

HAKC Proposed Summary of Changes

HAKC has updated the format and organization of the Administrative plan for clarity and increased ease of navigation. In addition to the changes, HAKC has adopted the Nan McKay version and revised the Plan's language to reflect updates to HAKC's policies as well as new or revised regulatory requirements. The chart below summarizes and details these changes.

Sub-Section	Current Policy Summary	Proposed Policy Summary	Change Type / Summary	Policy Citation(s) CFR/HUD Notice/if applicable
1-I.B Organization	General jurisdiction defined by bylaws.	Explicit counties and cooperating PHAs named.	Clarification / expanded specificity	
1-I.C Mission	Mission focused on housing, deconcentration, self-sufficiency.	Mission rewritten to include organizational values and staff development.	Mission statement updated	
1-III.D Updating the Plan	Plan reviewed at least annually.	Plan reviewed as needed.	Will update plan as often as needed, not just annually	
2-I.A Nondiscrimination Overview	Civil rights statutes listed; VAWA 2013 referenced.	Updated references including VAWA 2023 guidance.	Regulatory update	24 CFR 5.2005 (VAWA protections); VAWA applicability guidance (HUD, Jan. 4, 2023)
2-I.B Nondiscrimination Overview	Does not expand protected classes language and clarify nondiscrimination applies to applicants, participants, owners, and partners.	Expands protected classes language and clarifies nondiscrimination applies to applicants, participants, owners, and partners.	Expanded protected classes language.	
2-I.C Accommodation Requests	Accommodation requests allowed; limited process detail.	Accommodation language and staff contact required on notices.	New procedural requirement	24 CFR 5.2005 (VAWA protections); VAWA applicability guidance (HUD, Jan. 4, 2023)
3-V.A Asset Limitation	No asset cap for eligibility.	HUD/HOTMA asset limitation adopted.	New eligibility policy (HOTMA)	24 CFR 5.618 (restriction on assistance based on assets) & 24 CFR 5.603 (net family assets definition); HOTMA Voucher Final Rule (89 FR 38224, May 7, 2024); PIH Notice 2024-19
3-V.B Asset Self-Certification	Full asset verification required.	Self-certification allowed below HUD threshold.	New policy (HOTMA)	HOTMA Voucher Final Rule (89 FR 38224, May 7, 2024); PIH Notice 2024-19
4-III.B Targeted Funding	Special purpose vouchers referenced generally.	Explicit list of targeted voucher programs including EHV.	Policy expansion / clarification	PIH Notice 2021-15 (EHV Operating Requirements); PIH Notice 2025-19 (transitioning EHV families into HCV); PIH Notice 2021-20 (EHV reporting requirements)
4-III.C Emergency Housing Vouchers	Not applicable.	EHV local preference added	New policy	
5-I.B Briefings	In-person briefings standard.	Virtual/remote briefings explicitly permitted.	Procedural clarification	
5-I.C Voucher Extensions	Extensions allowed for good cause.	Expanded examples including disability-related needs.	Clarification	
6 Structural Framework	Single income determination framework.	Split into Legacy (6-A) and HOTMA (6-B) rules.	Major structural and policy change	HOTMA Voucher Final Rule (89 FR 38224, May 7, 2024); PIH Notice 2024-19
6-B.II Assets	No asset eligibility limit.	Asset limitation enforced.	Major HOTMA policy change	HOTMA Voucher Final Rule (89 FR 38224, May 7, 2024); PIH Notice 2024-19
6-B.IV Student Financial Assistance	Most student aid counted as income.	Expanded exclusions under HOTMA.	Major HOTMA policy change	HOTMA Voucher Final Rule (89 FR 38224, May 7, 2024); PIH Notice 2024-19
7-B.I Verification Hierarchy	Third-party verification emphasized.	HOTMA verification hierarchy adopted.	Major HOTMA policy change	HOTMA Voucher Final Rule (89 FR 38224, May 7, 2024); PIH Notice 2024-19
7-B.VII HUD-9886-A	Signed at every annual recertification.	HOTMA change: HUD-9886-A signed once; for members turning 18 between annual recerts, notify in writing and have them sign at next annual or interim, whichever is earlier.	Major policy change	24 CFR 5.230 (consent by assistance applicants/participants); PIH Notice 2023-27 (HOTMA sections 102/104 implementation); HOTMA Voucher Final Rule (89 FR 38224)
8-I.A Smoke Detectors	Owner responsible for repairs.	Family must repair if intentionally disconnected (24 hrs).	Responsibility clarified	24 CFR 5.703 (NSPIRE national standards) and related NSPIRE guidance (PIH Notice 2023-16); HCV HQS at 24 CFR 982.401
8-II.F Reinspections	Reinspection within 25–30 days.	Reinspection immediately after correction period.	Process change	24 CFR 5.703 (NSPIRE national standards) and related NSPIRE guidance (PIH Notice 2023-16); HCV HQS at 24 CFR 982.401
8-II.G HAP Abatement Duration	Maximum abatement 90 days.	60-day max for newer HAP contracts.	Policy modified	24 CFR 5.703 (NSPIRE national standards) and related NSPIRE guidance (PIH Notice 2023-16); HCV HQS at 24 CFR 982.401

