

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.

PART VII. HCV Home Ownership

Overview 24CFR 982.625

Addition:

HAKC has instituted a minimum homeowner down payment requirement of at least one percent of the purchase price and requires the funds come from the family's personal resources such as:

- An individual development account
- A Family Self-Sufficiency (FSS) escrow account
- One time gift contribution from a family member

There are two forms of Housing Choice Voucher assistance described in the regulations: monthly homeownership assistance payments and single down payment assistance grants. HAKC has selected the homeownership option which allows for monthly homeownership assistance payments.

Deletion:

In the previous plan under participant eligibility, Federal Eligibility Requirements 24 CFR 982.627,625, b. states that "The family must currently be enrolled in the Family Self-Sufficiency Program (FSS)" and in compliance with the FSS contract; unless the family is elderly or disabled; or willing to enroll in the FSS program and enter an FSS contract as a condition of acceptance into the HCV Home Ownership Program; or have already graduated from the FSS Program.

The participant no longer has to be a graduate of the FSS program.

Also under Participant Eligibility, Federal Eligibility Requirements 24 CFR 982.627,625

d., bullet point 4, A family member will be considered to have been permanently employed even if that family member has experienced a break in employment, provided that the break in employment has been the only break in employment within the previous 12 calendar months and the break in employment was no longer than 4 weeks without good cause.

Modification:

In the previous plan under Local Eligibility Requirements, b. Except for the elderly and disabled, the family must have a minimum savings of \$1,500. This has changed and the following addition was made.

Addition:

Section B, Eligibility Requirements:

3 Bullet points were added to the eligibility requirements:

- A family must have at least \$2000 minimum savings. This savings can come from IDAs, income tax refunds, gifts from family or friends, income savings or inheritance. The savings may not be established through the borrowing of funds through installment or revolving loans.
- The family must be credit worthy with a credit score of no less than 640

For a disabled or elderly families, who will own the home must have an annual income that is not less than the monthly federal Supplemental Security Income (SSI) benefit for an individual living alone multiplied by 12 months (for example in 2025, the federal Supplemental Security Income is \$967 multiplied by 12. The annual income is \$11,604)

Addition:

Section C Enrollment:

The HAKC will consider the participant enrolled in the Home Ownership Program once the applicant/family has completed the following steps

1. Submit a complete application for assistance (including required documentation)
2. Submit a copy of the certificate received upon completion of an approved homebuyer education class
3. Met the HAKC eligibility requirements as outlined in the policy
4. Receive a mortgage loan pre-approval letter

Modification:

E. Eligible Units, bullet point 5 points out that

- Unit meets HUD housing quality standards (NSPIRE standards effective October 2025)
This bullet point includes the new HUD NSPIRE regulations

Modification:

F. Search and Purchase Requirements

HAKC has established the maximum time that will be allowed for a family to relocate and purchase a home. The family's deadline date for locating a home to purchase will be 180 calendar days form the date the family's eligibility for the HCV Homeownership assistance is determined. For good cause HAKC may extend an HCV family's time to locate a home for additional (30) day increments for 2 increments.

This is a modification from the previous plan that states, under G. Search and Purchase Requirements: HAKC has established a maximum time that will be allowed for a family to locate and purchase a home. The family's deadline date for locating a home will be 120 calendar days from the date the family's eligibility for the HCV Homeownership assistance is determined. For good cause HAKC may extend a HCV family's time to locate the home for additional (30) day increments for two increments.

Modification:

Section G. Inspections:

The unit must meet Housing Quality Standards or NSPIRE standards (as of October 2025).

This includes the HUD NSPIRE regulations.

Addition:

Section G. Inspections:

The HAKC must review the independent inspector's report and make recommendation on whether to proceed with the sale based upon its review.

Addition:

Section G., Inspections

A contingency clause in the sales agreement must provide that the buyer is not obligated to pay for necessary repairs

Addition:

H. Contract of Sale

J. Financing:

Either the lender or Participants are required to submit a copy of their loan application also known as the Uniform Residential Loan (URLA) Fannie Mae Form 1003, to HAKC for review.

