAKC's Public Safety Officers actively patrol all properties, document violations, investigate complaints, and address trash and blight. Monthly tenant meetings provide a forum to discuss safety concerns and crime trends. HAKC has a partnership with the Kansas City Missouri Police Department (KCPD), which includes a designated liaison officer who supports crime tracking and follow-up investigations across HAKC sites. Collaborative enforcement ensures accountability of tenants and guests.

In the year 2023, there were 946 documented policy violations. The violations include reported crime activity. In 2024 there were 791 reported violations. As of August 1, 2025, there have been 453 documented violations. The current pace is trending below 2023 and 2024. Property Managers, as well as the Director and Assistant Director of Operations, are kept informed of all major incidents. This integrated response strengthens policy enforcement, communication, and promotes a safer community environment.



2. Police Officer Occupancy Program

As part of a new crime prevention initiative, HAKC will develop a partnership with the City of Kansas City, Missouri and the Kansas City Missouri Police Department to recruit newly hired officers and educate them on the housing opportunities available through the Housing Authority. Officers will be provided information about unit availability and the terms of their tenancy. This effort aims to deter criminal behavior through increased law enforcement visibility and to reduce fear among residents.

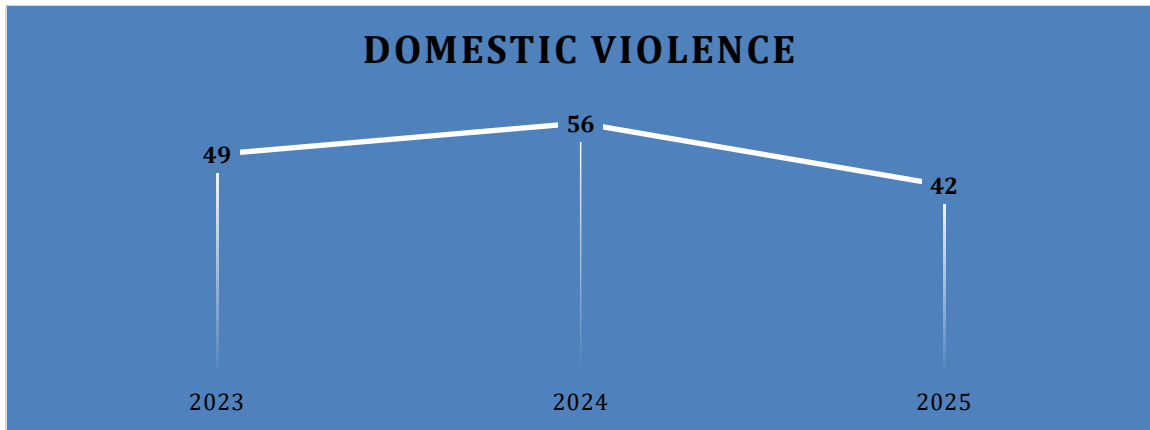
This program will be offered to full-time officers, excluding retirees or recently separated personnel. HAKC will meet with the Chief of Police and other law enforcement entities such as Missouri State Troopers to gain support and coordination.

3. Domestic Violence and Victim Support

HAKC partners with organizations such as Rose Brooks Center, Metropolitan Organization to Combat Sexual Assault, Samuel Rodgers Health Center, and Swope Mental Health to provide services for victims of domestic violence, dating violence, sexual assault, and stalking. These agencies offer emergency shelter, counseling, training, and medical services.

Public Safety Officers conduct follow-up investigations anytime a domestic violence incident is reported to the police on HAKC properties. Officers review all submitted reports to determine the role of each person involved. Non HAKC residents are banned from the property when there is sufficient evidence to prove that person committed a crime. Any resident suspected of being the perpetrator will be held accountable for a violation of their lease and could be terminated from their lease depending upon the severity of the act committed. Officers will conduct an assessment to determine if an immediate transfer request should be made.

In the year 2023, there were 49 reported domestic violence incidents on HAKC properties. In 2024, there were 56 domestic violence incidents reported on HAKC properties. As of August 1, 2025, there has been 42 reported incidents. If the trend remains the same, domestic violence incidents will be higher in 2025 than the last two years (70+).



The Public Safety Department works closely with Resident Services when victims are identified, ensuring that supportive resources are coordinated efficiently. Officers are undergoing training to better assist victims, including creating a power-point presentation to educate residents concerning the different forms of domestic violence and how to access help. The training will include action steps for HAKC staff, guidance for residents, and referral resources.

Attachment F

FY 2025 Proposed Statement of Substantial Deviation/Significant Amendment

HAKC defines a “Substantial Deviation” and/or “Significant Amendment or Modification” to the Agency Plan as any the following:

1. Material changes to rent, admissions policies, or to the organization of the waiting list
2. Any addition of non-emergency work items (i.e. items not included in the current Annual Statement or Five-Year Action Plan) over \$1,000,000
3. Any change with regard to demolition or disposition, designation of elderly or disabled housing, homeownership programs, Capital Fund financing, development, or mixed-finance proposal.

An exception to this definition will be made for any of the above that are adopted to reflect changes mandated by Congress or HUD regulatory requirements; such changes will not be considered significant amendments or deviations by HAKC.

New Activities – FY 2026 HAKC Annual Plan

The Housing Authority of Kansas City, Missouri (HAKC) is committed to enhancing its portfolio through innovative development strategies and supportive programming. The following outlines the new activities proposed or underway for the FY 2026 Annual Plan. These efforts align with HAKC's long-term goals of expanding affordable housing, supporting resident self-sufficiency, and modernizing aging housing stock.

1. Mixed-Finance and RAD Development

HAKC plans to continue its efforts to convert eligible public housing units to other non-operating subsidy based revenue models, including Housing Choice Voucher, Project Based Voucher, and other rental structures. HAKC intends to continue to utilize the Rental Assistance Demonstration (RAD) and/or Section 18 Demolition/Disposition programs. These activities are aligned with HAKC's long-term repositioning strategy.

HAKC anticipates the creation and implementation of a comprehensive development plan that incorporates a multi-faceted development approach that utilizes a variety of financing mechanisms to develop and preserve affordable housing. Sources may include bond issuance, low-income housing tax credits, and bank financing as well as other, yet to be undetermined financing resources. Project types will include new construction, adaptive reuse, and acquisitions.

2. Choice Neighborhoods Planning and Implementation

Following the successful completion of a previous Choice Neighborhoods Implementation (CNI) grant, HAKC will continue to assess the viability of utilizing CNI as a development tool for future redevelopment projects.

3. Section 18 Disposition Activities

HAKC continues to explore and implement Section 18 Disposition strategies for aging and obsolete public housing units that are no longer cost-effective to maintain. In FY 2026, HAKC will conduct a portfolio-wide capital needs assessment (CNA) and request HUD approval for the disposition and/or demolition of identified units, in conjunction with redevelopment planning under RAD and mixed-finance proposals. Additionally, HAKC intends to transition up to 100% of its existing scattered site public housing units via a disposition activity due to the combination of obsolescence and the unsustainability

of the operation of the units. HAKC may also utilize Section 18 dispositions as a means to transition existing housing sites and properties to HAKC non-profit entities as a function of the redevelopment of the site. Properties potentially impacted under Section 3 of this Attachment include:

- Brush Creek Towers (135 Units)
- West Bluff (100 Units)
- Pemberton Heights (120 Units)
- Dunbar Gardens (65 Units)
- Riverview Gardens (232 Units)
- Theron B. Watkins Homes (210 Units)
- Guinotte Manor (219 Units)
- Scattered Sites (430 Units)

4. Public Safety and Community Protection

As part of a new crime prevention initiative, HAKC will develop a partnership with the City of Kansas City, Missouri and the Kansas City Missouri Police Department to recruit newly hired officers and educate them on the housing opportunities available through the Housing Authority. Officers will be provided information about unit availability and the terms of their tenancy. This effort aims to deter criminal behavior through increased law enforcement visibility and to reduce fear among residents.

5. Housing Choice Voucher Expansion

In FY 2026, HAKC plans to expand its Housing Choice Voucher (HCV) utilization and issue new project-based voucher (PBV) awards to support special populations, including homeless individuals, families in rapid rehousing programs, and reentry participants. HAKC will also explore opportunities through the HUD Stability Voucher program and other new initiatives as funding becomes available.

6. Capital Fund and Modernization Activities

The Housing Authority of Kansas City, Missouri has developed a comprehensive Five-Year Action Plan to address critical physical needs, operational support, and modernization across all developments. Details provided in the most recent 2025-2029 5YAP submitted into EPIC and approved by HUD on July 7th, 2025.

Year 1 (2025) focuses on foundational improvements such as HVAC upgrades, stair repairs, unit flooring replacements, and modernization at key sites like Theron B. Watkins and Dunbar Gardens. Authority-wide, a Physical Needs Assessment will guide long-term planning.

Year 2 (2026) prioritizes infrastructure upgrades, including electrical panel replacements at Riverview and Brush Creek Towers, further HVAC modernization, plumbing repairs at Pemberton Heights, and scattered site foundation and retaining wall repairs. Authority-wide, service vehicles will be acquired to enhance project oversight.

Year 3 (2027) launches major exterior projects, including siding and wood rot repairs at Guinotte Manor, enhanced site security, and elevator engineering assessments at Brush Creek Towers. Flooring and common-area upgrades continue across all developments.

Year 4 (2028) builds on prior work with large-scale modernization at Theron B. Watkins, infrastructure repairs at Riverview, and unit upgrades at Pemberton Heights and scattered sites.

Year 5 (2029) completes modernization cycles with final HVAC, exterior, and structural improvements, particularly at Theron B. Watkins, Guinotte Manor, and Pemberton Heights, ensuring sustainable and improved living conditions.

Across all years, **common initiatives** include acquisition and modernization of IT hardware and infrastructure, operations support, flooring replacements, staff training, resident engagement, and routine audits. Investments focus on extending the useful life of housing assets, improving safety and accessibility, and enhancing resident quality of life.

HUD Approved Vacancies: The Housing Authority of Kansas City will identify units that meet the need under 24 CFR 990.145 for HUD Approved Vacancy and utilize either the operating fund or capital fund to perform necessary repairs and upgrades to maintain quality safe housing for tenants. This practice will apply to units scheduled for modernization as part of the CFP plan and vacated units where modernization needs are identified that need to be addressed to provide safe occupancy for the new tenant.

Other Capital Grant Programs: The Housing Authority will continue to assess capital needs and budgetary restraints to identify other grant programs to address aging infrastructure. This includes but is not limited to annual Safety and Security grant funding and applicable waivers to allow additional funds to be allocated to 1406 Operations funding for anticrime and antidrug activities.

Attachment H – Strategic Goals and Objectives (2025–2029)

The Housing Authority of Kansas City, Missouri (HAKC) sets forth the following strategic goals and objectives for the Five-Year Planning Period 2025–2029, aligning with HUD priorities and HAKC’s mission to serve low-income, very low-income, and extremely low-income families.

Goal 1 – Expand Affordable Housing Supply

HAKC will pursue opportunities to increase the availability of affordable housing units through redevelopment, new construction, mixed-finance projects, acquisition of property, and continued participation in RAD and Section 18 programs. We will actively seek out new funding sources and partnerships to support development efforts.

Goal 2 – Partnership Building

HAKC will continue to build the agency’s community partner list of over 50 community partners. For 2025 we have established new partnerships with the Metropolitan Community College of Kansas City and the Kansas City Chamber of Commerce. HAKC has also developed new partnerships with ARES CDL Institute and New Reflections Institute. These are Kansas City area career development institutions with the goal of engaging HAKC individuals and families to explore new career paths.

HAKC will continue to build Section 3 client list and provide job readiness in partnership with workforce development partners, Women’s Employment Network, Great Jobs KC, Full Employment Council, and Urban League, to prepare residents for potential Section 3 opportunities. These workforce agencies have collaborated with HAKC to do job readiness workshops and job fairs. HAKC has partnered with ARES Institute to put a number of our FSS participants through CDL training. New Reflections and Great Jobs KC will partner with ARES to do a Women’s Empowerment Summit at HAKC this year with the goal to make this an annual event.

HAKC has worked with community partners such as Google and PCs for people to get families connectivity for distance learning and computer education. We will be opening three new computer labs in the summer of 2025 in three of our family developments. HAKC has partnered with the KC Public Library and Book Rich Environments to create literacy communities and promote parent advocacy to

ensure children have an opportunity for school success. HAKC received community donations to provide school supplies and back packs to over 300 children at our back-to-school event this past summer. It is an annual event. For 2025 we are adding another element to the event. We are going to make the event a back-to-school cultural heritage fest to celebrate the diverse cultures that we have at HAKC.

Goal 3 – Financial Sustainability and Efficiency

HAKC will continue adapting to shifting funding environments by improving budgeting practices, enhancing revenue collection, and maximizing the effective use of federal dollars. Efforts will include streamlining processes, improving internal financial controls, and identifying cost-saving strategies to ensure operational resilience.

Goal 4 – Staff Development and Succession Planning

HAKC will invest in staff training, professional development, and cross-functional leadership opportunities. A formal succession plan will be implemented to prepare future leaders and ensure institutional knowledge retention.

Goal 5 – Enhance Safety for Residents and Employees

Through its Public Safety Department and strategic partnerships, HAKC will implement proactive safety initiatives at developments. This includes expanding community policing models, upgrading lighting and surveillance infrastructure, and improving emergency preparedness.

Goal 6 – Enhance Operations in Public Housing and HCV Programs

HAKC will work to improve leasing, inspections, rent reasonableness, customer service, and compliance. Improvements will include staff training, monitoring systems, and updated procedures aligned with HUD regulations and quality standards.

Goal 7 – Contract and Procurement Management

HAKC will continue to monitor and improve its procurement systems to ensure transparency, equity, and compliance. Updates will include revised policies,

training for staff, and improved monitoring tools to enhance vendor oversight and contracting efficiency.

Goal 8 – Maintenance Improvements

This Maintenance Management Improvement Plan is designed to improve key metrics affecting HAKC's PHAS scores, with a particular focus on Management, Occupancy, and financial categories. The goal is to enhance operational efficiency through targeted improvements in maintenance staffing, workflows, unit turn processes, and quality control.

Maintenance Team Optimization

- Assess skills, align compensation, and create a support-driven structure for the maintenance team.
- Implement daily oversight through a maintenance lead at each site.
- Develop training programs and career pathways, especially for Section 3 hires.
- Partner with trade organizations for upskilling opportunities.

Quality Control (QC) Program

- Launch a detailed QC protocol to review work orders, assess repair quality, and enforce accountability.
- Inspect 10% of work orders monthly and create follow-up procedures for failed inspections.
- Maintain records of inspections, corrective actions, and performance reviews.

Corrective Action Plan for Unit Turns

- Understaffing (17% short): Labor gap analysis, temp hiring, cross-training, and central oversight of unit turns.
- Inventory Shortages: Standardized supply lists, bulk purchasing, automated inventory alerts.
- Delayed/Inaccurate Vacancy Reporting: Real-time tracking tools, training on vacancy codes, regular audits, and pipeline review meetings.

Key Unit Turn KPIs

- Avg. Turn Time \leq 21 days
- 95% Units Turned on Schedule
- Inventory Fill Rate \geq 90%
- Vacancy Data Accuracy \geq 98%

Goal 9 – Technology and Systems Improvements

HAKC will enhance its management information systems to improve data integrity, interdepartmental coordination, and resident services. This includes expanded use of cloud platforms, mobile inspections, resident portals, and cybersecurity protocols.

Goal 10 – Promote Self-Sufficiency, Education, Homeownership, and Wellness

HAKC will continue promoting self-sufficiency through FSS, ROSS, and Choice Neighborhood programming. HAKC will promote new homeownership pathways by doing quarterly home ownership orientations, promoting financial literacy classes, and small business entrepreneurship classes.

HAKC conducts weekly financial literacy and entrepreneurship classes. These classes provide an enlightening and educational experience for those wishing to become homeowners and for those wanting to start their own businesses.

Participants in our ROSS program and our Choice Endowment program will work with service coordinators to set goals. The service coordinators will use our connections with community partners to connect participants to the appropriate resource that is congruent with their goals.

Goal 11 – Policy and Procedure Updates

HAKC will regularly review and revise its policies to ensure regulatory compliance, promote equity, and reflect agency priorities. This includes the ACOP, HCV Admin Plan, and departmental SOPs.

Appendix A – RAD Management and Operations Overview

The Housing Authority of Kansas City, Missouri (HAKC) will be converting a portion of its Public Housing portfolio to Project Based Vouchers under the guidelines of H-2019-09 PIH Notice 2019-23 (HA) and any successor Notices (the RAD Notice). The RAD conversions will require changes to the HAKC's Admissions and Continued Occupancy Policy (ACOP) and/or Section 8 Administrative Plan: these changes would include those items indicated under **Sections 1.6.A and 1.6.B. of the RAD Notice** which are appended to this Attachment.

Additionally, upon conversion to Project Based Vouchers, the HAKC will adopt the resident rights, participation, waiting list and grievance procedures listed in Section 1.6.C and 1.6.D of the RAD Notice, and Joint Housing Notice H-2016-17/PIH-2016-17. These resident rights, participation, waiting list and grievance procedures are also appended to this Attachment.

The HAKC certifies that all proposed RAD conversions will comply with all applicable site and neighborhood standards, and the site(s) will be suitable from the standpoint of facilitating and furthering full compliance with the applicable provisions of Title VI of the Civil Rights Act of 1964, Title VIII of the Civil Rights Act of 1968, Executive Order 11063, and HUD regulations issued pursuant thereto. Reviews will be completed with respect to accessibility for persons with disabilities and the design of any proposed site(s) will be consistent with applicable accessibility standards under the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, including implementing regulations at 24 C.F.R. 8.4(b)(5), and the American with Disabilities Act.

