PHA ADMINISTRATIVE PLAN POLICY CHANGES

OLD **2-III.B. ORAL INTERPRETATION**

The PHA will offer competent interpretation services free of charge, upon request, to the LEP person.

PHA Policy

The PHA will utilize a language line for telephone interpreter services.

When exercising the option to conduct remote briefings, informal reviews, or hearings, however, the PHA will coordinate with a remote interpretation service which, when available, uses video conferencing technology rather than voice-only interpretation.

Where LEP persons desire, they will be permitted to use, at their own expense, an interpreter of their own choosing, in place of or as a supplement to the free language services offered by the PHA. The PHA, at its discretion, may choose to use the language services even when LEP persons desire to use an interpreter of their choosing. The interpreter may be a family member or friend. If the interpreter chosen by the family is a minor, the PHA will not rely on the minor to serve as the interpreter.

The PHA will analyze the various kinds of contacts it has with the public, to assess language needs and decide what reasonable steps should be taken. “Reasonable steps” may not be reasonable where the costs imposed substantially exceed the benefits.

Where feasible and possible, the PHA will train and hire bilingual staff to be available to act as interpreters and translators, will pool resources with other PHAs, and will standardize documents.

NEW **2-III.B. OVERVIEW [OAG Memo 7/14/25 and Executive Order 14224]**

In March 2025, Executive Order 14224 revoked Executive Order 13166, which had directed agencies to enhance access to federal programs for persons with limited English proficiency (LEP) and required tailored guidance for recipients of federal funding under Title VI of the Civil Rights Act of 1964. Executive Order 14224 also declared English as the official language of the United States.

In response, on July 14, 2025, the Office of the Attorney General (OAG) issued a memo on the implementation of EO 14224, which rescinded all prior guidance to federal agencies regarding Title VI of the Civil Right Act’s prohibition against national origin discrimination affecting LEP persons. The memo presents a legal analysis that finds language is not an immutable characteristic entitled to Title VI protection and decoupling LEP persons from national origin discrimination. The memo states that, where allowed by law, agencies should determine which of their programs and policies might serve the public at large better if operated exclusively in English. The OAG memo also states that agencies are not required to amend, remove, or otherwise stop production of all multilingual documents, products, or other services prepared or offered. Further, many states and localities have laws regarding language services to be provided to non-English-speaking persons that may apply to the PHA.

Language for Limited English Proficiency Persons (LEP) can be a barrier to accessing important benefits or services, understanding and exercising important rights, complying with applicable responsibilities, or understanding other information provided by the HCV program.

PHA Policy

PHA oral and written communications with families will generally be conducted in English. For applicants and participants who may require language assistance, the PHA will encourage families to bring an advocate, family member, friend, or other adult representative to assist in communications. The PHA will also utilize available resources such as bilingual staff, community volunteer resources, responsible use of artificial intelligence technology, and/or machine translation to assist families with communication.

OLD **4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204]**

PHA Policy

The waiting list will be updated as needed to ensure that all applicants and applicant information is current and timely.

To update the waiting list, the PHA will send an update request via first class mail or encrypted electronic communication to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address or email that the PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.

The family's required response may be submitted using encrypted electronic communication, in-person, by mail, by email, or by fax. Responses should be postmarked no later than the due date indicated on the waiting list status update form.

If the family fails to provide their response by the due date indicated on the status update form, the family will be removed from the waiting list without further notice.

If the notice is returned by the post office with no forwarding address, the applicant will be removed from the waiting list without further notice.

If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 10 business days to respond from the date the letter was re-sent.

If a family is removed from the waiting list for failure to respond, the Executive Director may reinstate the family, if it is determined that the lack of response was due to PHA error, or to circumstances beyond the family's control, as a result of a family member's disability, or as a direct result of status as a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, including an adverse factor resulting from such abuse.

NEW **4-II.F. UPDATING THE WAITING LIST [24 CFR 982.204]**

PHA Policy

The waiting list will be updated as needed to ensure that all applicants and applicant information is current and timely.

To update the waiting list, the PHA will send an update request via first class mail or encrypted electronic communication to each family on the waiting list to determine whether the family continues to be interested in, and to qualify for, the program. This update request will be sent to the last address or email that the PHA has on record for the family. The update request will provide a deadline by which the family must respond and will state that failure to respond will result in the applicant's name being removed from the waiting list.

