Proposed CCHA Administrative Plan Revisions as required by HOTMA

Overview of revisions by chapter

Chapter 1: Program Overview

- This chapter contains only minor corrections and clarifications.

Chapter 2: Fair Housing and Equal Opportunity

- This chapter contains only minor corrections and clarifications.

Chapter 3: Eligibility

- Added policy that a family's revocation of consent to allow CCHA access to records from financial institutions will result in denial of assistance.
- Added language describing required pre-admission Enterprise Income Validation (EIV) reports.
- Added language on asset limitation for applicant families [under HOTMA, PHAs must deny assistance to applicants who have 1) Net family assets that exceed $100,000 (adjusted annually for inflation); and/or 2) A present ownership in, a legal right to reside in, and the legal authority to sell, real property that is suitable for occupancy.]

Chapter 4: Applications and Waiting List

- Removal of the waiting list preference for EHV families at risk of losing assistance due to lack of program funding.

Chapter 5: Briefings and Voucher Issuance

- Updated policy language to include an option for remote briefings.

Chapter 6: Income and Subsidy Determination

- Added language clarifying the calculation of income at admission and annual reexamination [under HOTMA, annual income is anticipated at admission; at annual reexamination, income received during the prior 12-month period is used.]
- Removed policies regarding Earned Income Disallowance [under HOTMA, EID is discontinued.]
- Updated language regarding the calculation of Student Financial Assistance under HOTMA.

- Added language regarding the determination and description of Net Family Assets [under HOTMA, the PHA must include the value of non-necessary items of personal property if the combined value exceeds $50,000 (adjusted annually for inflation).]
- Added language describing Hardship Exemptions for Health/Medical Care Expenses and Reasonable Attendant Care and Auxiliary Apparatus Expenses-General Relief [under HOTMA, thresholds for medical expense deductions will increase from three percent to ten percent, and qualifying families will have this change phased-in through hardship exemption policies: year 1 at 5%, year two at 7.5%, year 3 at 10%.]
- Added language describing Hardship Exemption to Continue Child Care Expenses Deduction [under HOTMA, families who are unable to pay rent when a childcare expense deduction is ending have the option to request continuation of the childcare expense deduction through hardship exemption policies.]
- Added language describing CCHA's policy for Determination of Family's Inability to Pay Rent [under HOTMA, CCHA has discretion to establish policies for the purpose of determining eligibility for general hardship relief for the health and medical care expense deduction and for the childcare expenses hardship exemption.]
- Added policy language clarifying that CCHA will not allow Permissive Deductions [under HOTMA, PHAs have the option to allow additional deductions to annual income.]

Chapter 7: Verification

- Added language describing CCHA's policy to accept Self-Certification of Net Family Assets [under HOTMA, CCHA has the option to accept self-certification of net family assets for families with net assets totaling $50,000 or less.]
- Added language describing CCHA's policy for the Authorization for the Release of Information Form 9886 [under HOTMA, once a program applicant or participant has signed and submitted a consent form, they do not need to resubmit a subsequent Form 9886 at the next recertification unless a family member turns 18 or is an adult being added to the assisted household.]
- Added language describing CCHA's policy for the Revocation of Consent stating that families who revoke consent of access to financial information will be denied assistance or terminated from the program.
- Added language clarifying the CCHA will not implement "Safe Harbor" income determinations from other federal means-tested forms of assistance as allowed under HOTMA.
- Added language describing CCHA's policy for verification of Social Security Numbers.

- Added language describing CCHA's policy that periodic zero income reviews will not be conducted, and zero income forms will not be required.

Chapter 8: Inspections and Rent Reasonableness

- Added language describing the NSPIRE standards, and removal of language describing HQS standards.
- Added table outlining "Life Threatening Deficiencies" as defined under NSPIRE standards.

Chapter 9: General Leasing Policies

- This chapter contains only minor corrections and clarifications.

Chapter 10: Moving with Continued Assistance and Portability

- Added language describing CCHA's policy to issue a voucher to families requesting to move due to a unit that is in abatement within 10 days of the family's notice to move.
- Added language describing CCHA's policy on voucher extensions under portability, clarifying that if the initial PHA extends the term of the voucher, the receiving PHA's voucher will expire 30 calendar days from the new expiration date of the initial PHA's voucher.

Chapter 11: Reexaminations

- Added language describing CCHA's policy that an interim reexamination will be conducted anytime the family reports an income decrease of any amount. [Under HOTMA, PHAs have the option to decline to conduct an interim reexamination of family income if the PHA estimates the family's adjusted income will decrease by an amount that is less than 10% of the family's annual adjusted income.]
- Added language describing CCHA's policy that no interim reexamination will be conducted anytime the family reports an earned income increase of any amount. [Under HOTMA, PHAs have the option to conduct an interim reexamination for an increase in earned income if the family has undergone an interim reexamination for a decrease in income after the completion of the last annual reexamination.]

Chapter 12: Terminations

- Added language describing CCHA's policy of limited enforcement of the asset limitation at annual and interim reexamination, giving families a period of 6 months to cure noncompliance with the asset limitation. [Under HOTMA, PHAs can choose a policy of total non-enforcement, total enforcement, or limited enforcement of the asset limitation for participants.]

Chapter 13: Owners

- This chapter contains only minor corrections and clarifications.

Chapter 14: Program Integrity

- Added language describing CCHA's de minimis errors policy, which states that CCHA will directly reimburse a family for any family overpayment of rent that was the result of staff-caused error.

Chapter 15: Special Housing Types

- This chapter contains only minor corrections and clarifications.

Chapter 16: Program Administration

- Added language updated by HUD pertaining to payment standards.
- Updated policy language to include an option for remote Informal Reviews (denial of assistance) and Informal Hearings (termination of assistance).

Chapter 17: Project Based Vouchers

- This chapter contains only minor corrections and clarifications.

Chapter 18: Emergency Housing Vouchers

- Removal of this chapter as the EHV program has the EHV program has permanently ended.

Chapter 19: Special Housing Types

- This chapter contains only minor corrections and clarifications, including the renumeration as Chapter 18 following the removal of the EHV chapter.