RAD was designed by HUD to assist in addressing the capital needs of public housing by providing the HAKC with access to private sources of capital to repair and preserve its affordable housing assets. Please be aware that upon conversion, the Housing Authority's Capital Fund Budget will be reduced by the pro rata share of Public Housing Developments converted as part of the Demonstration, and that the HAKC may also borrow funds to address their capital needs.

Significant Amendment Definition

As part of the Rental Assistance Demonstration (RAD), the HAKC is redefining the definition of a substantial deviation from the PHA Plan to exclude the following RAD-specific items:

- a. The decision to convert to either Project Based Rental Assistance (PBRA) or Project Based Voucher (PBV) assistance;
- b. Changes to the Capital Fund Budget produced as a result of each approved RAD Conversion, regardless of whether the proposed conversion will include use of additional Capital Funds;
- c. Changes to the construction and rehabilitation plan for each approved RAD conversion; and

- d. Changes to the financing structure for each approved RAD conversion.

Chouteau Court Replacement Housing Phase 6 – Brookwood at Antioch (Chouteau Court CNI Phase 6) was the first RAD conversion to be completed by HAKC. Construction was completed on June 28, 2023. Villa Del Sol was the second RAD conversion to be completed by HAKC. Construction was completed on April 3, 2024. Sam Rodgers Place (Chouteau Court CNI Phase 7) was the third RAD conversion to be completed by HAKC. Construction was completed on June 11, 2024. Long-term operations of the RAD units are subject to the recorded RAD Control Agreement.

A. Public Housing Developments selected for RAD under HAKC Existing Portfolio Reservation*

*(*subject to RAD Application Requirements including Resident Meetings and comment, and Board Approval)*

Development #1A

<u>Name of Public Housing Project:</u>	<u>PIC Development ID:</u>	<u>Conversion type (i.e., PBV or PBRA):</u>	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>
Cardinal Ridge	MO002000037	PBV	No
<u>Total Units:</u>	<u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u>	<u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</u>	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant attributable to the Project, if known):</u>
Public Housing Units: 69 Non-PH Units: 91 Total Units: 160	Family, Senior	Family, Senior	\$109,643
<u>Bedroom Type</u>	<u>Number of Units Pre-Conversion</u>	<u>Number of Units Post-Conversion</u>	<u>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</u>
One Bedroom	45	45	N/A
Two Bedroom	18	18	N/A
Three Bedroom	6	6	N/A
Four Bedroom	0	0	N/A
Five Bedroom	0	0	N/A
<p>Designated Housing Changes: Cardinal Ridge currently has a General Occupancy designation. HAKC may adopt a PBV site-based wait list with a Senior preference for the 59 public housing units located in the development's Senior Manor building upon conversion to PBV. Any preferences will be adopted in compliance with requirements of 24 CFR 982.207 and included in the Section 8 Administrative Plan.</p> <p>RAD/Section 18 Construction Blend: Should the development qualify, and it be proven beneficial for the long-term financial feasibility of the development, HAKC may partially dispose of the project through Section 18 under the RAD/Section 18 Blend and replace the specified number of units on-site with PBVs set at HAKC Payment Standards/Fair Market Rents. The balance of public housing units not disposed of through Section 18 will convert to PBV or PBRA at the pre-determined site-specific RAD Contract Rents.</p> <p>Chouteau Court Units under HUD Converted Awaiting Transfer (CAT) Agreement: Funding for 5 units from the now demolished Chouteau Court public housing development remains preserved under a CAT agreement. Upon completion of Chouteau Court Replacement Housing Phase 7 (Sam Rodgers Place), HAKC will have met the required number of replacement units and replacement bedrooms of the Chouteau Court replacement housing plan under its Choice Neighborhoods Implementation grant. HAKC may consider placement of these 5 remaining units at Cardinal Ridge, subject to all HUD requirements and approval, as well as feasibility of such placement.</p>			

Development #2A

<u>Name of Public Housing Project:</u>	<u>PIC Development ID:</u>	<u>Conversion type (i.e., PBV or PBRA):</u>	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>
North Park Place (Willow Glen Apartments)	MO002000042	PBV	Transfer of Assistance may be considered as part of the RAD Conversion and will be consistent with the Consolidated Plan and subject to HUD review and approval.
<u>Total Units:</u>	<u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u>	<u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</u>	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant attributable to the Project, if known):</u>
Public Housing Units: 21 Non-PH Units: 35 Total Units: 56	Family	Family	\$38,369
<u>Bedroom Type</u>	<u>Number of Units Pre-Conversion</u>	<u>Number of Units Post-Conversion</u>	<u>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</u>
One Bedroom	9	9	N/A
Two Bedroom	12	12	N/A
Three Bedroom	0	8	N/A
Four Bedroom	0	0	N/A
Five Bedroom	0	0	N/A
<p>Use of HCV Assistance for Temporary Relocation or Voluntary Permanent Relocation: HAKC may decide to issue HCV assistance to public housing residents affected by the RAD conversion. Doing so will require adoption of a selection preference for such families in the Section 8 Administrative Plan. Upon adoption of the revised Administrative Plan, HAKC may employ the preference and select the affected families from its HCV waiting list.</p> <p>RAD/Section 18 Construction Blend: Should the development qualify, and it be proven beneficial for the long-term financial feasibility of the development, HAKC may partially dispose of the project through Section 18 under the RAD/Section 18 Blend and replace the specified number of units on-site with PBVs set at HAKC Payment Standards/Fair Market Rents. The balance of public housing units not disposed of through Section 18 will convert to PBV or PBRA at the pre-determined site-specific RAD Contract Rents.</p>			

Development #3A

<u>Name of Public Housing Project:</u> Pemberton Heights	<u>PIC Development ID:</u> MO002000025	<u>Conversion type (i.e., PBV or PBRA):</u> PBV	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u> No
<u>Total Units:</u> Public Housing Units: 120 Non-PH Units: 0 Total Units: 120	<u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u> Elderly/Disabled	<u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</u> PBV site-based waitlist preference for Senior and/or Persons with Disabilities	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant attributable to the Project, if known):</u> \$367,927
<u>Bedroom Type</u>	<u>Number of Units Pre-Conversion</u>	<u>Number of Units Post-Conversion</u>	<u>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</u>
One Bedroom	115	115	N/A
Two Bedroom	5	5	N/A
Three Bedroom	0	0	N/A
Four Bedroom	0	0	N/A
Five Bedroom	0	0	N/A
<p>Designated Housing Changes: Pemberton Heights currently has an Elderly/Disabled housing designation. HAKC may establish a PBV site-based wait list with preferences for Seniors and/or Persons with Disabilities for the development upon conversion to PBV. Any preferences will be adopted in compliance with requirements of 24 CFR 982.207 and included in the Section 8 Administrative Plan.</p> <p>RAD/Section 18 Construction Blend: Should the development qualify, and it be proven beneficial for the long-term financial feasibility of the development, HAKC may partially dispose of the project through Section 18 under the RAD/Section 18 Blend and replace the specified number of units on-site with PBVs set at HAKC Payment Standards/Fair Market Rents. The balance of public housing units not disposed of through Section 18 will convert to PBV or PBRA at the pre-determined site-specific RAD Contract Rents.</p>			

Development #4A

<u>Name of Public Housing Project:</u>	<u>PIC Development ID:</u>	<u>Conversion type (i.e., PBV or PBRA):</u>	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>
Brush Creek	MO00200002_	PBV	No
<u>Total Units:</u>	<u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u>	<u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</u>	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant attributable to the Project, if known):</u>
Public Housing Units:135 Non-PH Units: 0 Total Units: 135	Elderly/Disabled	PBV site-based waitlist preference for Senior and/or Persons with Disabilities	\$377,266
<u>Bedroom Type</u>	<u>Number of Units Pre-Conversion</u>	<u>Number of Units Post-Conversion</u>	<u>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</u>
One Bedroom	135	135	N/A
Two Bedroom	0	0	N/A
Three Bedroom	0	0	N/A
Four Bedroom	0	0	N/A
Five Bedroom	0	0	N/A
<p>Designated Housing Changes: Brush Creek currently has an Elderly/Disabled housing designation. HAKC may establish a PBV site-based wait list with preferences for Seniors and/or Persons with Disabilities for the development upon conversion to PBV. Any preferences will be adopted in compliance with requirements of 24 CFR 982.207 and included in the Section 8 Administrative Plan.</p> <p>RAD/Section 18 Construction Blend: Should the development qualify, and it be proven beneficial for the long-term financial feasibility of the development, HAKC may partially dispose of the project through Section 18 under the RAD/Section 18 Blend and replace the specified number of units on-site with PBVs set at HAKC Payment Standards/Fair Market Rents. The balance of public housing units not disposed of through Section 18 will convert to PBV or PBRA at the pre-determined site-specific RAD Contract Rents.</p>			

B. Public Housing Development(s) selected for substitution in an amendment of the existing HAKC RAD Portfolio Reservation if the above developments do not move forward or if there are surplus RAD units available in the Reservation, or for inclusion in a new RAD Portfolio Reservation request to HUD*.

*(*subject to RAD Application Requirements including Resident Meetings and comment, and Board Approval)*

Alternatively, HAKC may seek to utilize the Faircloth-to-RAD provision to reserve RAD conversion authority without the use of a Portfolio Award*.

**Faircloth to RAD transactions are subject Board Approval and an alternative set of required resident notification and engagement procedures.*

Development #1B

<u>Name of Public Housing Project:</u>	<u>PIC Development ID:</u>	<u>Conversion type (i.e., PBV or PBRA):</u>	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u> Transfer of Assistance may be considered as part of the RAD Conversion and will be consistent with the Consolidated Plan and subject to HUD review and approval.
West Bluff	MO002000008	PBV	
<u>Total Units:</u>	<u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u>	<u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</u>	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant attributable to the Project, if known):</u> \$ _____
Public Housing Units: 99 Non-PH Units: 0 Total Units: 99	Family	Family	
<u>Bedroom Type</u>	<u>Number of Units Pre-Conversion</u>	<u>Number of Units Post-Conversion</u>	<u>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</u>
One Bedroom	15	TBD	TBD
Two Bedroom	40	TBD	TBD
Three Bedroom	32	TBD	TBD
Four Bedroom	8	TBD	TBD
Five Bedroom	4	TBD	TBD
<p>Choice Neighborhoods: HAKC was awarded a HUD Choice Neighborhoods Planning Grant for West Bluff and the surrounding Westside neighborhood in 2023. HAKC anticipates completing the West Bluff / Westside Choice Transformation Plan and applying for a HUD Choice Neighborhoods Implementation Grant in September 2025. If awarded, HAKC will pursue the RAD conversion of the West Bluff public housing units and their replacement in new mixed-income developments on the West Bluff site and possibly in one or more offsite locations.</p> <p>Use of HCV Assistance for Temporary Relocation or Voluntary Permanent Relocation: HAKC may decide to issue HCV assistance to public housing residents affected by the RAD conversion. Doing so will require adoption of a selection preference for such families in the Section 8 Administrative Plan. Upon adoption of the revised Administrative Plan, HAKC may employ the preference and select the affected families from its HCV waiting list.</p> <p>RAD/Section 18 Construction Blend: Should the development qualify, and it be proven beneficial for the long-term financial feasibility of the development, HAKC may partially dispose of the project through Section 18 under the RAD/Section 18 Blend and replace the specified number of units on-site with PBVs set at HAKC Payment Standards/Fair Market Rents. The balance of public housing units not disposed of through Section 18 will convert to PBV or PBRA at the pre-determined site-specific RAD Contract Rents.</p>			

Development #2B

<u>Name of Public Housing Project:</u>	<u>PIC Development ID:</u>	<u>Conversion type (i.e., PBV or PBRA):</u>	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u>
Wayne Miner (Included in Theron B. Watkins AMP & PIC #)	MO002000006	PBV	Transfer of Assistance may be considered as part of the RAD Conversion and will be consistent with the Consolidated Plan and subject to HUD review and approval.
<u>Total Units:</u>	<u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u>	<u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</u>	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant attributable to the Project, if known):</u>
Public Housing Units: 74 Non-PH Units: 0 Total Units: 74	Family	Family	\$268,028
<u>Bedroom Type</u>	<u>Number of Units Pre-Conversion</u>	<u>Number of Units Post-Conversion</u>	<u>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</u>
One Bedroom	0	0	N/A
Two Bedroom	0	0	N/A
Three Bedroom	60	60	TBD
Four Bedroom	14	14	TBD
Five Bedroom	0	0	N/A
<p>Use of HCV Assistance for Temporary Relocation or Voluntary Permanent Relocation: HAKC may decide to issue HCV assistance to public housing residents affected by the RAD conversion. Doing so will require adoption of a selection preference for such families in the Section 8 Administrative Plan. Upon adoption of the revised Administrative Plan, HAKC may employ the preference and select the affected families from its HCV waiting list.</p> <p>RAD/Section 18 Construction Blend: Should the development qualify, and it be proven beneficial for the long-term financial feasibility of the development, HAKC may partially dispose of the project through Section 18 under the RAD/Section 18 Blend and replace the specified number of units on-site with PBVs set at HAKC Payment Standards/Fair Market Rents. The balance of public housing units not disposed of through Section 18 will convert to PBV or PBRA at the pre-determined site-specific RAD Contract Rents.</p>			

Development #3B

<u>Name of Public Housing Project:</u> Willow Glen Townhomes	<u>PIC Development ID:</u> MO002000040	<u>Conversion type (i.e., PBV or PBRA):</u> PBV	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u> Transfer of Assistance may be considered as part of the RAD Conversion and will be consistent with the Consolidated Plan and subject to HUD review and approval.
<u>Total Units:</u> Public Housing Units: 15 Non-PH Units: 30 Total Units: 45	<u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u> Family	<u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</u> Family	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant attributable to the Project, if known):</u> \$32,868
<u>Bedroom Type</u>	<u>Number of Units Pre-Conversion</u>	<u>Number of Units Post-Conversion</u>	<u>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</u>
One Bedroom	0	0	N/A
Two Bedroom	7	7	N/A
Three Bedroom	8	8	N/A
Four Bedroom	0	0	N/A
Five Bedroom	0	0	N/A
<p>Use of HCV Assistance for Temporary Relocation or Voluntary Permanent Relocation: HAKC may decide to issue HCV assistance to public housing residents affected by the RAD conversion. Doing so will require adoption of a selection preference for such families in the Section 8 Administrative Plan. Upon adoption of the revised Administrative Plan, HAKC may employ the preference and select the affected families from its HCV waiting list.</p> <p>RAD/Section 18 Construction Blend: Should the development qualify, and it be proven beneficial for the long-term financial feasibility of the development, HAKC may partially dispose of the project through Section 18 under the RAD/Section 18 Blend and replace the specified number of units on-site with PBVs set at HAKC Payment Standards/Fair Market Rents. The balance of public housing units not disposed of through Section 18 will convert to PBV or PBRA at the pre-determined site-specific RAD Contract Rents.</p>			

Development #4B

<u>Name of Public Housing Project:</u> Beacon Park	<u>PIC Development ID:</u> MO002000043	<u>Conversion type (i.e., PBV or PBRA):</u> PBV	<u>Transfer of Assistance: (if yes, please put the location if known, and # of units transferring)</u> Transfer of Assistance may be considered as part of the RAD Conversion and will be consistent with the Consolidated Plan and subject to HUD review and approval.
<u>Total Units:</u> Public Housing Units: 5 Non-PH Units: 40 Total Units: 45	<u>Pre- RAD Unit Type (i.e., Family, Senior, etc.):</u> Family	<u>Post-RAD Unit Type if different (i.e., Family, Senior, etc.)</u> Family	<u>Capital Fund allocation of Development: (Annual Capital Fund Grant attributable to the Project, if known):</u> \$11,319
<u>Bedroom Type</u>	<u>Number of Units Pre-Conversion</u>	<u>Number of Units Post-Conversion</u>	<u>Change in Number of Units per Bedroom Type and Why (De Minimis Reduction, Transfer of Assistance, Unit Reconfigurations, etc.)</u>
One Bedroom	0	0	N/A
Two Bedroom	2	2	N/A
Three Bedroom	3	3	N/A
Four Bedroom	0	0	N/A
Five Bedroom	0	0	N/A
<p>Use of HCV Assistance for Temporary Relocation or Voluntary Permanent Relocation: HAKC may decide to issue HCV assistance to public housing residents affected by the RAD conversion. Doing so will require adoption of a selection preference for such families in the Section 8 Administrative Plan. Upon adoption of the revised Administrative Plan, HAKC may employ the preference and select the affected families from its HCV waiting list.</p> <p>RAD/Section 18 Construction Blend: Should the development qualify, and it be proven beneficial for the long-term financial feasibility of the development, HAKC may partially dispose of the project through Section 18 under the RAD/Section 18 Blend and replace the specified number of units on-site with PBVs set at HAKC Payment Standards/Fair Market Rents. The balance of public housing units not disposed of through Section 18 will convert to PBV or PBRA at the pre-determined site-specific RAD Contract Rents.</p> <p>Chouteau Court Units under HUD Converted Awaiting Transfer (CAT) Agreement: Funding for 5 units from the now demolished Chouteau Court public housing development remains preserved under a CAT agreement. Upon completion of Chouteau Court Replacement Housing Phase 7 (Sam Rodgers Place), HAKC will have met the required number of replacement units and replacement bedrooms of the Chouteau Court replacement housing plan under its Choice Neighborhoods Implementation grant. HAKC may consider placement of these 5 remaining units at Beacon Park, subject to all HUD requirements and approval, as well as the feasibility of such placement.</p>			

Special Provisions Affecting Conversions to PBVs

(H-2019-09 PIH Notice 2019-23 (HA), REV-4 Section 1.6.A & 1.6.B)

The “special” requirements applicable to public housing projects converting assistance to long-term PBV assistance under the First Component of the Rental Assistance Demonstration (RAD), with reference to the affected statute and/or regulation, where applicable, are grouped into four categories: **Project Selection, Contract Terms, Resident Rights and Participation, and Other Miscellaneous Provisions**. All other regulatory and statutory requirements of the PBV program in 24 CFR part 983 and section 8(o)(13) of the Act apply, including environmental review, lead-based paint requirements, Davis-Bacon, and fair housing requirements.