The family's required response may be submitted using encrypted electronic communication, in-person, by mail, by email, or by fax. Responses should be postmarked no later than the due date indicated on the waiting list status update form.

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If the notice is returned by the post office with a forwarding address, the notice will be re-sent to the address indicated. The family will have 10 business days to respond from the date the letter was re-sent.

If a family is removed from the waiting list for failure to respond, the Executive Director may reinstate the family, if it is determined that the lack of response was due to PHA error, or to circumstances beyond the family's control, as a result of a family member's disability, or as a direct result of status as a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, including an adverse factor resulting from such abuse.

If a family would like to dispute their removal from the waiting list, an informal review must be requested within 30 days from the date of their removal.

OLD	**6-II.C. Asset Inclusions and Exclusions** ***Necessary and Non-Necessary Personal Property*** PHA Policy In determining the value of personal property held as an investment, the PHA will use the family's estimate of the value. The PHA may obtain an appraisal to confirm the value of the asset if there is reason to believe that the family's estimated value is off by **$50** or more. The family must cooperate with the appraiser but cannot be charged any costs related to the appraisal.
NEW	**6-I.L. Assets** ***Personal Property*** PHA Policy In determining the value of personal property held as an investment, the PHA will use the family's estimate of the value. The PHA may obtain an appraisal to confirm the value of the asset if there is reason to believe that the family's estimated value is off by **$1000** or more. The family must cooperate with the appraiser but cannot be charged any costs related to the appraisal.
OLD	**6-III.A. Introduction** 5.611(a) Mandatory deductions. In determining adjusted income, the responsible entity [PHA] must deduct the following amounts from annual income: (1) **$480** for each dependent; (2) **$400** for any elderly family or disabled family; (3) The sum of the following, to the extent the sum exceeds **three** percent of annual income:
NEW	**6-III.A. Introduction** 5.611 *Adjusted income* means annual income (as determined under § 5.609) of the members of the family residing or intending to reside in the dwelling unit, after making the following deductions: (a) *Mandatory deductions* (1) **$500** for each dependent (adjusted annually by HUD, rounded to the next lowest multiple of $25); (2) **$550** for any elderly family or disabled family (adjusted annually by HUD, rounded to the next lowest multiple of $25); (3) The sum of the following, to the extent the sum exceeds **ten** percent of annual income:
OLD	**None**
NEW	**6-III.G. Hardship Exemptions [24 CFR 5.611(c), (d), and €]** **Health and Medical Care and Disability Assistance Expenses** **Phased-In Relief** Families will begin receiving a 24-month phased-in relief at their next annual or interim reexamination, whichever occurs first, after the date on which the PHA implements phased-in relief. For these families, the threshold amount is phased-in as follows: • The family is eligible for a deduction totaling the sum of expenses that exceeds **5 percent** of annual income for the **first 12 months**. • At the conclusion of 12 months, the family is eligible for a deduction totaling the sum of their expenses that exceed **7.5 percent** of annual income **for another 12 months**. • At the **conclusion of 24 months**, the standard threshold amount of **10 percent would be used**

OLD	**6-IV.B. Overview of Rent and Subsidy Calculations** ***Minimum Rent [24 CFR 5.630]*** PHA Policy The minimum rent for this locality is $0.
NEW	**6-IV.B. Overview of Rent and Subsidy Calculations** ***Minimum Rent [24 CFR 5.630]*** PHA Policy The minimum rent for this locality is **$50**.
OLD	**6-IV.C. Applying Payment Standards [24 CFR 982.505© and Notice PIH 2024-34]** **Changes in Family Unit Size (Voucher Size) [24 CFR 982.5805(c)(6) and Notice PIH 2024-34]** PHA Policy If the family unit size (voucher size) changes during the term of a HAP contract, the new family unit size will be used to determine the payment standard at the family's first regular reexamination following the change in family unit size.
NEW	**6-IV.C. Applying Payment Standards [24 CFR 982.505© and Notice PIH 2024-34]** **Changes in Family Unit Size (Voucher Size) [24 CFR 982.5805(c)(6) and Notice PIH 2024-34]** PHA Policy If the family unit size (voucher size) changes during the term of a HAP contract, the new family unit size will be used to determine the payment standard **at the time of processing the family's interim reexamination to change the family unit size**.
OLD	**7-I.B. Family Consent to Release Information:** No policy
NEW	**7-I.B. Family Consent to Release Information** PHA Policy **At admission, the PHA will request that all adult family members (other than the head of household) sign consent forms stating that their EIV income information may be shared with the head of household. Adult family members with no such consent form on file will be requested to sign at annual reexamination.** **If an adult family member other than the head of household fails to sign a consent form stating that their EIV income information may be shared with the head of household, the PHA will utilize EIV's "Print Household Member Information" feature to generate income reports addressed separately to each adult in the household. For example, if a household has two adults, the PHA will provide one report to the head of household and a separate report to the other adult member.** **Refusal by an adult family member to sign a form granting permission to provide EIV information to the head of household is not grounds for denial or termination of assistance of either the individual or the family.** **The executed form will remain effective until the family is denied assistance, the individual leaves the program, or the family member provides written notification to the PHA to revoke consent.**

