



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

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ACOP 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).

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, adds layered criminal screening standards, and introduces local preferences (e.g., for survivors of domestic violence and homelessness).

HOTMA Relevance: Aligns eligibility verification and documentation processes per PIH 2023-27.

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.

HOTMA Relevance: Supports timely application processing and eligibility determination enhancements.

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.

HOTMA Relevance: Indirect impact through expanded household definitions.

Chapter 6 – Income & TTP

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 exclusions.

HOTMA Relevance: Major revisions reflect HOTMA mandates on income determination and rent structure.

Chapter 7 – Verification

2018 Policy: Relied primarily on third-party documentation.

2025 Draft: Follows HUD's verification hierarchy with EIV usage, self-certification protocols, and safeguards for tenants.

HOTMA Relevance: Verification tiers realigned per HOTMA guidance.

Chapter 8 – Leasing

2018 Policy: Provided basic leasing procedures.

2025 Draft: Details lease execution, HUD addenda, and onboarding requirements.

HOTMA Relevance: Ensures lease documents align with new HOTMA eligibility timing.

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.

HOTMA Relevance: Adjusts timing of reexaminations for fixed-income and other households.

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.

HOTMA Relevance: Not applicable.

Chapters 11–22 – Other Key Chapters

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 EIV fraud detection.

HOTMA Relevance: Applies to reexams, over-income notices, and administrative streamlining (esp. Ch. 13, 14, 15, and 16).

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 and electronic notices.
- Expands language on the rights of individuals with disabilities and those requiring accommodations.
- Includes stronger language on retaliation protections for residents using grievance rights.

HOTMA Relevance: While HOTMA doesn't directly change grievance procedures, new administrative processes under HOTMA (like over-income terminations) are included under grievance rights for appeal.

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 to one active repayment agreement at a time.
- Includes HUD's requirement that over-income families may no longer be eligible for continued assistance beyond the grace period.

HOTMA Relevance: Aligns with HOTMA's over-income enforcement policies and timing of termination notices.

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.

HOTMA Relevance: Indirect—requires more frequent reexaminations and administrative streamlining, which complements enhanced CSSR monitoring.

Chapter 16 – Program Integrity

2018 Policy: General reference to fraud prevention and HUD EIV use.

2025 Draft: Formalizes fraud detection protocols using the HUD EIV system.

- Specifies investigation procedures and thresholds for referral to law enforcement.
- Adds detailed tenant file review standards and includes random audits.
- Addresses misuse of income reporting and occupancy fraud.

HOTMA Relevance: Reinforces HOTMA's emphasis on accurate reporting, income integrity, and consequences for non-disclosure.