So as to facilitate the uniform treatment of residents and units at a RAD-converting Project (Covered Project), any non-RAD PBV units located in the Covered Project shall be subject to the same waivers and alternative requirements where noted below.

Finally, the Housing Opportunity Through Modernization Act of 2016 (HOTMA) and HUD’s implementation notices³⁰ (“HOTMA Implementation Notice”) modified the PBV program in ways that partially or completely obviate the need for certain prior waivers or alternative requirements adopted in RAD. These are noted below.

A. PBV Project Selection.

1. **PBV Percentage Limitation.** Covered Projects do not count against the percentage limitation applicable to the PBV program. The HOTMA Implementation Notice excludes formerly assisted properties from the percentage limitation.

For any Covered Projects not otherwise covered under the HOTMA Implementation Notice, including transfers of assistance to a new location, HUD is waiving section 8(o)(13)(B) of the Act as well as 24 CFR § 983.6 with respect to Covered Projects. As a result, a PHA that is administering RAD PBV assistance does not take the RAD PBV into consideration when calculating the percent limitation for any non-RAD PBV actions that are subject to the percent limitation. In other words, RAD PBV is excluded from both the numerator and the denominator when calculating the percent of vouchers that may be project-based for non-RAD PBV.

2. **Cap on the Number of PBV Units in Each Project.** There is no cap on the number of units that may receive RAD PBV assistance in each project. Under the HOTMA Implementation Notice, certain formerly assisted properties are excepted from the project cap. For any Covered Projects not covered under the HOTMA Implementation Notice, including transfers of assistance to a new location, HUD is waiving section 8(o)(13)(D) of the Act, as well as related provisions of 24 CFR §§ 983.56, 983.257(b), 983.262(a) and (d). Accordingly, units under the contract may not be “excepted” for a specified purpose.

³⁰ See "January 18, 2017 HOTMA implementation notice, 82 Fed. Reg. 5458," and the "July 14, 2017 technical correction and clarification notice, 82 Fed.

Reg. 32461." Also see Notice PIH 2017-21.

3. **Owner Proposal Selection Procedures.** In addition to situations already covered under the HOTMA Implementation Notice (e.g., attaching PBV assistance to PHA- owned units that were formerly assisted under the public housing program), HUD is waiving 24 CFR § 983.51 so that a RAD PBV HAP contract is never subject to competitive selection requirements. With respect to site selection standards, HUD requires compliance with the site selection standards as set forth in this Notice.
4. **Site selection – Compliance with PBV Goals, section 8(o)(13)(C)(ii) of the Act and 24 CFR § 983.57(b)(1) and (c)(2).** HUD waives these provisions having to do with deconcentration of poverty and expanding housing and economic opportunity, for the existing site. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

B. PBV Contract Terms.

1. **Length of Contract.** Covered Projects shall have an initial HAP Contract term of at least 15 years (up to 20 years upon request of the Project Owner and with approval by the administering Voucher Agency). To implement this provision, HUD is specifying alternative requirements for section 8(o)(13)(F) of the Act (which permits a minimum term of one year) as well as 24 CFR § 983.205(a) (which governs contract term). Project Owners are required to make available for occupancy by eligible tenants the number of assisted units under the terms of the contract and may not reduce the number of assisted units without written HUD approval. Any HUD approval of a PHA's request post-conversion to reduce the number of assisted units under the contract is subject to conditions that HUD may impose. MTW agencies may not alter this requirement.
2. **Mandatory Contract Renewal.** In accordance with the RAD Statute, at or prior to the expiration of the initial contract and each renewal contract, the administering Voucher Agency must offer, and the Project Owner must accept, renewal of the contract subject to the terms and conditions applicable at the time of renewal and the availability of appropriations each year for such renewal. The renewal contract(s) shall be for the prescribed number and mix of units but may, upon request of the Project Owner and subject to HUD and Contract Administrator approval, be on one or more transfer of assistance sites in lieu of the project site subject to the expiring contract. Consequently, section 8(o)(13)(G) of the Act, as well as 24 CFR § 983.205(b), governing the PHA discretion to renew the contract, will not apply to the extent that these provisions make renewal or extension decisions purely discretionary. However, Contract Administrators and Project Owners may choose to extend the initial HAP Contract term consistent with these provisions and are encouraged to do so a minimum of one year prior to the expiration of the contract so as to avoid unnecessary notice to residents per 24 CFR 983.206. The ability to extend the HAP Contract term

consistent with these provisions does not negate, in any way, the mandatory renewal provision detailed in the first sentence of this paragraph. MTW agencies may not alter this requirement.

3. **Ownership or Control.** This section has been moved to Section [1.4.A.11 of the RAD Notice](#)
4. **RAD Use Agreement.** This section has been moved to Section [1.4.A.13 of the RAD Notice](#)
5. **Initial Contract Rent Setting.** No additional or incremental funding is associated with this Demonstration. HUD has calculated initial contract rents for every public housing project based on each project's subsidy under the public housing program. All RAD applications, including applications for Portfolio Awards, will have initial contract rents based on their "RAD rent base year" described in [Attachment 1C](#). PHAs have additional discretion in establishing initial contract rents using the following flexibilities:
 - a. **MTW Fungibility** (Not Applicable to HAKC)
 - b. **Rent Bundling.** Subject to HUD approval, PHAs may adjust subsidy (and initial contract rents) across multiple projects as long as the PHA does not exceed the aggregate subsidy for all of the projects the PHA has submitted for conversion under RAD. For example, assume that a PHA is considering bundling two identical projects, both consisting of 100 units. In Project A, the contract rent is \$500; and in Project B, the contract rent is \$600. The PHA could bundle the two projects such that the initial contract rents for both projects will be \$550. This use, which HUD refers to as "bundled" rents, can occur under the following scenarios:
 - i. When a PHA is converting two or more properties within its public housing portfolio. The execution and effective date of the HAP Contract for the donor HAP Contract must occur prior to or simultaneous with the effective date of the recipient HAP Contract;
 - ii. When PHAs have formed a Partnership in accordance with Section 1.5.M and are bundling rents between two or more converting projects. The execution and effective date of the HAP Contract for the donor HAP Contract must occur prior to or simultaneous with the effective date of the recipient HAP Contract; and
 - iii. When a PHA bundles rents between a converting project and non-RAD Project-Based Vouchers. In such a case, the PHA must use its own voucher funding to supplement the higher RAD rent that is being offset by the lower PBV rent for the non-RAD PBV project or projects; no additional voucher funding will be provided through RAD. HUD will review the rents proposed for the non-RAD PBV HAP Contract to ensure

that the PHA does not exceed the aggregate subsidy otherwise available for all of the rent-bundled projects. Except as provided in section 1.6.B.d

below, the execution and effective date of the HAP Contract for the donor project must occur prior to or simultaneous with the effective date of the recipient HAP Contract. The owner of the property with the non-

RAD PBV HAP Contract must request an initial rent (or redetermined rent if the contract has already been executed) in accordance with 24 CFR §§ 983.301(b)(3) and 983.302 that reflects the amount approved by

HUD. To ensure that aggregate HAP costs do not exceed the costs incurred absent this provision, the owner of the property with the non-RAD PBV HAP Contract must agree not to request, in accordance with

24 CFR § 983.301(b)(3), a redetermined rent that exceeds the OCAF-adjusted rent. This OCAF limitation is in addition to the existing PBV rent limitations in 24 CFR § 983.301(b) more generally. The donor HAP

Contract must have a remaining contract term at least as long as the recipient HAP Contract.

- iv. Where an Agreement to enter into a HAP Contract (AHAP) is used on the non-RAD PBV HAP Contract and the RAD and non- RAD PBV projects are subject to a single financing, the execution and effective date of the AHAP for the donor HAP Contract must occur prior to or simultaneous with the conversion of the recipient HAP Contract. The recipient RAD PBV HAP Contract will include rent schedules for both unadjusted rents and the anticipated rent bundled rents. The unadjusted rents are the initial effective rents for the RAD PBV recipient project. At the completion of rehab/construction of the donor project, where the terms of the AHAP have been satisfied and the PHA and owner of the donor property are ready to execute a HAP contract, the cost-neutral application of the bundled rents will occur. 1) the HAP for the non-RAD PBV HAP Contract will be determined based on the initial rent, which is the PBV rent the project would have been eligible for under the PBV initial rent requirements at 24 CFR § 983.301 reduced by the amount that has been bundled to the RAD HAP Contract. 2) Upon the effective date of the non- RAD PBV donor HAP Contract, the HUD-approved rent bundled rents at the RAD HAP Contract will become effective. For example, assume two 100-unit properties that will be redeveloped under a single financing transaction, one developed under standard PBV through an AHAP and another through RAD. The estimated rents for the standard PBV are \$1,000 while the standard RAD rents are \$500. The PHA plans to rent bundle to increase the RAD rents to \$750. Construction will occur on the same timeline and the RAD PBV HAP Contract will close at the same time as the AHAP is executed. The RAD PBV HAP Contract will include unadjusted, pre-construction rents (\$500) as well as adjusted, post-construction rents (\$750). The AHAP will include estimated PBV rents, adjusted downward by \$250. When construction is completed, the post-construction rents on the RAD HAP Contract will take effect when the

donor non-RAD PBV HAP Contract becomes effective. The PHA will determine the initial contract rents for the non-RAD PBV donor project in accordance with PBV requirements and deduct \$250 from that amount.

Please note that per Section 1.13.B.5, regardless of the initial contract rents for the RAD HAP Contract, including as modified by this provision, in the year of conversion the Covered Project will only be assisted by the Operating and Capital Funds obligated to the PHA for that project.

- c. **Future Replacement Housing Factor (RHF) or Demolition Disposition Transition Funding (DDTF).**³¹ PHAs that are scheduled to receive ongoing RHF or DDTF funding (funds that have not been awarded and, with HUD permission, funds that have been awarded but not yet disbursed) may choose to forgo any ongoing RHF or DDTF grants for the purpose of offsetting an increase to the RAD rent. See [Attachment 1C](#) for the calculation of how RHF or DDTF funding may offset increased RAD rent.
- d. **PBV Site-Specific Utility Allowances.** PHAs may elect to establish a site-specific Utility Allowance for any Covered Project. HUD is waiving 24 CFR 983.2(c)(6)(iii), which requires the PHA to apply the HCV Utility Allowance schedule for PBV properties, and HUD is establishing an alternative requirement. The Utility Allowance shall be calculated consistent with Notice H 2015-04 unless PIH promulgates guidance specific to the PBV program. The Project Owner may carry out all of the responsibilities associated with Notice H 2015-04, but the PHA must ensure that the Utility Allowance is calculated correctly. This waiver and alternative requirement shall also apply to non-RAD PBV units located at the Covered Project.
- e. **Tenant-Paid Utility Savings.** Where a Covered Project will use a site-specific utility allowance as described in sub-paragraph iv. and the conversion will result in the reduction of one or more utility components (e.g., gas, water & sewer, electric) used to establish the Utility Allowance relative to the utility allowance of the Converting Project (i.e., the public housing project), HUD will permit the RAD contract rent to be increased by a portion of the utility savings. See [Attachment 1C](#) for additional detail.

Notwithstanding HUD's calculation of the initial contract rent based on

the project's subsidy under the public housing program and any modifications to the initial contract rent permitted under this Notice, initial PBV contract rents are subject to the statutory and regulatory PBV requirements governing contract rents (see 24 CFR § 983.301), (except where alternative rent caps have been approved in a MTW Plan or included in an MTW Supplement to the PHA Plan). To this effect, initial contract rents cannot exceed the lower of: (a) the reasonable rent (as defined under 24 CFR § 983.303); (b) an amount determined by the PHA, not to exceed 110 percent of the applicable FMR (or applicable exception payment standard, or rent cap approved in an MTW Plan or included in an MTW Supplement to the PHA Plan), minus any utility allowance; or (c) the rent requested by the owner.

6. **Method of Adjusting Contract Rents.** Contract rents will be adjusted only by HUD's OCAF (which is applied only to the portion of the rent not attributable to debt service) at each anniversary of the HAP Contract, subject to the availability of appropriations for each year of the contract term.³² As such, section 8(o)(13)(I) of the Act and 24 CFR §§ 983.301 and 983.302, concerning rent determinations, shall not apply when adjusting rents. The rent to owner may at no time exceed the reasonable rent charged for comparable unassisted units in the private market, as determined by the Contract Administrator in accordance with 24 CFR § 983.303.³³ However, the rent to owner shall not be reduced below the initial rent to owner for dwelling units under the initial HAP Contract.³⁴ MTW agencies may not alter this requirement.
7. **Role of Independent Entity.** Where the Covered Project is PHA-owned in accordance with section 8(o)(11) of the Act as amended by HOTMA (see Attachment A in Notice PIH 2017-21 for guidance on PHA-owned units), in addition to the standard roles described in 24 CFR 983.59(b) (i.e., determining reasonable rents and conducting HQS inspection) the independent entity must also determine the OCAF adjustment.
8. **Transfer of Assistance.** This section has been moved to Section 1.4.A.12 of the RAD Notice.
9. **Agreement Waiver and RAD Rehab Assistance Payments.** For public housing conversions to PBV there will be no Agreement to Enter into a Housing Assistance Payments (AHAP) contract. Therefore, all regulatory references to the AHAP, including regulations under 24 CFR part 983 subpart D are waived. Instead, the PHA and Project Owner typically will enter into a HAP Contract before construction begins. During the period of Work identified in the RCC, standard HAP Contract funding procedures will be used for occupied units. Units covered under the HAP Contract that are not occupied at any point during the period of Work identified in the RCC may be eligible, subject to the conditions below, for Rehab Assistance

Payments equal to the Public Housing Operating Fund and the Capital Fund amounts that formed the basis for the calculation of initial contract rents (see [Attachment 1C](#)). During the period of rehabilitation or construction as identified in the RCC, the maximum number of units for which a Project Owner can receive RAD Rehab Assistance Payments is limited to the number of units eligible for Operating Fund or Capital Fund subsidy prior to conversion. As a result, some units in the Covered Project may not be eligible for Rehab Assistance Payments.

The Project Owner will no longer be eligible to receive RAD Rehab Assistance Payments upon the earlier of completion of the Work or expiration of the time period identified in the RCC for completion of all Work, which date is specified in the HAP contract. After such date, all units under the HAP Contract will be eligible for payment only for occupied units or for vacancy payments, as applicable.

10. **HQS Inspections.** Under current regulations at 24 CFR § 983.103(b) a unit covered under a HAP Contract must be inspected and must meet HQS before assistance can be paid on behalf of a household, unless the PHA is using HOTMA non-life threatening and alternative inspection provisions.³⁵ In addition, section 8(o)(8)(A) of the Act provides that HAP Contract units must be inspected to ensure compliance with HQS prior to payment of any assistance on behalf of a family. When Work is occurring under RAD, HUD requires that all units meet HQS no later than the date of completion of the Work as indicated in the RCC. Consequently, HUD is waiving and establishing an alternative requirement to 24 CFR § 983.103(b) and section 8(o)(8)(A) of the Act in such cases.
11. **Floating Units.** Upon the request of the owner to the Voucher Agency that will administer the Covered Project, HUD will permit PBV assistance to float among units within the project having the same bedroom size. A unit to which assistance is floated must be comparable in condition to the unit it is replacing (i.e., the unit must be of the same quality and amenities as the unit it is replacing). Assistance may float from a required UFAS accessible unit only to another UFAS accessible unit that has the same bedroom size and accessibility features. If assistance floats to a UFAS accessible unit as a reasonable accommodation for a household that had not previously been in a UFAS unit, the assistance may float back to a non-UFAS unit when there is no longer need for the reasonable accommodation provided the required number of UFAS units is maintained. Units that float are not specifically designated under the HAP Contract. Therefore, the requirements in 24 CFR § 983.203(c)

³² OCAFs are calculated and published each year by HUD in the Federal Register in

order to calculate the contract rent for the project in the following fiscal year.

³³ If the Covered Project is deemed to be PHA-owned pursuant to HUD guidance, an independent entity will need to perform the rent-setting and inspection functions set out in 24 CFR § 983.59.

³⁴ The rent to owner may fall below the initial contract rent: 1) to correct errors in calculations in accordance with HUD requirements; 2) if additional housing assistance has been combined with PBV assistance after the execution of the initial HAP Contract and a rent decrease is required pursuant to § 983.55 (Prohibition of excess public assistance); or 3) if a decrease in rent to owner is required based on changes in the allocation of responsibility for utilities between the owner and the tenant.

³⁵ See Notice PIH-2017-20 for guidance on HOTMA non-life threatening and alternative inspection provisions. that the HAP Contract provide “the location of each contract unit” and “the area of each contract unit” are waived. Instead, the HAP Contract must specify the number and type of units in the property that are designated as RAD units, including any excepted units. From the time of the initial execution of the PBV RAD HAP Contract, the property must maintain the same number and type of UFAS accessible units. Floating units are subject to all of the requirements in this Notice and the PBV regulations, including physical inspections, rent adjustments, and income-mixing requirements. The alternative requirements with respect to floating units do not apply to non-RAD PBV units.