OLD

7-I.F. Level 4 Verification [Notice PIH 2023-27]
Written Third-Party Verification from the Source

PHA Policy

In general, the PHA will use third-party verification from the source in the following circumstances:

At annual reexamination when EIV + self-certification is not used;
For all new admissions; and
For all interim reexaminations.

The PHA will not use this method if the PHA is able to use an income determination from a means-tested federal assistance program or if the PHA uses EIV + self-certification as outlined above.

In general, third-party documents provided by the family or the source must be dated within 120 days of the date received by the PHA. However, for fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation.

The PHA may reject documentation provided by the family if the document is not an original, if the document appears to be forged, or if the document is altered, mutilated, or illegible. If the PHA determines that third-party documents provided by the family are not acceptable, the PHA will explain the reason to the family and request additional documentation from the family or will use a lower form of verification such as a written third-party verification form.

When verification of assets held by a banking or financial institution is required, the PHA will obtain one statement that reflects the current balance of the account.

When pay stubs are used, the PHA will require the family to provide the two most current, consecutive pay stubs. At the PHA's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income, fluctuating schedule, etc.), the PHA may request additional paystubs or a payroll record.

NEW

7-I.F. Level 4 Verification [Notice PIH 2023-27]
Written Third-Party Verification from the Source

PHA Policy

In general, the PHA will use third-party verification from the source in the following circumstances:

At annual reexamination when EIV + self-certification is not used;
For all new admissions; and
For all interim reexaminations.

The PHA will not use this method if the PHA is able to use an income determination from a means-tested federal assistance program or if the PHA uses EIV + self-certification as outlined above.

In general, third-party documents provided by the family or the source must be dated within 120 days of the date received by the PHA. However, for fixed-income sources, a statement dated within the appropriate benefit year is acceptable documentation.

The PHA may reject documentation provided by the family if the document is not an original, if the document appears to be forged, or if the document is altered, mutilated, or illegible. If the PHA determines that third-party documents provided by the family are not acceptable, the PHA will explain the reason to the family and request additional documentation from the family or will use a lower form of verification such as a written third-party verification form.

When verification of assets held by a banking or financial institution is required, the PHA will obtain **three most current, consecutive statements that reflects the current balance of the account.**

When pay stubs are used, the PHA will require the family to provide the three most current, consecutive pay stubs. At the PHA's discretion, if additional paystubs are needed due to the family's circumstances (e.g., sporadic income, fluctuating schedule, etc.), the PHA may request additional paystubs, a payroll record, **most recent W-2 provided by employer, or most recent Federal Income Tax forms.**