If the mortgage isn't funded by Fannie Mae, Freddie Mac, FHA-insured, or VA-guaranteed, the HAKC may require the lender to follow general accepted mortgage underwriting standards, consistent with those of HUD/FHA, Fannie Mae, Freddie Mac, USDA/RHS and the Federal Home Loan Bank.

HAKC will review seller financing arrangements on a case-by-case basis to ensure they meet program's affordability and compliance standards.

Modification:

H. Contract of Sale 24 CFR 982.631

Financing;

1. The Head-of-Household will deposit his/her portion of the monthly mortgage payment (i.e., scheduled mortgage payment plus the Section 8 Homeownership Assistance Payment) into the account by the tenth (10th) calendar day of each month.

This is modified from the previous plan that stated the Head of Household will deposit his/her portion of the monthly mortgage payment (i.e. scheduled mortgage payment plus the Section 8 Homeownership Assistance Payment) into the account by the (3rd) calendar day of each month.

2. The Lender to initiate electronic withdrawals from the account for payment of the monthly mortgage payment due Lender. The Lender will automatically withdraw the full mortgage payment amount on the eleventh (11th) calendar day of each month.

Modified from the previous plan that stated, the lender to initiate electronic withdrawals from the account for payment of the monthly mortgage payment due lender. The lender will automatically withdraw the full mortgage payment amount on the (6) calendar day of each month.

Modification:

H. Contract of Sale 24 CFR 982.631

Financing;

The HAKC will review the affordability of the family's proposed loan terms to ensure they are reasonable given current market conditions and the family's overall financial situation. In making this determination, the HAKC may consider additional household expenses such as childcare, unreimbursed medical cost, and educational or training expenses. The total monthly housing expenses should not exceed 35% of the combined gross monthly income of all adult household members (front-end ratio), and total monthly debt obligations, including housing and all other debts should not exceed 40 percent of gross monthly income (back-end ratio).

Modified from previous plan that stated the total monthly housing expenses should not exceed 38% of the combined gross monthly income of all adult household members

Addition:

P. Portability 24CFR 982.636, 982.353(b) and (c), 982.552, 982.553

A current HCV Program family who qualifies for homeownership assistance may port to another jurisdiction and purchase a home outside the HAKC's jurisdiction through another agency's program, provided the receiving PHA is administering a homeownership program, is accepting new families into its program, and considers the family eligible based upon the receiving PHA's eligibility requirements. Participants porting to other jurisdictions do not qualify for Homeownership Program Assistance from the HAKC.

Modification:

The current policy emphasizes that participants porting to other jurisdictions do not qualify for Home Ownership Program assistance from the HAKC

Addition:

Section T., Death of a Homeowner

If the family member(s) who holds the title to the home or ownership of cooperative membership shares for the home dies, HAKC may continue making homeownership assistance payments on behalf of the remaining household members until the estate is settled. If payments were previously made directly to the now deceased family member they should be sent to the decedent's executor or legal representative. Payments can only continue as long as the unit is solely occupied by remaining family member.

Modification:

Section U., Policy Review and Updates

The Housing Authority of Kansas City, MO (HAKC) is committed to maintaining a Homeownership Program policy that reflects current federal regulations, industry standards, and the needs of participating families. This section outlines the process for reviewing, updating and approving the changes to the policy.

The Homeownership Program Policy shall be reviewed annual basis by the HAKC Homeownership Department in collaboration with relevant departments, including Finance, Legal, and the Housing Choice Voucher Program, as applicable.

- Review Timeline – the review process will coincide with the drafting of the Agency Annual Plan
- Scope of Review – the review will assess regulatory compliance, program effectiveness, clarity and operational feasibility.

All substantive policy revisions shall be submitted to the HAKC Executive Office for approval. Where applicable, updates may also require review and authorization by the Board of Commissioners.

- Minor revisions – may be approved administratively (i.e. formatting, clarification of language, non-substantive changes)
- Major revisions – must be documented and formally adopted (i.e. eligibility changes, financing terms, incentives, etc.)

The previous policy stated that there would be an HCV Home Ownership Advisory Committee formed by the HAKC. The current policy provides clarity on which entities will review the policy and the specific time frame for the reviewing process.