PBV Resident Rights, Participation, Waiting List and Grievance Procedures

(H-2019-09 PIH Notice 2019-23 (HA), REV-4 Section 1.6.C)

c. PBV Resident Rights and Participation.

1. **No Rescreening of Tenants upon Conversion.** Pursuant to the RAD Statute, at conversion, current households cannot be excluded from occupancy at the Covered Project based on any rescreening, income eligibility, or income targeting. With respect to occupancy in the Covered Project, current households in the Converting Project will be grandfathered for application of any eligibility criteria to conditions that occurred prior to conversion but will be subject to any ongoing eligibility requirements for actions that occur after conversion.³⁶ Post-conversion, the tenure of all residents of the Covered Project is protected pursuant to PBV requirements regarding continued occupancy unless explicitly modified in this Notice (e.g., rent phase-in provisions). For example, a unit with a household that was over-income at time of conversion would continue to be treated as an assisted unit. Thus, Section 8(o)(4) of the 1937 Act and 24 CFR § 982.201, concerning eligibility and targeting of

2. **Right to Return.** See Section 1.4.A.5.b. and the RAD Fair Housing, Civil Rights, and Relocation Notice regarding a resident's right to return. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.
3. **Phase-in of Tenant Rent Increases.** If, purely as a result of conversion, the amount a tenant would pay for rent and utilities under the PBV program (the tenant's TTP) would increase the tenant's TTP by more than the greater of 10 percent or \$25, the rent increase will be phased in over 3 or 5 years. To implement this provision, HUD is specifying alternative requirements for section 3(a)(1) of the Act, as well as 24 CFR § 983.3 (definition of "total tenant payment" (TTP)) to the extent necessary to allow for the phase-in of tenant rent increases. A PHA must create a policy setting the length of the phase-in period at three years, five years or a combination depending on circumstances and must communicate such policy in writing to affected residents. For example, a PHA may create a policy that uses a three-year phase-in for smaller increases in rent and a five-year phase-in for larger increases in rent. This policy must be in place at conversion and may not be modified after conversion.

The method described below explains the set percentage-based phase-in a Project Owner must follow according to the phase-in period established. For purposes of this section "Calculated PBV TTP" refers to the TTP calculated in accordance with regulations at 24 CFR §5.628 and the "most recently paid TTP" refers to the TTP recorded on line 9j of the family's most recent HUD Form 50058. If a family in a project converting from Public Housing to PBV was paying a flat rent immediately prior to conversion, the PHA should use the flat rent amount to calculate the phase-in amount for Year 1 (the first recertification following conversion), as illustrated below.

Three Year Phase-in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 33% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 Annual Recertification (AR) and any Interim Recertification (IR) prior to Year 3 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and all subsequent recertifications – Full Calculated PBV TTP³⁷

Five Year Phase in:

- Year 1: Any recertification (interim or annual) performed prior to the second annual recertification after conversion – 20% of difference between most recently paid TTP or flat rent and the Calculated PBV TTP
- Year 2: Year 2 AR and any IR prior to Year 3 AR – 25% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 3: Year 3 AR and any IR prior to Year 4 AR – 33% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 4: Year 4 AR and any IR prior to Year 5 AR – 50% of difference between most recently paid TTP and the Calculated PBV TTP
- Year 5 AR and all subsequent recertifications – Full Calculated PBV TTP

Please Note: In either the three-year phase-in or the five-year phase-in, once the Calculated PBV TTP is equal to or less than the previous TTP, the phase-in ends, and tenants will pay full TTP from that point forward. MTW agencies must also implement a three or five-year phase-in for impacted residents but may alter the terms above as long as it establishes a written policy setting forth the alternative terms. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

³⁶ These protections (as well as all protections in this Notice for current households) also apply when a household is relocated to facilitate new construction or repairs following conversion and subsequently returns to the Covered Project.

4. **Family Self Sufficiency (FSS) and Resident Opportunities and Self Sufficiency Service Coordinator (ROSS-SC) programs.** Public Housing residents that are currently FSS participants will continue to participate in the PHA's FSS program.

The PHA may continue to use any FSS funds already awarded to serve those FSS participants who live in units converted by RAD. At the completion of the FSS grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. If the PHA continues to run an FSS program that serves PH and/or HCV participants, the PHA will

continue to be eligible (subject to NOFA requirements) to apply for FSS funding. Due to the program merger between PH FSS and HCV FSS that took place pursuant to the FY14 Appropriations Act (and was continued in the subsequent Appropriation Acts), no special provisions are required to continue serving FSS participants that live in public housing units converting to PBV under RAD.

However, PHAs should note that until provisions of the Economic Growth, Regulatory Relief, and Consumer Protection Act are implemented, there are certain FSS requirements (e.g., escrow calculation and escrow forfeitures) that apply differently depending on whether the FSS participant is a participant under the HCV program or a public housing resident, and PHAs must follow such requirements accordingly. All PHAs will be required to administer the FSS program in accordance with FSS regulations at 24 CFR part 984 (current, or as amended), the participants' contracts of participation, and the alternative requirements established in the "Waivers and Alternative Requirements for the FSS Program" Federal Register notice, published on December 29, 2014, at 79 FR 78100.³⁸ Further, upon conversion to PBV, if the PHA no longer has a public housing program, funds already escrowed for FSS participants shall be transferred into the HCV escrow account and be considered TBRA funds, thus reverting to the HAP account if forfeited by the FSS participant.³⁹

For information on FSS PIC reporting requirements for RAD conversions, see Notice PIH 2016-08 at <http://portal.hud.gov/hudportal/documents/huddoc?id=pih2016-08.pdf>.

Current ROSS-SC grantees will be able to finish out their current ROSS-SC grants once their housing is converted under RAD. However, once the property is converted, it will no longer be eligible to be counted towards the unit count for future ROSS-SC grants, nor will its residents be eligible to be served by future ROSS-SC grants, which, by statute, can only serve public housing residents. At the completion of the ROSS-SC grant, PHAs should follow the normal closeout procedures outlined in the grant agreement. Please note that ROSS-SC grantees may be a non-profit or local Resident Association and this consequence of a RAD conversion may impact those entities. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

5. **Resident Participation and Funding.** In accordance with Attachment 1B,

residents of Covered Projects with assistance converted to PBV will have the right to establish and operate a resident organization for the purpose of addressing issues related to their living environment and be eligible for resident participation funding. To facilitate the uniform treatment of residents and units at a Covered Project, any non- RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

6. **Resident Procedural Rights.** The following items must be incorporated into both the Section 8 Administrative Plan and the Project Owner's lease, which includes the required tenancy addendum (HUD Form 52530-c), as appropriate. Evidence of such incorporation may be requested by HUD for purposes of monitoring the program.

- a. **Termination Notification.** HUD is incorporating additional termination notification requirements to comply with section 6 of the Act for public housing projects that convert assistance under RAD and to non-RAD PBV units located at the Covered Project. In addition to the regulations at 24 CFR § 983.257 related to Project Owner termination of tenancy and eviction (which MTW agencies may not alter), the termination procedure for RAD conversions to PBV will require that PHAs provide adequate written notice of termination of the lease which shall be:

- i. A reasonable period of time, but not to exceed 30 days:
 1. If the health or safety of other tenants, Project Owner employees, or persons residing in the immediate vicinity of the premises is threatened; or
 2. In the event of any drug-related or violent criminal activity or any felony conviction;
- ii. Not less than 14 days in the case of nonpayment of rent; and
- iii. Not less than 30 days in any other case, except that if a State or local law provides for a shorter period of time, such shorter period shall apply.

³⁷ For example, where a resident's most recently paid TTP is \$100, but the Calculated PBV TTP is \$200 and remains \$200 for the period of the resident's occupancy, (i.e. no changes in income) the resident would continue to pay the same rent and utilities for which it was responsible prior to conversion. At the first recertification following conversion, the resident's contribution would increase by 33% of \$100 to \$133. At the second AR, the resident's contribution would increase by 50% of the \$66 differential to the standard TPP, increasing to \$166. At the third AR, the resident's contribution would increase to \$200 and the resident would continue to pay the Calculated PBV TTP for the duration of their tenancy.

- b. **Grievance Process.** Pursuant to requirements in the RAD Statute, HUD is establishing additional resident procedural rights to comply with section 6 of the Act.

For the termination of assistance and several other PHA determinations, PBV program rules require the PHA to provide an opportunity for an informal hearing, as outlined in 24 CFR § 982.555. RAD will specify alternative requirements for 24 CFR § 982.555(b) in part, which outlines when informal hearings are not required, to require that:

- i. In addition to reasons that require an opportunity for an informal hearing given in 24 CFR § 982.555(a)(1)(i)-(v),⁴⁰ an opportunity for an informal hearing must be given to residents for any dispute that a resident may have with respect to a Project Owner action in accordance with the individual's lease or the contract administrator in accordance with RAD PBV requirements that adversely affect the resident's rights, obligations, welfare, or status.
1. For any hearing required under 24 CFR § 982.555(a)(1)(i)-(v), the contract administrator will perform the hearing, as is the current standard in the program. The hearing officer must be selected in accordance with 24 CFR § 982.555(e)(4)(i).
2. For any additional hearings required under RAD, the Project Owner will perform the hearing.
 - ii. There is no right to an informal hearing for class grievances or to disputes between residents not involving the Project Owner or Contract Administrator.
 - iii. The Project Owner gives residents notice of their ability to request an informal hearing as outlined in 24 CFR § 982.555(c)(1) for informal hearings that will address circumstances that fall outside of the scope of 24 CFR § 982.555(a)(1)(i)-(vi).
 - iv. The Project Owner provides opportunity for an informal hearing before an eviction.

Current PBV program rules require that hearing procedures must be outlined in the PHA's Section 8 Administrative Plan.

To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered project shall be subject to the terms of this provision.

7. **Earned Income Disregard (EID).** Tenants who are employed and are currently receiving the EID exclusion at the time of conversion will continue to receive the EID after conversion, in accordance with regulations at 24 CFR § 5.617. Upon the expiration of the EID for such families, the rent adjustment shall not be subject to rent phase-in, as

described in Section 1.6.C.4; instead, the rent will automatically rise to the appropriate rent level based upon tenant income at that time.

Under the Housing Choice Voucher program, the EID exclusion is limited only to persons with disabilities (24 CFR § 5.617(b)). In order to allow all tenants (including non-disabled persons) who are employed and currently receiving the EID at the time of conversion to continue to benefit from this exclusion in the PBV project, the provision in 24 CFR § 5.617(b) limiting EID to disabled persons is waived. The waiver, and resulting alternative requirement, apply only to tenants receiving the EID at the time of conversion. No other tenant (e.g., tenants that move into the property following conversion or tenants who at one time received the EID but are not receiving the EID exclusion at the time of conversion due to loss of employment) is covered by this waiver. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

8. **Jobs Plus.** Jobs Plus grantees awarded FY14 and future funds that convert the Jobs Plus target projects(s) under RAD will be able to finish out their Jobs Plus period of performance unless significant relocation and/or change in building occupancy is planned. If either is planned at the Jobs Plus target project(s), HUD may allow for a modification of the Jobs Plus work plan or may, at the Secretary's discretion, choose to end the Jobs Plus program at that project. If the program is continued, the Project Owner must agree to continue to implement the program according to HUD's program requirements. Jobs Plus target public housing projects must enroll public housing residents into the Jobs Plus rent incentive, JPEID, prior to conversion. Any resident of the Covered Project that had not enrolled prior to conversion is not eligible to enroll in JPEID but may utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the Covered Project may voluntarily utilize Jobs Plus services that predominantly benefit the former public housing residents who resided at the target project at the time of RAD conversion.

³⁸ The funding streams for the PH FSS Program and the HCV FSS Program were first merged pursuant to the FY 2014 appropriations act. As a result, PHAs can serve both PH residents and HCV participants, including PBV participants, with FSS funding awarded under the FY 2014 FSS Notice of Funding Availability (FSS NOFA) and any other NOFA under which the combination of funds remains in the applicable appropriations act. For PHAs that had managed both programs separately and now

have a merged program, a conversion to PBV should not impact their FSS participants.

³⁹ Where the PHA maintains a public housing program, any forfeited funds that had been escrowed prior to conversion would revert to the PHA's Operating Reserves.

⁴⁰ § 982.555(a)(1)(iv) is not relevant to RAD as the tenant-based certificate program has been repealed.

⁴¹ For example, a public housing family residing in a property converting under RAD has a TTP of \$600. The property has an initial Contract Rent of \$500, with a \$50 Utility Allowance. Following conversion, the residents is still responsible for paying \$600 in tenant rent and utilities.

9. **When Total Tenant Payment Exceeds Gross Rent.** Under normal PBV rules, the PHA may select an occupied unit to be included under the PBV HAP Contract only if the unit's occupants are eligible for housing assistance payments (24 CFR § 983.53(c)). Also, a PHA must remove a unit from the contract when no assistance has been paid for 180 days because the family's TTP has risen to a level that is equal to or greater than the contract rent, plus any utility allowance, for the unit (i.e., the Gross Rent) (24 CFR § 983.258). Since the rent limitation under this Section of the Notice may result in a family's TTP equaling or exceeding the gross rent for the unit, for residents living in the Converting Project prior to conversion and who will return to the Covered Project after conversion, HUD is waiving both of these provisions and requiring that the unit for such families be placed on and/or remain under the HAP Contract when TTP equals or exceeds the Gross Rent. Further, HUD is establishing the alternative requirement that until such time that the family's TTP falls below the gross rent, the rent to the owner for the unit will equal the lesser of (a) the family's TTP, less the Utility Allowance, or (b) any applicable maximum rent under LIHTC regulations. During any period when the family's TTP falls below the gross rent, normal PBV rules shall apply. As necessary to implement this alternative provision, HUD is waiving the provisions of Section 8(o)(13)(H) of the Act and the implementing regulations at 24 CFR § 983.301 as modified by Section 1.6.B.5 of this Notice.⁴¹ In such cases, the resident is considered a participant under the program and all of the family obligations and protections under RAD and PBV apply to the resident. Likewise, all requirements with respect to the unit, such as compliance with the HQS requirements, apply as long as the unit is under HAP Contract. The PHA is required to process these individuals through the Form 50058 submodule in PIC. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

Unless a waiver is requested and approved as described below, any new

admission to the Covered Project must meet the eligibility requirements at 982.201 and require a subsidy payment at admission to the program, which means their TTP may not equal or exceed the gross rent for the unit at that time. Further, a PHA must remove a unit from the contract when no assistance has been paid for 180 days. If units are removed from the HAP contract because a new admission's TTP comes to equal or exceed the gross rent for the unit and if the project is fully assisted, HUD is imposing an alternative requirement that the PHA must reinstate the unit after the family has left the property. If the project is partially assisted, the PHA may substitute a different unit for the unit on the HAP contract in accordance with 24 CFR §983.207 or, where "floating units have been permitted, Section 1.6.B.10 of the Notice.

A PHA may request a waiver from HUD for the Covered Project in order to admit otherwise eligible families whose TTP exceeds gross rent and to allow the units those families occupy to remain under the HAP contract even if the PHA has not made a housing assistance payment for a family in 180 days.

For a Covered Project that consists of 100 percent RAD PBV units, the PHA must demonstrate that a waiver is necessary in order to avoid an undue concentration of poverty at the Covered Project. A PHA may evidence this by providing data showing, for example:

- how eligible income-certified applicants on the waiting list must be passed over because their incomes result in zero HAP at admission causing a higher concentration of poverty at the covered project; or
- how the income of newly admitted families is causing a markedly higher concentration of poverty than the PHA's non-RAD PBV projects.

The resulting impact on the property must be compared with the concentration of poverty at non-RAD PBV projects in the PHA's jurisdiction. If there are no non-RAD PBV projects in the PHA's jurisdiction, the PHA may alternatively demonstrate that the median income of families that could be admitted to the Covered Project is significantly lower than the median income of new admissions from the waiting list to the PHA's HCV program since the time of the RAD conversion.

For any other Covered Project, the PHA must demonstrate that the property contains specific units (e.g., units suitable for large families or accessible units) for which there are insufficient alternative housing

opportunities.

If the waiver is approved, the new admission[s] families covered under the waiver are participants under the program and all of the family obligations and protections under RAD and PBV apply to the family, and the unit is subject to all program requirements. Such waiver requests should be submitted to the PIH Field Office in accordance with Notice PIH 2018-16.

⁴¹ For example, a public housing family residing in a property converting under RAD has a TTP of \$600. The property has an initial Contract Rent of \$500, with a \$50 Utility Allowance. Following conversion, the residents is still responsible for paying \$600 in tenant rent and utilities.