10-I.D Notice to Vacate 10-II.D. Absorptions vs. Billing	Written notice required PHA discretion	Electronic notice explicitly allowed Clarifies that decision may be based on funding availability and administrative considerations	Procedural clarification Clarification only	24 CFR 982.314 (family moves) & 24 CFR 982.355 (portability) HOTMA Voucher Final Rule (89 FR 38224, May 7, 2024); PIH Notice 2024-19 (effective & compliance dates)
10-III.A. Portability and Special Purpose vouchers	Limited references	Cross-referenced to Chapter 19 for EHV, FUP, VASH portability rules	Structural clarification Major HOTMA policy change--Streamlined income review for fixed-income households	HOTMA Voucher Final Rule (89 FR 38224, May 7, 2024); PIH Notice 2024-19 (effective & compliance dates)
11-B Interim Reexams	Interims processed broadly	HOTMA restricts interim increases; mandatory interims added	Reduced verification frequency in some cases	24 CFR 5.703 (NSPIRE national standards) and related NSPIRE guidance (PIH Notice 2023-16); HCV HQS at 24 CFR 982.401
11-B Effective Dates	Limited retro guidance	Explicit repayment & owner notice rules	New procedural policy	24 CFR 5.703 (NSPIRE national standards) and related NSPIRE guidance (PIH Notice 2023-16); HCV HQS at 24 CFR 982.401
11-B.I.B. Fixed Income Households	No special treatment	HOTMA restricts when interim increases are processed	HOTMA changes	24 CFR 982.633 (homeownership option); automatic termination after 180 days and PHA hardship relief discretion)
11-B.II.B. Interim decreases in Income	Interim decrease processed	Same, but HOTMA adds hardship-based triggers and timelines	HOTMA changes	
11-I.C. SCHEDULING ANNUAL REEXAMINATIONS	Annual certification will remain the same from first move in		Policy Change	24 CFR 982.555 (informal hearing requirements, including access to documents/evidence)
12-II.C VAWA Protections	VAWA 2013 referenced	Updated VAWA 2022/2023 guidance	Compliance update	24 CFR part 982, subpart M (special housing types)
All sections	Owner rules stable	Clarified enforcement & NSPIRE cross-references	No policy change	24 CFR 5.703 (NSPIRE national standards) and related NSPIRE guidance (PIH Notice 2023-16); HCV HQS at 24 CFR 982.401
All sections	PBV policies	PBV policies retained; NSPIRE references added	Clarification only	PIH Notice 2021-15 (EHV Operating Requirements); PIH Notice 2025-19 (transitioning EHV families into HCV); PIH Notice 2021-20 (EHV reporting requirements)
15-VII.N Termination Relief	Automatic termination after 180 days	Hardship-based extension up to 90 days added	New discretionary policy	24 CFR 5.703 (NSPIRE national standards) and related NSPIRE guidance (PIH Notice 2023-16); PIH Notice 2021-15 (EHV Operating Requirements); PIH Notice 2025-19 (transitioning EHV families into HCV); PIH Notice 2021-20 (EHV reporting requirements)
18-III 19-III.B	HQS-based abatements NO FUP transfer rules	NSPIRE-aligned timelines & notices Transfer to regular HCV + no youth preference	Clarification New policy	
19. Special Purpose Vouchers	Not applicable	EHV program and transition policies added	New program policy	