OLD	**8-II.A. Overview [24 CFR 982.405]** **Inspection Costs [Notice PIH 2016-05 and 24 CRF 5.705(h)]** PHA Policy The PHA will not charge a fee for failed reinspections.
NEW	**8-II.A. Overview [24 CFR 982.405]** **Inspection Costs [Notice PIH 2016-05 and 24 CRF 5.705(h)]** PHA Policy The PHA will impose a $25.00 reinspection fee to the owner for the first reinspection when: The owner reports that a deficiency has been repaired, but reinspection reveals that the deficiency has not been repaired, The PHA may waive the fee if repairs for non-life-threatening items were delayed due to circumstances beyond the owner's control.
OLD	**10-I.A. Allowable Moves** PHA Policy If the family and the owner mutually agree to terminate the lease for the family's unit, the family must give the PHA a copy of the mutual lease termination agreement.
NEW	**10-I.A. Allowable Moves** PHA Policy If the family and the owner mutually agree to terminate the lease for the family's unit, the family must give the PHA a copy of the mutual lease termination agreement. **If the mutual lease termination agreement indicates a past due balance owed to the owner, the PHA may require the family to enter into a repayment agreement with the owner and issue a copy of the agreement to the PHA.**
OLD	**10-II.B. Initial PHA Role (Portability)** **Voucher Issuance and Term** PHA Policy For participating families approved to move under portability, the PHA will issue a new voucher within 10 business days of the PHA's written approval to move. The initial term of the voucher will be 90 days.
NEW	**10-II.B. Initial PHA Role (Portability)** **Voucher Issuance and Term** PHA Policy For participating families approved to move under portability, who do not currently have an open voucher, a new voucher will be issued within 10 business days of the PHA's approval to move. The initial term of the voucher will be 90 days. For families that currently have an open voucher, and then decide to move under portability, there must be least 31 days remaining on the voucher at the time the portability request is submitted to the PHA. Additionally, port-out cancellation requests will be limited to one during the initial term of the voucher due to the administrative burden put on staff.

OLD **11-II.B. Changes in Family and Household Composition: New Family and Household Members Requiring Approval**

PHA Policy
Families must request PHA approval to add a new family member (other than due to birth, adoption, or court-awarded custody) , live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 30 consecutive days or 90 cumulative days within a 12-month period and therefore no longer qualifies as a “guest.” Requests must be made in writing and approved by the PHA prior to the individual moving into the unit.

The PHA will not approve the addition of a new family or household member unless the individual meets the PHA’s eligibility criteria (see Chapter 3) and documentation requirements (see Chapter 7, Part II).

The PHA will not approve the addition of a foster child or foster adult if it will cause a violation of space standards.

If the PHA determines an individual meets the PHA’s eligibility criteria and documentation requirements, the PHA will provide written approval to the family. If the approval of a new family member or live-in aide will cause overcrowding according to space standards, the approval letter will explain that the family will be issued a voucher and will be required to move.

If the PHA determines that an individual does not meet the PHA’s eligibility criteria or documentation requirements, the PHA will notify the family in writing of its decision to deny approval of the new family or household member and the reasons for the denial.

The PHA will make its determination within 10 business days of receiving all information required to verify the individual’s eligibility.

NEW **11-II.B. Changes in Family and Household Composition: New Family and Household Members Requiring Approval**

PHA Policy
Families must request PHA approval to add a new family member (other than due to birth, adoption, or court-awarded custody), live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 30 consecutive days or 90 cumulative days within a 12-month period and therefore no longer qualifies as a “guest.” Requests must be made in writing and approved by the PHA prior to the individual moving into the unit.

The request to add a new adult family member will be limited to the events of marriage and legal domestic partnership. Additionally, the PHA will not approve the addition of a new family or household member unless the individual meets the PHA’s eligibility criteria (see Chapter 3) and documentation requirements (see Chapter 7, Part II).

The PHA will not approve the addition of a foster child or foster adult if it would result in overcrowding of the existing unit. If the authorized placement agency (e.g., public child welfare agency) requires that the foster child have a separate bedroom, the PHA will provide the subsidy standard for one additional bedroom, in accordance with 5-II.B.

If the PHA determines an individual meets the PHA’s eligibility criteria and documentation requirements, the PHA will provide written approval to the family. If the approval of a new family member or live-in aide will cause overcrowding according to space standards, the approval letter will explain that the family will be issued a voucher and will be required to move.

If the PHA determines that an individual does not meet the PHA’s eligibility criteria or documentation requirements, the PHA will notify the family in writing of its decision to deny approval of the new family or household member and the reasons for the denial.
The PHA will make its determination within 10 business days of receiving all information required to verify the individual’s eligibility.

OLD **11-II.B. Changes in Family and Household Composition: Changes in Family Unit Size [24 CFR 982.505(c)(6)]**

PHA Policy

If the family unit size (voucher size) changes during the term of a HAP contract, the new family unit size will be used to determine the payment standard on the effective date of the next reexamination.