10. **Under-Occupied Unit.** If a family is in an under-occupied unit under 24 CFR § 983.260 at the time of conversion, the family may remain in this unit until an appropriate-sized unit becomes available in the Covered Project. When an appropriate sized unit becomes available in the Covered Project, the family living in the under- occupied unit must move to the appropriate-sized unit within a reasonable period of time, as determined by the administering Voucher Agency. In order to allow the family to remain in the under-occupied unit until an appropriate-sized unit becomes available in the Covered Project, 24 CFR § 983.260 is waived for current residents remaining or returning to the Covered Project. MTW agencies may not modify this requirement. To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

PBV: Other Miscellaneous Provisions

(H-2019-09 PIH Notice 2019-23 (HA), REV-4 Section 1.6.D)

D. PBV: Other Miscellaneous Provisions

1. **Access to Records, Including Requests for Information Related to Evaluation of Demonstration.** PHAs and the Project Owner must cooperate with any reasonable HUD request for data to support program evaluation, including but not limited to project financial statements, operating data, Choice-Mobility utilization, and rehabilitation work. Please see Appendix IV for reporting units in Form HUD-50058.
2. **Ongoing PHA Board Review of Operating Budget.** The Owner must submit to the administering PHA's Board the operating budget for the Covered Project annually. The PHA's Board must confirm that the Project

Owner is making deposits into the Reserve for Replacement account in accordance with the RCC as well as assess the financial health of the Covered Project.⁴²

3. **Davis-Bacon Act and Section 3 of the Housing and Urban Development Act of 1968 (Section 3).** These sections have been moved to [1.4.A.13](#) and [1.4.A.14](#).
4. **Establishment of Waiting List.** 24 CFR § 983.251 sets out PBV program requirements related to establishing and maintaining a voucher-wide, PBV program- wide, or site-based waiting list from which residents for the Covered Project will be admitted. These provisions shall apply unless the project is covered by a remedial order or agreement that specifies the type of waiting list and other waiting list policies. The PHA shall consider the best means to transition applicants from the current public housing waiting list, including:
 - a. Transferring an existing site-based waiting list to a new site-based waiting list.
 - b. Transferring an existing site-based waiting list to a PBV program-wide or HCV program-wide waiting list.
 - c. Transferring an existing community-wide public housing waiting list to a PBV program-wide or HCV program-wide waiting list, an option particularly relevant for PHAs converting their entire portfolio under RAD.
 - d. Informing applicants on a community-wide public housing waiting list how to transfer their application to one or more newly created site-based waiting lists.

For any applicants on the public housing waiting list that are likely to be ineligible for admission to a Covered Project converting to PBV because the household's TTP is likely to exceed the RAD gross rent, the PHA shall consider transferring such household, consistent with program requirements for administration of waiting lists, to the PHA's remaining public housing waiting list(s) or to another voucher waiting list, in addition to transferring such household to the waiting list for the Covered Project.

To the extent any wait list relies on the date and time of application, the applicants shall have priority on the wait list(s) to which their application was transferred in accordance with the date and time of their application to the original waiting list.

If the PHA is transferring assistance to another neighborhood and, as a

result of the transfer of the waiting list, the applicant would only be eligible for a unit in a location which is materially different from the location to which the applicant applied, the PHA must notify applicants on the waiting list of the transfer of assistance, and on how they can apply for residency at other sites.

If using a site-based waiting list, PHAs shall establish a waiting list in accordance with 24 CFR § 903.7(b)(2)(ii)-(iv) to ensure that applicants on the PHA's public housing community-wide waiting list have been offered placement on the Covered Project's initial waiting list. In all cases, PHAs have the discretion to determine the most appropriate means of informing applicants on the public housing community-wide waiting list given the number of applicants, PHA resources, and admissions requirements of the projects being converted under RAD. A PHA may consider contacting every applicant on the public housing waiting list via direct mailing; advertising the availability of housing to the population that is less likely to apply, both minority and non-minority groups, through various forms of media (e.g., radio stations, posters, newspapers) within the marketing area; informing local non-profit entities and advocacy groups (e.g., disability rights groups); and conducting other outreach as appropriate. Any activities to contact applicants on the public housing waiting list must be conducted in accordance with the requirements for effective communication with persons with disabilities at 24 CFR § 8.6 and with the obligation to provide meaningful access for persons with limited English proficiency (LEP).⁴³

When using a site-based waiting list, PHAs should consider waiting list and transfer policies that expand opportunities for tenants seeking an emergency transfer under, or consistent with, the PHA's Emergency Transfer Plan. This includes allowing for easier moves between assisted properties.

To implement this provision, HUD is specifying alternative requirements for 24 CFR § 983.251(c)(2). However, after the initial waiting list has been established, the PHA shall administer its waiting list for the Covered Project in accordance with 24 CFR § 983.251(c). To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same Covered Project shall be subject to the terms of this provision.

A PHA must maintain any site-based waiting list in accordance with

all applicable civil rights and fair housing laws and regulations.

⁴² For PBV conversions that are not FHA-insured, a future HUD notice will describe project financial data that may be required to be submitted by a PBV owner for purposes of monitoring and evaluation, given that PBV projects do not submit annual financial statements to HUD/REAC.

5. **Mandatory Insurance Coverage.** The Covered Project shall maintain at all times commercially available property and liability insurance to protect the project from financial loss and, to the extent insurance proceeds permit, promptly restore, reconstruct, and/or repair any damaged or destroyed project property.
6. **Future Refinancing.** Project Owners must receive HUD approval for any refinancing or restructuring of secured debt during the HAP Contract term to ensure the financing is consistent with long-term preservation of the Covered Project. With respect to any financing contemplated at the time of conversion (including any permanent financing which is a conversion or take-out of construction financing), such consent may be evidenced through the RCC but HUD review of liens must be performed prior to execution.
7. **Administrative Fees for Public Housing Conversions During the Year of Conversion.** For the remainder of the Calendar Year in which the HAP Contract becomes effective (i.e., the “year of conversion”), RAD PBV projects will be funded with public housing funds. For example, if the project’s assistance converts effective July 1, 2015, the public housing ACC between the PHA and HUD will be amended to reflect the number of units under HAP Contract, but will be for zero dollars, and the RAD PBV HAP Contract will be funded with public housing money for July through December 2015. Since TBRA is not the source of funds, PHAs should not report leasing and expenses into VMS during this period, and PHAs will not receive section 8 administrative fee funding for converted units during this time.

PHAs operating an HCV program typically receive administrative fees for units under a HAP Contract, consistent with recent appropriation act references to “section 8(q) of the [United States Housing Act of 1937] and related appropriations act provisions in effect immediately before the Quality Housing and Work Responsibility Act of 1998” and 24 CFR § 982.152(b). During the year of conversion mentioned in the preceding paragraph, these provisions are waived. PHAs will not receive Section 8 administrative fees for PBV RAD units during the year of conversion.

After the year of conversion, the Section 8 ACC will be amended to include Section 8 funding that corresponds to the units covered by the Section 8 ACC. At that time, the regular Section 8 administrative fee funding provisions will apply.

8. **Choice-Mobility.** One of the key features of the PBV program is the mobility component, which provides that if the family has elected to terminate the assisted lease at any time after the first year of occupancy in accordance with program requirements, the PHA must offer the family the opportunity for continued tenant- based rental assistance, in the form of either assistance under the voucher program or other comparable tenant-based rental assistance.

If as a result of participation in RAD a significant percentage of the PHA's HCV program becomes PBV assistance, it is possible for most or all of a PHA's turnover vouchers to be used to assist those RAD PBV families who wish to exercise mobility. While HUD is committed to ensuring mobility remains a cornerstone of RAD policy, HUD recognizes that it remains important for the PHA to still be able to use tenant- based vouchers to address the specific housing needs and priorities of the community. Therefore, HUD is establishing the following alternative requirement for PHAs where, as a result of RAD, the total number of PBV units (including RAD PBV units) under HAP Contract administered by the PHA exceeds 20 percent of the PHA's authorized units under its HCV ACC with HUD: The alternative mobility policy provides that an eligible voucher agency would not be required to provide more than three-quarters of its turnover vouchers in any single year to the residents of Covered Projects. While a voucher agency is not required to establish a voucher inventory turnover cap, if such a cap is implemented, the voucher agency must create and maintain a waiting list in the order in which the requests from eligible households were received. In order to adopt this provision, this alternative mobility policy must be included in an eligible PHA's administrative plan.

To effectuate this provision, HUD is providing an alternative requirement to Section 8(o)(13)(E) of the Act and 24 CFR § 983.261(c). Please note that this alternative requirement does not apply to PBVs entered into outside of the context of RAD.

9. **Reserve for Replacement.** The Project Owner shall establish and maintain a replacement reserve in an interest-bearing account to aid in funding extraordinary maintenance and repair and replacement of

capital items in accordance with applicable regulations. The reserve must be built up to and maintained at a level determined by HUD to be sufficient to meet projected requirements. For FHA transactions, Replacement Reserves shall be maintained in accordance with the FHA Regulatory Agreement. For all other transactions, Replacement Reserves shall be maintained in a bank account or similar instrument, as approved by HUD, where funds will be held by the Project Owner or mortgagee and may be drawn from the reserve account and used subject to HUD guidelines.

10. **Initial Certifications and Tenant Rent Calculations.** The Contract Administrator uses the family's public housing tenant rent (reflected on line 10f of the family's most recent HUD Form 50058) at the date of the conversion to calculate the PBV HAP and tenant rent until the effective date of the earlier of the family's first regular or interim recertification following the date of conversion. At the earlier of the family's first regular or interim recertification, the Contract Administrator will use the family's TTP based on the recertification and the HCV utility allowance (or the PBV site- specific utility allowance, if applicable) to determine the PBV HAP and tenant rent. This means that the family pays the same tenant rent as the family was paying under the public housing program until the earlier of first regular or interim reexamination following conversion, at which point the normally applicable PBV calculation for the tenant rent becomes effective. (Under the PBV program, the monthly HAP is the rent to owner minus the tenant rent, and the tenant rent is the family TTP minus the utility allowance.) To facilitate the uniform treatment of residents and units at a Covered Project, any non-RAD PBV units located in the same property as the Covered Project shall be subject to the terms of this provision. To effectuate this provision, HUD is waiving 24 CFR 5.601 and 983.3(c)(6)(iii).

Notice H 2016-17; PIH 2016-17 (HA)

Rental Assistance Demonstration (RAD) Notice Regarding Fair Housing and Civil Rights Requirements and Relocation Requirements applicable to RAD First Component – Public Housing Conversions can be found at: https://www.hud.gov/sites/documents/16-17HSGN_16-17PIHN.PDF

⁴³ For more information on serving persons with LEP, please see HUD's Final guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (72 FR 2732), published on January 22, 2007.

Appendix B – ACOP Revisions Summary

Admissions and Continued Occupancy Policy (ACOP) Summary of Changes: 2018 vs. 2025

Summary of Key Revisions with HOTMA Integration

This document outlines the substantive changes made to the Admissions and Continued Occupancy Policy (ACOP) for the Housing Authority of Kansas City, Missouri, comparing the 2018 policy version with the 2025 draft update. Where applicable, key changes are aligned with HOTMA (Housing Opportunity Through Modernization Act) requirements per HUD guidance (PIH 2023-27).

Summary of Changes: 2018 vs. 2025

Section	Chapter 3 - Eligibility
2018 Policy	Basic criteria for age, immigration, and criminal history were outlined, with limited screening guidance.
2025 Draft:	Strengthens documentation for eligible immigration status, and introduces local preferences (e.g., for survivors of domestic violence and homelessness).
Section	Chapter 4 - Applications and Selection
2018 Policy	Relied on paper applications with limited guidance on waitlist management.
2025 Draft:	Introduces online applications, detailed waitlist procedures, and prioritization criteria for preferences.
Section	Chapter 5 - Occupancy Guidelines
2018 Policy	Provided general occupancy standards with limited transfer policy reference.
2025 Draft:	Expands unit assignment detail, references transfer needs and addresses over/under-housed scenarios.
Section	Chapter 6 - Income & TIP
2018 Policy	Explained allowable income, deductions, and rent calculations.
2025 Draft:	Fully integrates HOTMA rent calculation and income eligibility changes, including updated asset rules and income
Section	Chapter 7 - Verification
2018 Policy	Relied primarily on third-party documentation.
2025 Draft:	Follows HUD's verification hierarchy with EV usage, self-certification protocols, and safeguards for tenants.
Section	Chapter 8 - Leasing
2018 Policy	Provided basic leasing procedures.
2025 Draft:	Details lease execution, HUD addenda, and onboarding requirements.
Section	Chapter 9 - Reexaminations
2018 Policy	Outlined annual/interim processes with minimal flat rent guidance.
2025 Draft:	Adds interim reporting triggers, streamlined reexam cycles, and flat rent instructions.
Section	Chapter 10 - Pet Policy
2018 Policy	Limited to elderly/disabled housing; no clear guidance for service/assistance animals.
2025 Draft:	Defines pet types by property type, clarifies accommodation process under FHEO guidance.
Section	Chapter 11 and 12 - Other Information
2018 Policy	General guidance on community service, lease terminations, grievances, and fraud.
2025 Draft:	Expanded timelines, protections, and digital access options for appeals and VAWA transfers. Adds EV fraud detection
Section	Chapter 13 - Grievance Procedures
2018 Policy	Provided a basic structure for informal and formal grievance hearings, timelines, and rights of representation.
2025 Draft:	Clarifies steps and timelines for both informal reviews and formal hearings. Adds allowance for virtual hearings
Section	Chapter 14 - Debts (Repayment Agreements & Terminations)
2018 Policy	Covered repayment agreements and termination related to non-payment and fraud.
2025 Draft:	Strengthens criteria for when repayment agreements are permissible. Requires financial documentation and limits
Section	Chapter 15 - Community Service & Self-Sufficiency Requirements (CSSR)
2018 Policy	Offered standard CSSR guidance per HUD but lacked detail in compliance and monitoring.
2025 Draft:	Provides clearer annual compliance review and notice process. Defines valid exemptions and includes self-certification language with PHA validation. Requires residents to sign a CSSR acknowledgment form at lease-up and annual recertification.
Section	Chapter 16 - Program Integrity
2018 Policy	General reference to fraud prevention and HUD EV use.
2025 Draft:	Formalizes fraud detection protocols using the HUD EV system. Specifies investigation procedures and thresholds

Appendix C – HCV Admin Plan Summary of Changes

Outline of 2024 HCV Admin Plan Summary of Changes of Chapters 4-17

(Chapter 6 at this current time no changes were made, however changes will be added as addendum pending HOTMA implementation approval)

HCV Admin Plan 2024 Chapter 3 Summary of Changes

The following summarizes the major changes and additions: Changes Summary:

Eligibility of Students:

The section on student eligibility has been updated to reflect stricter rules regarding student independence from parents for eligibility purposes. The 2024 revision includes detailed guidance on how parental income is assessed if the student is not considered independent.

There is a more precise definition of the "independent student" criteria, including the need to consider parents' income based on their marital status (joint or individual income declarations).

The revisions also clarify the consequences for students who fail to meet these criteria, including potential denial of assistance.

EIV System Searches:

The 2024 update introduces more detailed policies regarding the use of the Enterprise Income Verification (EIV) system. It now mandates the HAKC to review the EIV Existing Tenant Search results for potential duplicative assistance before admitting applicants.

The requirement to obtain documentation from other Public Housing Authorities (PHAs) regarding prior tenancy was added, ensuring no overlapping assistance is provided.

Debts Owed to PHAs and Terminations:

A new policy requires all adult household members to sign the form HUD-52675, confirming there are no debts owed to other PHAs. The 2017 version did not have this explicit instruction in the eligibility determination process.

Denial of Assistance:

The 2024 document includes detailed updates on mandatory denial cases, specifically around drug-related criminal activity, which aligns with newer HUD guidance on Fair Housing Act compliance. There is a stronger emphasis on due process and the need for PHAs to avoid discriminatory practices when considering criminal history.

The policy on domestic violence, dating violence, and stalking victims was refined, incorporating more comprehensive documentation guidelines to protect victims' rights.

Definition of Family and Household Members:

The definition of "family" has been expanded to include various new terms such as "gender identity" and "sexual orientation," ensuring no discrimination based on these factors.

The inclusion of "family breakup" provisions has been clarified, detailing how HAKC will handle instances where families split, especially due to domestic violence or other circumstances.

Specific Deleted Content:

Certain technical definitions from the 2017 version were removed or updated for clarity and alignment with new HUD regulations, particularly in the sections related to income eligibility and student status.

These changes ensure that the Kansas City HCV plan is aligned with updated federal rules and provides more detailed guidance for both applicants and staff to follow. The revisions primarily focus on refining eligibility criteria, strengthening protections for vulnerable populations, and improving administrative processes.

HCV Admin Plan 2024 Chapter 4 Summary of Changes

Here is a detailed summary of changes in the 2024 HAKC Chapter 4 document on Applications, Waiting List, and Tenant Selection compared to the 2017 version. It includes sections where information was added, deleted, or modified, along with a summary of modifications for each section.

Introduction Section

Modification: The introductory text was revised to clarify that HAKC's policies on waiting list selection are consistent with both the Administrative and Annual Plans. The 2024 version emphasizes fair housing compliance and details HAKC's obligation to adhere to HUD requirements in accepting applications, managing waiting lists, and selecting families.

Section 4-I.B. Applying for Assistance

Addition: The 2024 document includes a reference to HUD Notice PIH 2009-36, which provides updated guidance on application processes.

Modification: The wording was adjusted to ensure that applications could be taken by phone for applicants with physical, mental, or geographical limitations. This expands the accessibility policy, ensuring all applicants have equal access to the pre-application process.

Section 4-I.C. Accessibility of the Application Process

Modification: In the 2024 version, HAKC added that applicants with Limited English Proficiency (LEP) are entitled to equal access to the application process, with policies reflecting the requirements of 24 CFR 1. This emphasizes HAKC's compliance with federal guidelines for LEP applicants.

Section 4-I.D. Placement on the Waiting List

Modification: The process for notifying ineligible applicants was shortened to a 10-business-day notification period in 2024, down from 20 days in 2017. Additionally, the 2024 document includes a procedure to notify applicants who fail to qualify for specific preferences that affect their selection position.

Section 4-II.C. Opening and Closing the Waiting List

Addition: The 2024 document specifies that HAKC may close the waiting list when the estimated waiting period reaches 24 months. This clear threshold was added to assist with waitlist management and resource allocation.

Modification: The updated policy requires public notice of list closure to be published at least 10 days before the list is closed. This procedural addition enhances transparency.

Section 4-II.D. Family Outreach

Deletion: References to specific publications for public notices, including the Kansas City Star, The Call, and Globe, were removed. Instead, the 2024 version generalizes that HAKC will use "suitable media outlets" to notify the public, emphasizing fair housing compliance.

Modification: Non-minority outreach was minimized to focus broadly on equitable outreach to underserved populations, complying with fair housing requirements.

Section 4-II.F. Updating the Waiting List

Addition: The 2024 policy clarifies that if a family's failure to respond to a waiting list update is due to a disability, HAKC must reinstate the family to their former position

upon receipt of verification. This reinforces the provision of reasonable accommodations as required by 24 CFR 982.204(c)(2).

Section 4-III.B. Selection and HCV Funding Sources

Addition: The 2024 version includes updated guidance on targeted funding sources such as Family Unification Program (FUP), Mainstream Vouchers, and Veterans Assistance of Supportive Housing (VASH), specifying that HAKC must use funding exclusively for eligible families within these programs .

Section 4-III.C. Selection Method

Modification: The 2024 document allows HAKC to use a lottery selection process in addition to the standard date and time selection method, adding flexibility in applicant selection.

Section 4-III.E. The Application Interview

Addition: The 2024 policy specifies that if applicants are missing Social Security Number (SSN) documentation, they may retain their place on the list for a specified time per HAKC's policy. This flexibility was added to support compliance with Notice PIH 2018-24.

Modification: Language on reasonable accommodation for interview attendance was added, affirming HAKC's commitment to making accommodations for applicants with disabilities who cannot attend in person.

Section 4-III.F. Completing the Application Process

Modification: The timeline for notifying families of ineligibility was reduced to 10 business days in the 2024 document, down from 30 days in 2017. Additionally, applicants who fail to meet preference criteria are now formally notified in writing that they have been returned to their original position on the waiting list.

The 2024 updates reflect greater clarity in HAKC's processes, increased transparency in public notices, improved accommodation policies, and compliance with updated HUD guidance, particularly around funding, eligibility notifications, and reasonable accommodations.

HCV Admin Plan 2024 Chapter 5 Summary of Changes

Here's a detailed summary of changes in the HAKC Chapter 5 document on Briefings and Voucher Issuance, highlighting where information was added, deleted, or modified between the 2017 and 2024 versions:

Introduction Section

Addition: In the 2024 version, the language was updated to specify that the briefing packet includes “HUD-required documents,” reinforcing compliance with HUD standards.

Modification: Language around voucher issuance timing was made clearer to state that the voucher specifies both issuance and expiration dates.

Section 5-I.A. Overview

Addition: The 2024 version explicitly mentions that mandatory briefings must be conducted for families who qualify for vouchers and introduces HUD Notice PIH 2020-32, allowing for remote briefings in specific circumstances (e.g., public health concerns, natural disasters).

Section 5-I.B. Briefing

Addition: The 2024 document adds a new “Remote Briefings” subsection that outlines when remote briefings can be used, the circumstances under which they may be requested by the family (such as childcare, transportation issues, or health concerns), and specific accessibility requirements for remote formats.

Modification: The 2024 document updates policy on attendance, now generally requiring all adult family members to attend briefings but allowing the head of household, spouse, or co-head to represent the family if others cannot attend. In 2017, only the head of household was explicitly required.

Section 5-I.C. Family Obligations

Addition: The 2024 version emphasizes that a family must not receive assistance while residing in a unit owned by a close family member unless the rental is a reasonable accommodation for a family member’s disability. This detail aligns with HUD regulations.

Modification: Clarification is added on lease violations; specifically, the 2024 version mentions that incidents related to domestic violence, dating violence, or stalking cannot be grounds for lease violation for the victim, per VAWA (Violence Against Women Act) protections.

Section 5-II.B. Determining Family Unit (Voucher) Size

Addition: The 2024 version includes a section detailing that if an additional bedroom is approved for a live-in aide, it does not allow additional bedrooms for the live-in aide’s family members, adhering to HUD guidelines. This was not specified in the 2017 version.

Modification: Updated language on the treatment of unborn children, with the 2024 document including unborn children in bedroom allocations to reflect HUD guidance.

Section 5-II.C. Exceptions to Subsidy Standards

Addition: Detailed criteria were added in 2024 for when additional bedrooms may be granted, especially for health-related needs and live-in aides, emphasizing the need for professional verification and periodic re-verification if the accommodation is health-related. The 2017 version was less specific on this process.

Deletion: The 2017 document's less defined language on "reasonable exceptions" was removed and replaced with the explicit standards outlined above.

Section 5-II.D. Voucher Issuance

Modification: The 2024 version clarifies the funding requirement, specifying that HAKC must confirm sufficient funding before issuing a voucher and that vouchers may be rescinded if funding becomes insufficient after issuance. This specificity was less clear in the 2017 document.

Section 5-II.E. Voucher Term, Extensions, and Suspensions

Addition: The 2024 version details that the initial voucher term is 60 days, with the option for one 30-day extension under specific circumstances (e.g., disability accommodation or family emergencies). This section also adds that multiple extensions require additional justification and supporting documentation, a level of specificity not present in the 2017 document.

Modification: "Suspension" policies were clarified in the 2024 version, explaining that the voucher term is paused when a Request for Tenancy Approval (RFTA) is submitted, with notification to the family on the date by which the unit must pass inspection.

Deletion: The general language about voucher expiration and reapplication was updated to specify that if the voucher expires, the family may reapply when the list is open, instead of allowing reapplication at any time.

These updates in the 2024 document generally reflect enhanced compliance with HUD policies, improved procedural clarity, and strengthened protections for participants, especially around reasonable accommodations and voucher extension policies.

HCV Admin Plan 2024 Chapter 7 Summary of Changes

Here is a detailed comparison of changes between the 2017 and 2024 versions of HAKC Chapter 7 Verification, highlighting where information was added, deleted, or modified within each section, along with a summary of modifications.

Introduction

Addition: The 2024 version references HUD Notice PIH 2023-27 as a primary source of updated verification guidance, indicating that HAKC must follow this notice along with any other HUD-issued guidance.

Deletion: The 2017 document referenced older HUD notices (e.g., PIH 2004-01, PIH 2015-02). These specific references were removed in favor of the broader HUD Notice PIH 2023-27 and general HUD guidance.

Modification: The language on information handling and records management was updated to ensure that all verification processes comply with HAKC's records management policies.

7-I.A. Family Consent to Release of Information

Addition: The 2024 version requires families to sign Form HUD-9886 only once, eliminating the need for re-signing at each reexamination, with exceptions for family members who turn 18 or new adults joining the family. This is consistent with HOTMA requirements.

Deletion: The 2017 policy required adult family members to re-sign Form HUD-9886 annually during reexaminations. This annual re-signing requirement was removed.

Modification: Policies now state that families turning 18 will be notified to sign the release form at their next reexamination. This aligns with HOTMA updates, simplifying the re-verification process for existing participants.

7-I.B. Use of Other Programs' Income Determinations

Addition: The 2024 version added a new section allowing HAKC to use income determinations from other federal means-tested programs (such as TANF, SNAP, and Medicaid) as "Safe Harbor" verifications, provided they meet HUD guidelines. If families dispute these determinations, HAKC reverts to traditional third-party verification.

Deletion: No corresponding section or policy existed in the 2017 version.

7-I.C. Streamlined Income Determinations

Addition: The 2024 document introduces streamlined income determinations for participants with fixed sources of income, such as applying cost-of-living adjustments (COLA) instead of full re-verifications annually. Full third-party verification is only required every three years.

Deletion: The 2017 document did not provide for streamlined determinations for fixed income, requiring verification at each annual reexamination.

Modification: HAKC's streamlined process applies inflationary adjustments to fixed incomes unless a family requests full verification, simplifying reexaminations for families with predictable income sources.

7-I.D. Verification Hierarchy

Addition: The 2024 document includes a verification hierarchy that prioritizes methods from highest (Up-Front Income Verification or UIV) to lowest (self-certification), specifying when each method should be used.

Deletion: The 2017 document provided a general overview of verification requirements but did not include a specific hierarchy.

Modification: HAKC now follows a structured hierarchy, ensuring that more reliable forms of verification are attempted first, with documentation of attempts in each tenant file if lesser forms are used.

7-I.E. Levels 5 and 6 Verification: Up-Front Income Verification (UIV)

Addition: The 2024 version introduced additional policies on using HUD's Enterprise Income Verification (EIV) system's Income Validation Tool (IVT), which provides projections on discrepancies for wages, unemployment, and Social Security benefits.

Deletion: The 2017 document lacked mention of the IVT and did not detail steps for addressing discrepancies found through EIV.

Modification: HAKC must now utilize the IVT and address any identified discrepancies as part of reexaminations, adding an extra layer of compliance and accuracy to income verification processes.

New Hires Report

Addition: The 2024 document requires HAKC to review the New Hires Report at each annual reexamination, except when using Safe Harbor income determinations from other federal programs, to detect recent employment changes.

Deletion: This report was not specifically mentioned in the 2017 version.

Identity Verification and Deceased Tenants Reports

Addition: The 2024 version specifies that HAKC must review these reports monthly, taking actions such as notifying next of kin if a tenant is reported deceased.

Deletion: The 2017 document did not include monthly monitoring of these reports.

Modification: This monitoring ensures timely updates and adjustments to records, especially in cases of tenant death, to prevent improper subsidy payments.

7-I.F. Level 4 Verification

Addition: The 2024 document allows combining EIV data with self-certification (known as EIV + self-certification) to streamline income calculations if the tenant agrees with EIV data, eliminating the need for traditional third-party verification.

Deletion: The 2017 version did not allow for self-certification combined with EIV data for verification purposes.

Modification: EIV data may now be used directly if self-certified by the family, reducing administrative steps for verification under certain conditions.

7-I.G. Level 3 Verification: Written, Third-Party Form

Modification: The 2024 document allows HAKC to bypass the use of a written third-party verification form in favor of oral verification if the form is not returned within 10 business days. This flexibility was not specified in the 2017 version.

7-I.H. Level 2 Verification: Oral Third-Party Verification

Addition: The 2024 policy now requires documentation for oral verification attempts, including date, time, and details of contact, if written third-party forms are not returned in 10 business days.

Deletion: The 2017 version did not require this level of documentation.

Modification: By documenting each verification attempt, HAKC demonstrates compliance and thoroughness in verification efforts.

7-I.I. Level 1 Verification: Non-Third-Party Verification (Self-Certification)

Addition: The 2024 version explicitly allows self-certification for fully excluded income, assets under \$50,000, and situations where third-party verification is impractical due to minimal impact on the tenant payment. The document requires case-by-case documentation in tenant files.

Deletion: The 2017 version allowed self-certification only as a last resort, without clearly defined criteria for when it could be used.

Modification: The policy now provides clear guidelines on when self-certification is acceptable, streamlining the process for certain low-impact verifications.

EIV Data Security and Retention

Addition: The 2024 version includes enhanced policies on EIV data security, specifying that EIV information must not be shared without the household member's written consent and adding that data should be retained no longer than three years post-termination.

Deletion: The 2017 document had general data security policies but did not specify retention timeframes or restrict sharing EIV data without explicit consent.

Modification: This addition enforces stringent data security protocols to protect tenant privacy and complies with federal data protection standards.

Summary

The 2024 updates incorporate HUD's latest guidance (PIH 2023-27), emphasizing streamlined income determinations, enhanced data security, the use of federal Safe Harbor income determinations, and a structured verification hierarchy. These changes reflect efforts to simplify administrative tasks, while reinforcing compliance with HUD requirements and protecting tenant privacy.

HCV Admin Plan 2024 Chapter 8 Summary of Changes

Here's a detailed comparison of changes in Chapter 8 of the HAKC Housing Quality Standards (HQS) and Rent Reasonableness document, specifying additions, deletions, and modifications within each section along with a summary.

Introduction

Addition: In the 2024 version, the reference to HUD's Housing Quality Standards (HQS) and the pilot demonstration on the Uniform Physical Condition Standards for Vouchers (UPCS-V) was removed, as HAKC is no longer participating in that pilot.

Deletion: The 2017 document discussed HAKC's participation in the UPCS-V pilot, with details on deviations aligned with HAKC's enhanced HQS. This was removed in the 2024 version.

Modification: The 2024 version provides a more concise introduction, focusing on HUD's requirements and HAKC's policy for biennial inspections, emphasizing inspection flexibility depending on need.

Section 8-I.A. General HUD Requirements

Addition: The 2024 document includes updated HUD references, such as HUD Notice 2003-31, and explicitly lists HUD's Housing Inspection Manual for Section 8 Housing, which wasn't explicitly mentioned in the 2017 document.

Modification: The new document clarifies that HUD’s performance and acceptability standards include specific guidance on tenant preference items and additional tenant responsibilities, which are outlined in a separate exhibit for easy reference.

Section 8-I.B. Additional Local Requirements

Addition: The 2024 version specifies temperature guidelines for the thermal environment more precisely, with a required range of 65-68°F for heating and 74°F for air conditioning.

Deletion: The previous range in the 2017 document stated a simpler “65 degrees Fahrenheit” for heating. The updated document elaborates on seasonal variations and conditions for heating and cooling standards.

Modification: Language was expanded to define HAKC’s authority to impose standards that do not adversely impact health or safety or restrict housing choice, with added emphasis on HUD approval for any stricter local standards.

Section 8-I.C. Life-Threatening Conditions

Addition: The 2024 document includes additional examples of life-threatening conditions, such as the lack of air conditioning during extreme heat, and the requirement for carbon monoxide detectors in units with gas appliances.

Deletion: The 2017 document’s list of life-threatening conditions was less detailed and did not specify carbon monoxide detectors or air conditioning as essential.

Modification: The new version of the document adds a requirement for immediate action on life-threatening issues and specifies that HAKC may terminate assistance if repairs are not completed within 24 hours. The language was revised to include measures for contacting external agencies if necessary for safety compliance.

Section 8-I.D. Owner and Family Responsibilities

Addition: The 2024 policy clarifies that tenants must maintain tenant-paid utilities in the Head of Household’s name or that of a spouse/co-head. Additionally, it defines responsibility for vermin infestations based on the housing type.

Deletion: The 2017 version did not specify these detailed requirements for utility accounts and vermin control responsibilities.

Modification: This section was reorganized to distinctly outline responsibilities between tenants and owners, providing clearer delineations for maintaining unit conditions based on family actions or tenant negligence.

Section 8-II.A. Types of Inspections

Addition: In the 2024 document, a new section was added describing the New Move-In and Special Inspections, where HAKC inspectors may conduct additional assessments for new tenants or upon request.

Modification: Regular, emergency, and biennial inspections were further clarified, with detailed timelines and procedures specified for each type. The 2024 version standardizes these procedures to ensure timely and consistent inspections.

Section 8-II.G. Rent Reasonableness Determination

Addition: The 2024 version includes more detailed guidance on comparing rents to unassisted units in the market area, explicitly referencing HUD's requirements for comparable market data.

Deletion: The 2017 version provided less specific guidance, lacking detailed criteria for what constitutes reasonable rent determinations in line with HUD guidelines.

Modification: Rent reasonableness assessment now includes structured methods for documenting rent comparisons, ensuring that adjustments reflect current market conditions and are compliant with HUD regulations.

Summary of Modifications

Overall, the 2024 updates reflect enhanced compliance with HUD guidelines, including:

Streamlined Introduction: The introduction was shortened, focusing on compliance with HUD's HQS and emphasizing HAKC's optional biennial inspection policy.

Expanded Definitions of Life-Threatening Conditions: New life-threatening conditions such as air conditioning and carbon monoxide detector requirements were added to ensure unit safety.

Clarified Responsibilities: Tenant and owner responsibilities were clarified, particularly concerning utility accounts and pest control, based on housing type.

Additional Inspection Types: New sections were added for specific inspection types, with clear procedures and standards for each.

Rent Reasonableness: The rent determination section was refined, specifying how rent comparisons should be documented and verified.

These updates improve clarity on compliance and safety standards, aligning with current HUD requirements and making the document more user-friendly.

HCV Admin Plan 2024 Chapter 9 Summary of Changes

Here's a detailed comparison of the changes in Chapter 9 of the HAKC Housing Choice Voucher (HCV) Administrative Plan on General Leasing Policies between the 2017 and 2024 versions, showing the specific sections where information was added, deleted, or modified.

Introduction

Addition: The 2024 document emphasizes that HAKC's requirements must be met in all leasing situations, adding a brief mention of HAKC's commitment to compliance with HUD's performance standards.

Deletion: The earlier introduction was more general, focusing primarily on the lease-up process from tenancy approval to the HAP contract without mentioning broader compliance initiatives.

Modification Summary: The introduction now highlights HAKC's compliance with HUD standards, setting a broader context for the leasing policies outlined in this chapter.

9-I.A. Tenant Screening

Addition: The 2024 version adds that HAKC must inform the owner or manager about rights and obligations under the Violence Against Women Act (VAWA) and specifies the prohibition on disclosing confidential information related to domestic violence, sexual assault, and human trafficking.

Deletion: The 2017 version did not include the requirement to inform owners of VAWA rights or explicitly prohibit the disclosure of information on human trafficking.

Modification Summary: This section now includes VAWA compliance obligations, enhancing tenant protections and reinforcing confidentiality standards in screening processes.

9-I.B. Requesting Tenancy Approval (RFTA)

Addition: New language in 2024 specifies that owners must certify the most recent rent amount and provide justification if the proposed rent differs. Additional certifications for lead-based paint compliance are required for pre-1978 units.

Deletion: The 2017 document lacked these rent certification and lead-based paint requirements.

Modification Summary: Enhanced certification requirements were added to ensure rent and safety compliance, aligning with HUD standards for RFTA documentation.

9-I.C. Owner Participation

Addition: The 2024 policy includes criteria for disapproving of an owner due to poor performance or conflicts of interest. It also cross-references Chapter 13 for owner qualifications.

Deletion: The 2017 version did not specify criteria for disapproval based on poor performance or conflicts.