NEW **11-II.B. Changes in Family and Household Composition: Changes in Family Unit Size [24 CFR 982.505(c)(6)]**

PHA Policy

If the family unit size (voucher size) changes during the term of a HAP contract, the new family unit size will be used to determine the payment standard on the effective date of the interim reexamination being processed for the change in family size.

OLD **11-II.C. Changes Affecting Income or Expenses**
Interim Decreases [24 CFR 982.516(c)(2) and Notice PIH 2023-27]

PHA Policy

The PHA will conduct an interim reexamination any time the family's adjusted income has decreased by any amount.

NEW **11-II.C. Changes Affecting Income or Expenses**
Interim Decreases [24 CFR 982.516(c)(2) and Notice PIH 2023-27]

PHA Policy

Generally, the PHA will only conduct an interim when the family's adjusted income has decreased by an amount that is 10 percent or more of the family's adjusted income.

When determining the 10 percent threshold, the PHA will round calculated percentages up or down to the next nearest unit as applicable (e.g., a calculated decrease of 9.5 percent will be rounded to 10 percent).

However, the PHA will perform an interim reexamination for a decrease in adjusted income of any amount in two circumstances:

When there is a decrease in family size attributed to the death of a family member; or

When a family member permanently moves out of the assisted unit during the period since the family's last reexamination.

OLD **11-II.C. Changes Affecting Income or Expenses: Family-Initiated Interim Reexaminations**
Required Reporting

PHA Policy

Families are required to report all increases or decreases in household income within 10 business days of the date the change takes effect.

The PHA will conduct an interim reexamination to recalculate the new family share of rent and new subsidy amount.

NEW **11-II.C. Changes Affecting Income or Expenses**
Increases 10 Percent or Greater

PHA Policy

When a family reports an increase in their earned income between annual reexaminations, the PHA will not conduct an interim reexamination, regardless of the amount of the increase, and regardless of whether there was a previous decrease since the family's last annual reexamination.

The PHA will process an interim reexamination for any increases in unearned income of 10 percent or more in adjusted income.

The PHA will not perform an interim reexamination when a family reports an increase in income (whether earned or unearned income) within three months of their annual reexamination effective date. However, families who delay reporting income increases until the last three months of their certification period may be subject to retroactive rent increases in accordance with the PHA policies in Chapter 14.

OLD **12-I.E. Mandatory Policies and Other Authorized Terminations: Use of Illegal Drugs and Alcohol Abuse**

PHA Policy

The PHA will terminate a family's assistance if any household member is currently engaged in any illegal use of a drug or has a pattern of illegal drug use that interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.

The PHA will terminate assistance if any household member's abuse or pattern of abuse of alcohol threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.

Currently engaged in is defined as any use of illegal drugs during the previous three months.

The PHA will consider all credible evidence, including but not limited to, any record of arrests, convictions, or eviction of household members related to the use of illegal drugs or abuse of alcohol.

A record or records of arrest will not be used as the sole basis for the termination or proof that the participant engaged in disqualifying criminal activity.

In making its decision to terminate assistance, the PHA will consider alternatives as described in Section 12-II.C and other factors described in Sections 12-II.D and 12-II.E. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate assistance.

New **12-I.E. Mandatory Policies and Other Authorized Terminations: Use of Illegal Drugs and Alcohol Abuse**

PHA Policy

The PHA will terminate a family's assistance if any household member is currently engaged in any illegal use of a drug or has a pattern of illegal drug use that interferes with the health, safety, or right to peaceful enjoyment of the premises by other residents.

The PHA will terminate assistance if any household member's abuse or pattern of abuse of alcohol threatens the health, safety, or right to peaceful enjoyment of the premises by other residents.

Currently engaged in is defined as any use of illegal drugs during the previous three months.

The PHA will consider all credible evidence, including but not limited to, any record of arrests, convictions, or eviction of household members related to the use of illegal drugs or abuse of alcohol.

In making its decision to terminate assistance, the PHA will consider alternatives as described in Section 12-II.C and other factors described in Sections 12-II.D and 12-II.E. Upon consideration of such alternatives and factors, the PHA may, on a case-by-case basis, choose not to terminate assistance.

OLD **Asset Verifications: Bank Statements**

PHA Policy

Provide all pages of **the most recent bank statement**

NEW **Asset Verifications: Bank Statements**

PHA Policy

Provide all pages of **the most recent three months of bank statements**