Modification Summary: Expanded to include eligibility criteria for owner participation, ensuring owners meet standards for tenant interactions and program compliance.

9-I.D. Eligible Units

Addition: The 2024 version specifies that HAKC-owned units must be presented as a leasing option during tenant briefings, ensuring that families are aware of all available options.

Deletion: The 2017 document generally mentioned eligible units but did not specify the requirement to present HAKC-owned units in briefings.

Modification Summary: Enhanced to inform families of eligible HAKC-owned units, reinforcing transparency in unit availability and selection.

9-I.E. Lease and Tenancy Addendum

Addition: The 2024 version mandates that the HUD Tenancy Addendum is word-for-word added to leases, with the Tenancy Addendum taking precedence over any conflicting lease terms.

Deletion: The 2017 document did not explicitly state that the Tenancy Addendum overrides conflicting lease terms.

Modification Summary: This section reinforces HUD's Tenancy Addendum requirements, ensuring that lease agreements comply with HUD's legal standards.

9-I.F. Tenancy Approval

Addition: The 2024 policy specifies that tenancy approval includes meeting Housing Quality Standards (HQS) and ensuring that rent charged is reasonable. Additional language clarifies that the tenancy cannot be approved if the family share exceeds 40% of adjusted income at lease initiation.

Deletion: The 2017 version was less explicit about HQS compliance and did not require specific reference to the family share threshold for affordability.

Modification Summary: Expanded to clarify tenancy approval requirements, aligning with affordability and inspection standards.

9-I.G. HAP Contract Execution

Addition: In 2024, the policy explicitly requires both parties to sign the lease before HAP payments begin. It also specifies that HAKC must notify families of their VAWA rights after HAP contract execution.

Deletion: The 2017 document did not mention VAWA notifications or clarify the necessity of signed leases before payments.

Modification Summary: Strengthened VAWA compliance and procedural clarity for HAP contract execution, ensuring lease signing is completed and VAWA rights are communicated.

9-I.H. Changes in Lease or Rent

Addition: New language in 2024 requires the owner to notify HAKC 60 days before rent changes. Additionally, it specifies that rent increases are disallowed during the initial lease term, with HAKC completing a reasonableness determination within 10 business days.

Deletion: The 2017 version had more general guidelines on rent changes without specifying timelines for notification or processing.

Modification Summary: This section now provides clear guidance on rent adjustments and ensures timely compliance checks on proposed changes.

Summary of Modifications

The 2024 updates provide greater specificity and adherence to HUD regulations, emphasizing tenant protections, owner accountability, and procedural clarity:

VAWA Compliance: Strengthened tenant rights under VAWA, with requirements for notifying owners of these rights and prohibiting disclosure of sensitive information.

RFTA and Rent Certifications: Enhanced documentation requirements for tenancy approvals, including rent certifications and lead-paint disclosures.

Owner and Unit Eligibility: Updated to ensure owners meet standards and tenants are informed of all unit options, including HAKC-owned units.

Leasing Process Clarifications: Clearer processes for lease execution, tenancy approval, and rent changes, including set timeframes for HAKC's determinations.

These changes ensure alignment with updated HUD standards and provide tenants with better protection and transparency in the leasing process.

HCV Admin Plan 2024 Chapter 10 Summary of Changes

Here's a detailed comparison of changes in Chapter 10 of the HAKC Administrative Plan on Moving with Continued Assistance and Portability, highlighting where information was added, deleted, or modified within each section, along with a modification summary.

Introduction

Addition: The 2024 version mentions that HAKC will follow HUD's regulations governing portability and include additional VAWA protections and emergency transfers for victims of human trafficking.

Deletion: The 2017 document did not include references to VAWA or human trafficking protections specifically.

Modification Summary: Expanded to encompass HUD's updated portability regulations and protections for vulnerable families.

10-I.A. Allowable Moves

Addition: In the 2024 version, additional conditions allow moves if a family member is a victim of human trafficking. There's also language requiring the HAKC to facilitate emergency transfers per HUD regulations.

Deletion: The 2017 document allowed moves only under domestic violence, not specifically human trafficking.

Modification Summary: Expanded to provide clearer guidelines on acceptable reasons for moving under both VAWA and HUD regulations.

10-I.B. Restrictions on Moves

Addition: The 2024 document specifies that moves may be restricted if the HAKC lacks funding, in line with Notice PIH 2016-09. Further, HUD's conditions allow the denial of portability for non-residents of HAKC for up to 12 months.

Deletion: Earlier policies in 2017 were more restrictive, without specific allowances for exceptions under funding constraints.

Modification Summary: Refined policies on move restrictions and included mandatory notifications to HUD, improving compliance with updated HUD requirements.

10-I.C. Moving Process

Addition: The 2024 version introduces clearer steps for notifying the receiving PHA by email, phone, or fax, along with providing families with contact details for the receiving PHA.

Deletion: The 2017 policy lacked details on specific notification methods.

Modification Summary: Streamlined the notification process to ensure timely and organized communication with receiving PHAs for portability.

Zero HAP Families Who Wish to Move

Addition: The 2024 document provides a new section allowing zero HAP families (those not receiving subsidies) to request a move if the new unit would qualify for a subsidy.

Deletion: This section was not addressed in the 2017 document.

Modification Summary: Expanded to clarify options for zero HAP families, aligning with HUD's updated guidelines.

10-II.A. Overview of Portability

Addition: The 2024 version clarifies HAKC's role in notifying the receiving PHA of portability requests, specifying email or fax as confirmed delivery methods.

Deletion: The previous policy allowed broader methods without confirming delivery.

Modification Summary: Enhanced clarity on the initial HAKC's role in initiating portability requests, emphasizing reliable communication channels.

10-II.B. Initial HAKC Role - Allowable Moves under Portability

Addition: Specifies that the initial PHA must notify HUD within 10 business days if denying portability due to insufficient funding.

Deletion: The 2017 policy lacked a specific timeline for HUD notification.

Modification Summary: Clarified steps for handling funding-based denials of portability moves to maintain transparency with HUD.

Determining Income Eligibility

Addition: The 2024 policy requires the initial PHA to verify income eligibility in the receiving area for applicant families but not for current participants.

Deletion: The 2017 document did not differentiate between applicants and current participants in terms of income verification.

Modification Summary: Improved consistency in income eligibility determinations by distinguishing between applicants and participants.

10-II.C. Receiving PHA Role

Addition: The 2024 version includes guidance for the receiving PHA to notify the initial PHA of termination within 10 days and provides updated procedures on the use of HUD's 52665 form.

Deletion: The earlier policy lacked such notification specifics.

Modification Summary: Strengthened communication between PHAs for transparency and efficient processing of portability moves.

Summary of Modifications

The 2024 updates improve the clarity, compliance, and responsiveness of the portability and moving policies, with notable additions including:

Expanded Allowable Moves: Clearer conditions for moves related to domestic violence, human trafficking, and zero HAP families.

Refined Notification Processes: Enhanced requirements for communication between initial and receiving PHAs, specifying confirmed methods.

Funding-Based Move Restrictions: Defined criteria for funding-based restrictions on moves, aligning with HUD Notice PIH 2016-09.

These changes promote tenant protection, streamline procedures, and reinforce accountability between PHAs under portability regulations.

HCV Admin Plan 2024 Chapter 11 Summary of Changes

Here's a detailed comparison of changes in Chapter 11 of the HAKC Administrative Plan on Reexaminations, specifying the sections where information was added, deleted, or modified within each section, along with a modification summary.

Introduction

Addition: The 2024 version includes a new "Part IV: Non-Interim Reexamination Transactions," which discusses situations not requiring an interim reexamination but still necessitating reporting to HUD.

Deletion: The 2017 version did not include this additional part.

Modification Summary: The introduction now reflects the new structure with four parts, enhancing clarity on specific reexamination and reporting requirements.

11-I.A. Overview of Annual Reexaminations

Addition: The 2024 document specifies that the HAKC should determine income over the previous 12 months, with flexibility to use a streamlined income determination or safe harbor income verification from other federal programs.

Deletion: The 2017 version did not mention streamlined income determination or safe harbor verification.

Modification Summary: Expanded to include income determination options, offering more flexibility in verifying income sources.

11-I.B. Scheduling Annual Reexaminations

Addition: The 2024 version clarifies that moving to a new unit will not reset the family's annual reexamination date.

Deletion: The 2017 document did not specify the reexamination policy related to unit moves.

Modification Summary: Improved scheduling consistency by clarifying that moves do not impact reexamination timing.

11-I.C. Conducting Annual Reexaminations

Addition: The 2024 document states that the HAKC may use the Dru Sjodin National Sex Offender database to verify household members' information.

Deletion: The 2017 version did not specify the use of this database for annual reexaminations.

Modification Summary: Reinforced security by including sex offender verification during reexaminations.

11-I.E. Calculating Annual Income

Addition: The 2024 version includes detailed steps for calculating income, with options for using the EIV Income Report, HUD-50058, and family-reported data. COLA adjustments to Social Security benefits are required.

Deletion: The 2017 version offered general guidance without these calculation steps or mention of COLA adjustments.

Modification Summary: Enhanced accuracy in income calculations, with a clear, multi-step verification process.

11-I.F. Effective Dates for Annual Reexamination Changes

Addition: The 2024 document introduces policies for delays caused by families, applying increases retroactively and decreases prospectively.

Deletion: The previous document lacked specific policies on effective dates for delayed reexamination submissions.

Modification Summary: Ensures accountability by setting guidelines for delayed reexamination changes.

Part II: Interim Reexaminations

Addition: The 2024 version adds Notice PIH 2023-27 requirements, stipulating that a 10% threshold for income changes must be met before conducting an interim reexamination, with mandatory interims for decreases due to death or permanent moves.

Deletion: The 2017 policy required families to report all income changes but lacked the 10% threshold and exceptions.

Modification Summary: Clarified requirements for interim reexaminations, adding thresholds for income changes and exceptions for specific cases.

11-II.D. Effective Dates for Interim Reexamination Changes

Addition: Specifies 30 days' notice for rent increases and retroactive adjustments for rent decreases.

Deletion: The 2017 version did not include details on notice periods or retroactive adjustments.

Modification Summary: Streamlined the process for implementing interim reexamination changes, enhancing tenant clarity on effective dates.

11-III.B. Changes in Payment Standards and Utility Allowances

Addition: Added clarity on applying new payment standards at reexamination, detailing when adjustments to payment and utility standards occur.

Deletion: The previous version had minimal guidance on updating payment standards.

Modification Summary: Clarified timing for applying new payment standards to improve compliance.

Part IV: Non-Interim Reexamination Transactions

Addition: A new section in the 2024 document outlines non-interim transactions that do not change adjusted income but must still be reported to HUD. Examples include changes in hardship exemptions and adding non-family members.

Deletion: Not present in the 2017 document.

Modification Summary: Provides comprehensive reporting guidance for non-interim transactions, ensuring full HUD compliance.

Summary of Modifications

The 2024 revisions to Chapter 11 improve accuracy, compliance, and tenant protections, with changes including:

New Reporting and Reexamination Requirements: Includes new guidelines for non-interim transactions and reexamination processes based on HUD updates.

Thresholds for Interim Reexaminations: Introduced a 10% threshold for income changes, streamlining interim reexamination requirements.

Detailed Income Calculations: Adds multi-step calculation processes for annual income determinations, enhancing accuracy.

Improved Effective Date Clarity: Sets clear guidelines for when rent increases and decreases take effect, ensuring transparency.

These updates align the reexamination process with HUD requirements, enhancing procedural clarity and tenant accountability.

HCV Admin Plan 2024 Chapter 12 Summary of Changes

Here is a detailed analysis of changes between the 2017 and 2024 versions of the HAKC Administrative Plan, Chapter 12 on Termination of Assistance and Tenancy. This summary highlights where information was added, deleted, or modified, along with a modification summary for each section.

Introduction

Addition: The 2024 version clarifies the inclusion of protections under the Violence Against Women Act (VAWA) and policies on human trafficking.

Deletion: The 2017 document lacked references to specific protections related to human trafficking.

Modification Summary: The introduction now reflects the enhanced protection framework, aligning HAKC policy with HUD and VAWA standards.

12-I.B. Family No Longer Requires Assistance

Addition: In the 2024 version, policies were added specifying that if a family's income increases to where the subsidy is zero, the assistance will terminate after 180 days unless a change is reported that would increase the subsidy.

Modification Summary: Clarifies the automatic termination process for families who no longer require assistance and specifies the process for notifying HAKC about changes in circumstances.

12-I.C. Family Chooses to Terminate Assistance

Addition: The 2024 update includes instructions for written termination requests signed by the head of household.

Deletion: Earlier documents did not specify the need for a written, signed request.

Modification Summary: Adds procedural detail for families choosing to terminate assistance, formalizing the notification process.

12-I.D. Mandatory Termination of Assistance

Addition: Expanded to include protections for victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking, in alignment with VAWA.

Modification Summary: Enhanced protection measures prevent penalizing victims of violence while setting criteria for mandatory terminations due to lease violations, citizenship documentation, and criminal offenses.

12-I.E. Mandatory Policies and Other Authorized Terminations

Addition: 2024 document clarifies that HAKC cannot terminate assistance due to non-compliance with Family Self-Sufficiency obligations, per updated HUD regulations.

Modification Summary: Provides clarification on termination grounds, removing outdated policies on Family Self-Sufficiency compliance as a reason for termination.

12-II.A. Approach to Termination of Assistance

Addition: The 2024 document expands the HAKC's approach to consider alternative measures and reasonable accommodation.

Modification Summary: Emphasizes the HAKC’s discretion in determining whether to terminate assistance based on individual circumstances, enhancing support for families with unique needs.

12-II.B. Method of Termination

Addition: Specifies that terminations include refusing to enter new HAP contracts or processing portability requests, aligning with HUD regulations.

Modification Summary: Provides more precise options for termination methods based on HUD guidelines.

12-II.E. Terminations Related to Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

Addition: This section includes VAWA protections and explicitly adds human trafficking as a basis for protection under HUD notices.

Modification Summary: Reinforces tenant protections by clearly defining situations where assistance termination would not apply to victims of specific forms of violence.

12-II.F. Termination Notice

Addition: The 2024 version specifies that HAKC must provide form HUD-5382 (VAWA protections) with the termination notice and states that both family and owner must be notified of termination.

Modification Summary: Improves transparency in the termination process and ensures that households are informed of VAWA rights.

Summary of Modifications

The 2024 updates in Chapter 12 improve clarity and compliance, especially with respect to protections for vulnerable tenants:

Enhanced Protections under VAWA and Human Trafficking: Reinforces the protection framework, ensuring that victims of abuse are shielded from unjust terminations.

Clarified Grounds for Termination: Updates on mandatory and optional termination grounds provide clarity, aligning with current HUD policies.

Improved Termination Procedures: Specifies requirements for written requests and notification processes, enhancing procedural accuracy.

These modifications strengthen HAKC’s termination policies, ensuring alignment with HUD standards and increased protection for at-risk families.

HCV Admin Plan 2024 Chapter 13 Summary of Changes

Here's a detailed summary of changes in Chapter 13 of the HAKC Administrative Plan for Owners between the 2017 and 2024 versions. This breakdown shows additions, deletions, and modifications by section, along with a summary for each area.

Introduction

Modification: The 2024 introduction reaffirms the importance of owners in providing safe and affordable housing under the HCV program. There's an emphasis on owner compliance with updated HUD and HAKC policies.

Summary: The language now reinforces HAKC's expectations for owners, aligning the section with updated HUD standards.

13-I.A. Owner Recruitment and Retention

Addition: The 2024 document adds "contacting owners via emails or text to disseminate information" as part of outreach efforts.

Modification: Updated retention strategies for assisting new owners, including specific resources on inspection and leasing requirements.

Summary: Expanded communication methods and clarified retention support, emphasizing proactive owner engagement.

13-I.B. Basic HCV Program Requirements

Addition: The 2024 version specifies that owners can list available properties on or any other software HAKC accesses, replacing the previous sole reference to GoSection8.

Summary: This change provides owners with more listing options, potentially increasing visibility for their properties.

13-I.C. Owner Responsibilities

Addition: New 2024 requirement for owners to comply with the Violence Against Women Act (VAWA) when screening or terminating HCV tenants, ensuring protection for tenants affected by domestic violence.

Summary: Strengthens tenant protections by adding VAWA compliance as an owner responsibility.

13-I.D. Owner Qualifications

Addition: New requirements in 2024 for owners to certify they are not prohibited relatives before approving tenancy, and guidelines on handling deceased owners' properties.

Modification: Expanded conflict of interest criteria and clarified documentation needed for tenancy approval.

Summary: Strengthened owner qualification checks and compliance for conflict of interest, ensuring adherence to HUD rules.

13-I.E. Non-Discrimination

Modification: Updated non-discrimination policies in the 2024 document to align explicitly with fair housing standards, specifying compliance in all interactions under the HAP contract.

Summary: Reinforces HAKC's commitment to fair housing principles in owner interactions.

13-II.A. HAP Contract Overview

Modification: 2024 document emphasizes that the HAP contract outlines both HAKC and owner responsibilities clearly, particularly in relation to housing quality standards.

Summary: Clarifies mutual responsibilities under the HAP contract to ensure owners meet program standards.

13-II.C. HAP Contract Payments

Modification: Specifies that excess HAP received by owners must be returned immediately, and outlines consequences for non-compliance.

Summary: Ensures payment accuracy and accountability by requiring prompt handling of overpayments.

13-II.F. Change in Ownership / Assignment of the HAP Contract

Addition: In 2024, new procedures were added for handling HAP contracts in cases where ownership changes due to death, specifying timelines and required documentation.

Modification: Clarified the process for approving contract assignments, including a new owner's responsibility to provide evidence of ownership transfer and compliance with the HAP contract.

Summary: Establishes clear steps for ownership transfers, including in cases of death, supporting a seamless continuation of tenant support.

13-II.G. Protecting HCV Tenants at Foreclosure

Modification: Updated to reference protections for HCV tenants in cases of foreclosure, ensuring tenants are protected and informed.

Summary: Ensures tenant stability and right to remain in their homes during foreclosure.

Summary of Modifications

The 2024 updates in Chapter 13 enhance clarity, compliance, and protection for both tenants and owners:

Enhanced Tenant Protections: Integrates VAWA compliance requirements and foreclosure protections.

Detailed Owner Compliance: Adds documentation and certification requirements for ownership changes and conflict of interest.

Payment Accountability: Emphasizes the need for prompt handling of HAP overpayments, enhancing financial integrity.

These changes support tenant rights and clarify owner responsibilities, strengthening HAKC's alignment with HUD standards.

HCV Admin Plan 2024 Chapter 14 Summary of Changes

Here's a detailed analysis of changes between the 2017 and 2024 versions of the HAKC Chapter 14 on Program Integrity. This summary highlights the exact sections where information was added, deleted, or modified, along with a modification summary for each section.

Introduction

Addition: The 2024 version adds language emphasizing the importance of program integrity in preventing, detecting, and correcting errors or abuse in the Housing Choice Voucher (HCV) program.

Modification Summary: The introduction was expanded to underscore the HAKC's commitment to ethical administration and HUD compliance, setting the tone for the program integrity framework.

14-I.A. Preventing Errors and Program Abuse

Addition: The 2024 version introduces the use of the Enterprise Income Verification (EIV) system during mandatory reexaminations to prevent errors and detect program abuse. It also mandates the distribution of HUD form HUD-52675 ("Debts Owed to

PHAs and Terminations”) and requires signed acknowledgment from all adult household members.

Modification Summary: Strengthened error prevention by implementing structured verification through EIV and standardized form usage, ensuring compliance with HUD guidance.

14-I.B. Detecting Errors and Program Abuse

Addition: The 2024 document adds SEMAP (Section 8 Management Assessment Program) requirements for annual quality control reviews and HQS inspections. Also includes a policy on using independent audits and HUD monitoring reports to identify potential program abuses.

Modification Summary: Expanded detection protocols with defined quality control and audit requirements, reinforcing program accountability.

14-I.C. Investigating Errors and Program Abuse

Addition: New provisions in 2024 require HAKC staff to review all referrals and allegations, specifying that any tip must contain at least one independently verifiable piece of information for investigation. The procedures now include verifying income discrepancy reports through EIV, contacting employers, reviewing public records, and using credit bureau inquiries when necessary.

Modification Summary: Standardized investigation protocols, detailing the steps and criteria to launch investigations, enhancing clarity and consistency in handling program abuse.

14-II.A. Corrective Measures and Penalties

Modification: The 2024 version redefines "corrective measures" by specifying that errors and program abuses must be corrected prospectively. It outlines consideration criteria for assessing penalties, including the severity of the offense, family involvement, and mitigating circumstances.

Modification Summary: Established a structured approach to applying corrective measures based on case severity, which increases fairness and transparency in enforcing penalties.

14-II.B. Family-Caused Errors and Program Abuse

Addition: The 2024 version adds prohibited actions for families, such as knowingly making false statements, committing fraud, bribery, or corrupt acts in connection with

federal housing programs. It lists specific examples, such as misreporting income or offering bribes, to clarify prohibited actions.

Modification Summary: Expanded on prohibited actions, giving clearer guidance on what constitutes family-caused program abuse and outlining penalties for violations.

14-II.C. Owner-Caused Errors and Program Abuse

Addition: The 2024 document expands on specific owner violations, including charging families for services provided to unassisted tenants for free, knowingly accepting incorrect or excess payments, and residing in units with assisted families. It also establishes penalties for non-compliance, such as repayment of excess subsidies and potential disqualification from HAKC programs.

Modification Summary: Enhanced clarity on owner responsibilities and consequences for violations, improving owner compliance and enforcement measures.

14-II.D. HAKC-Caused Errors or Program Abuse

Addition: The 2024 version includes specific prohibited activities for HAKC staff, such as seeking or accepting anything of value from program participants or contractors and disclosing confidential information. The policy also outlines corrective actions for errors caused by staff, including the obligation to reimburse underpaid assistance to families.

Modification Summary: Ensures HAKC staff accountability with specific examples of prohibited actions and establishes corrective protocols for staff-caused errors.

14-II.E. Criminal Prosecution

Addition: Clarifies that HAKC will refer cases to local or federal authorities when program abuse reaches specified thresholds. The 2024 document also specifies that cases exceeding federal limits will be referred to the HUD Office of Inspector General.

Modification Summary: Provides a clear threshold for criminal referrals, formalizing HAKC's stance on prosecuting severe cases of program abuse.

14-II.F. Fraud and Program Abuse Recoveries

Addition: The 2024 version specifies that HAKC may retain a portion of fraud recoveries, detailing the allowed recovery amounts per 24 CFR 982.163.

Modification Summary: Allows HAKC to retain recovery funds from program abuse cases, creating an incentive for thorough fraud detection and correction.

Summary of Modifications

The 2024 updates enhance program integrity measures by:

Strengthening Detection and Investigation Protocols: Adds structured protocols for error and abuse detection, including EIV requirements and investigative procedures.

Detailed Corrective Measures: Establishes criteria-based corrective actions to ensure fair and consistent application of penalties.

Clarified Prohibited Actions: Expands lists of prohibited actions for families, owners, and HAKC staff, making accountability and enforcement clear.

Recovery of Fraud Losses: Provides a mechanism for HAKC to recover fraud-related losses, incentivizing diligent program monitoring.

These updates reflect HAKC's commitment to HUD compliance, improved detection and accountability, and stronger protective measures against program abuse.

HCV Admin Plan 2024 Chapter 15 Summary of Changes

Here's a detailed comparison of changes in Chapter 15 of the HAKC Administrative Plan on Special Programs between the 2017 and 2024 versions, specifying where information was added, deleted, or modified within each section, along with a summary for each area.

Introduction

Addition: The 2024 version includes updated language clarifying that HAKC can permit special housing types as reasonable accommodations for individuals with disabilities, while emphasizing HUD's new guidance on these housing types. The introduction also specifies that single units cannot be designated as more than one special housing type.

Deletion: The 2017 document did not address the limitation on unit designation or the newer HUD guidance.

Modification Summary: Expanded to include recent HUD guidelines and restrictions on unit designation, reinforcing policy compliance for special accommodations.

15-I. Single Room Occupancy (SRO)

Addition: The 2024 document specifies that the HAP contract form (HUD-52641) must indicate SRO as a special housing type in Part A. Additionally, it outlines the HUD requirement that any SRO units must adhere to local fire and safety codes with detailed exit access.

Modification Summary: Enhanced compliance with HUD's form requirements and safety standards for SRO units.

15-II. Congregate Housing

Addition: The 2024 version introduces HUD's new guidance allowing congregate housing, detailing necessary private living areas and central kitchen and dining facilities. It also specifies that food services must be provided, with HAP contracts following HUD-52641 form requirements.

Modification Summary: Updated to align with HUD's latest standards for congregate housing, adding clarity on required facilities and form compliance.

15-III. Group Home

Addition: The 2024 policy adds that group homes are now permitted, with specific HQS requirements including designated bedrooms and community spaces. Each unit must adhere to specified criteria, such as the limit of four residents per bathroom.

Modification Summary: Expanded to permit group homes and provide clear guidance on HQS standards and acceptable configurations for compliance (.

15-IV. Shared Housing

Addition: New language in 2024 emphasizes that shared housing can be a solution in high-cost rental markets, allowing assisted families to share units. The section also specifies compliance with HQS requirements and addresses local occupancy limits and fair housing concerns.

Modification Summary: Enhanced flexibility for shared housing, with guidance on legal barriers and fair housing alignment.

15-V. Cooperative Housing

Addition: The 2024 version permits cooperative housing, detailing requirements such as payment of a carrying charge instead of rent, based on each member's share of cooperative expenses. It outlines HQS compliance measures specific to cooperative housing units.

Modification Summary: Allows for cooperative housing participation with detailed requirements, aligning with HUD guidelines on carrying charges and HQS compliance.

15-VI. Manufactured Homes

Addition: The updated section allows manufactured homes in the HCV program, describing eligibility for renting a manufactured home or space, as well as purchasing one under the HCV Homeownership program. It includes specific utility allowance guidelines and rent reasonableness requirements for manufactured home spaces.

Modification Summary: Updated to permit manufactured homes with clear policies on rent and utility allowances, increasing housing flexibility for participants.

15-VII. Homeownership

Addition: The 2024 document adds a section dedicated to homeownership, with requirements for participants to complete a homeownership counseling program and comply with HUD's eligibility standards for purchasing homes through the HCV program.

Modification Summary: Expands options for families by allowing homeownership, providing guidelines to support compliance and participant readiness.

Summary of Modifications

The 2024 updates to Chapter 15 enhance the flexibility and breadth of housing options within the HCV program:

Increased Permissibility for Special Housing Types: Policies now allow for previously restricted housing types (e.g., group homes, shared housing, cooperative housing, and manufactured homes).

Enhanced Compliance with HUD Guidelines: Sections include detailed requirements on HQS, safety standards, and housing contracts, aligning with current HUD regulations.

Expanded Accessibility: New policies support special housing types as reasonable accommodations, improving access for individuals with disabilities.

Homeownership Program Addition: The inclusion of a homeownership section offers eligible families the opportunity to purchase homes, broadening the program's scope.

These updates improve HAKC's alignment with HUD policies, increase housing options for participants, and provide clear guidelines for compliance across special housing types.

HCV Admin Plan 2024 Chapter 16 Summary of Changes

Here's a detailed summary of the changes between the 2017 and 2024 versions of Chapter 16 of the HAKC Administrative Plan on Program Administration. This analysis shows the specific sections with information added, deleted, or modified, along with a summary for each section.

Introduction

Addition: The 2024 document adds "Part IX: Violence Against Women Act (VAWA): Notification, Documentation, Confidentiality," detailing requirements for notifying families and owners about rights under VAWA.

Modification Summary: Expands the framework to support VAWA compliance, adding specific procedural guidance on victim rights and confidentiality.

Part I: Administrative Fee Reserve

Modification: The 2024 version updates terminology from "Administrative Fee Reserve" to "Unrestricted Net Position (UNP)" and allows for specific uses such as security deposit assistance and landlord incentive payments, following Notice PIH 2022-18.

Deletion: The previous restrictions on administrative fee reserves for post-2003 funds have been streamlined, allowing more flexibility under HUD guidance.

Modification Summary: Broadened UNP usage to support housing voucher leasing strategies and incentivize landlords, increasing adaptability within funding limits.

Part II: Setting Program Standards and Schedules

Addition: Includes guidance on establishing and updating a passbook rate for imputed income calculations, which was not detailed in 2017.

Modification Summary: Strengthens accuracy in setting program standards by formalizing the passbook rate usage.

16-II.B. Payment Standards

Addition: The 2024 document allows for the adoption of exception payment standards in specific zip code areas up to 120% of the Small Area Fair Market Rent (SAFMR), requiring HAKC to notify HUD.

Deletion: Previous exception payment standards did not include the SAFMR-based adjustment criteria.

Modification Summary: Provides flexibility in high-cost areas, supporting rent affordability for tenants in varying housing markets.

16-II.C. Utility Allowances

Modification: The updated version includes more detailed policies on air conditioning utility allowances, allowing exceptions as reasonable accommodations.

Summary: Enhances clarity for tenants needing special accommodations, ensuring equitable support for all eligible utility allowances.

Part IV: Owner or Family Debts to the HAKC

Addition: New language in 2024 specifies actions to recover overpayments from landlords and families, including installment plans and specific penalties for non-compliance.

Modification Summary: Strengthens debt recovery protocols, emphasizing accountability for misused or misallocated funds.

Part V: Section 8 Management Assessment Program (SEMAP)

Addition: The 2024 version mandates enhanced quality control and performance tracking measures aligned with SEMAP, improving program administration through HUD's assessment system.

Modification Summary: Reinforces oversight and quality standards, increasing program transparency and accountability to HUD.

Part VII: Reporting for Children with Elevated Blood Lead Levels

Modification: The 2024 plan now uses "Elevated Blood Lead Level" instead of "Environmental Intervention Blood Lead Level," aligning terminology with current HUD standards.

Summary: Updates terminology to reflect HUD's latest guidelines for environmental health and safety reporting.

Part VIII: Determination of Insufficient Funding

Addition: Specifies that the HAKC must notify HUD before terminating HAP contracts due to insufficient funding and includes requirements for examining all alternative funding options to maintain assistance.

Modification Summary: Strengthens protections for tenants during funding shortages, ensuring comprehensive measures before terminating assistance.

Summary of Modifications

The 2024 updates to Chapter 16 enhance HAKC's administrative framework by:

Expanded Funding and Flexibility: Allows broader use of UNP funds, including specific incentives for landlords, which supports tenant leasing.

Improved Reporting and Compliance: Adds rigorous reporting requirements under SEMAP and updated guidance on blood lead level monitoring.

Enhanced Tenant Protections: Includes new VAWA compliance policies and safeguards for funding shortages, bolstering tenant rights and safety.

These modifications align HAKC's policies with updated HUD guidelines, enhancing program integrity, flexibility, and tenant protections.

HCV Admin Plan 2024 Chapter 17 Summary of Changes

Here is a detailed comparison of changes between the 2017 and 2024 versions of HAKC Chapter 17 PBV Vouchers, highlighting where information was added, deleted, or modified within each section, along with a summary of modifications.

Introduction

Added:

Structured into nine parts: General Requirements, PBV Owner Proposals, Dwelling Units, Rehabilitated and Newly Constructed Units, Housing Assistance Payments Contract, Selection of PBV Program Participants, Occupancy, Determining Rent to Owner, and Payments to Owner.

Page Reference: Page 1.

Deleted:

Original version lacked the segmented breakdown, only provided a general overview.

Modification Summary: Provides a detailed outline of the document's structure, improving organization and clarity for readers on the PBV program components.

General Requirements

Added:

Specific usage limits on project-based assistance (20% of authorized units), and allowance for an additional 10% under certain conditions, such as housing for homeless families or veterans, and units in low-poverty areas.

Page Reference: Page 3.

Deleted:

The previous document provided general PBV limits without the 10% exception details.

Modification Summary: Adds specific project-based limitations and exceptions, ensuring compliance with recent HUD regulations.

Tenant-Based vs. Project-Based Voucher Assistance

Added:

Clarifies tenant-based provisions that do not apply to PBV, including portability, special housing types, and homeownership options.

Page Reference: Page 4.

Deleted:

General information on tenant-based assistance, without details on non-applicable provisions for PBV.

Modification Summary: Enhances policy clarity by outlining tenant-based provisions inapplicable to PBV, assisting in distinguishing program rules.

Definitions Section

Added:

Expanded definitions for terms like “Comparable Rental Assistance,” “Contract Units,” “Development,” and “Excepted Units.”

Page Reference: Pages 5-6.

Deleted:

Limited definitions without explanations for newer terms.

Modification Summary: The updated definitions section provides clearer guidance on terminology, aligning with HUD standards for consistency and reducing ambiguities.

Federal Requirements

Added:

Federal compliance mandates, including labor standards, lead-based paint, civil penalties, debarment, and nondiscrimination under fair housing.

Page Reference: Page.

Deleted:

Minimal references to federal requirements without specifics.

Modification Summary: Expands the federal requirements section, enforcing compliance with labor and safety laws while strengthening non-discrimination policies.

Budget Authority & PBV Assistance

Added:

Requirements for budget tracking and submitting budget authority to HUD, specifying project-basing limits within available resources.

Page Reference: Page 7.

Deleted:

Broad overview of budget limits, lacking details on HUD submission.

Modification Summary: Provides procedural clarity on budget authority calculations and submission requirements, enhancing fiscal accountability.

Relocation Assistance

Added:

Specifies funding sources for relocation under the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA).

Page Reference: Page 8.

Deleted:

General relocation guidance without funding source specifics.

Modification Summary: Details funding mechanisms for relocation, improving procedural clarity and compliance with the URA.

Owner Proposal Selection Procedures

Added:

Process for non-competitive selections of HAKC-owned properties and requirements for HUD-approved independent entity reviews.

Page Reference: Page 10.

Deleted:

Limited guidance on selection criteria and independent review processes.

Modification Summary: Provides a structured selection process for HAKC-owned units, ensuring transparency and adherence to HUD's independent review standards.

Eligible Housing Types

Added:

Prohibited housing types, including units in institutions, nursing homes, or those designated for student occupancy.

Page Reference: Page 12.

Deleted:

General eligibility criteria without specific prohibited types.

Modification Summary: Lists housing types ineligible for PBV assistance, aligning with HUD guidelines to prevent selection of restricted unit types.

Supportive Services for Excepted Units

Added:

Enhanced list of supportive services for units exempt from PBV caps, including job readiness, health, and childcare services.

Page Reference: Page 13.

Deleted:

Limited supportive service guidance without funding or service maintenance requirements.

Modification Summary: Reinforces supportive service requirements to ensure sustained assistance for occupants, aligning with HUD's service standards.

Environmental Review Requirements

Added:

Expanded environmental compliance requirements before HAP contract execution.

Page Reference: Page 14.

Deleted:

Minimal guidance on environmental standards.

Modification Summary: Strengthens environmental review requirements, ensuring PBV projects meet HUD's safety and regulatory standards.

These updates enhance the HAKC's PBV program's regulatory compliance, clarify operational procedures, and provide specific instructions for various program aspects, benefiting stakeholders and maintaining alignment with HUD's latest policies.