

Summary of ACOP and Admin Plan changes for spring 2023 comment period

ACOP

- 1) Explanation of the end of the use of emergency waivers on May 11th, 2023, when the declared Covid-19 emergency ends. Pages 7-8.
- 2) Update language regarding reasonable accommodations to incorporate guidance included in the Joint Statement of HUD and the Department of Justice on *Reasonable Accommodations Under the Fair Housing Act*. Pages 10-12.
- 3) An update to requirements for consent forms, effective January 1st, 2024, via HOTMA, that requires consent forms to include consent for financial statements and for consent forms to only be signed once. Pages 26-27
- 4) Restrictions for admission and tenancy, effective January 1st, 2024, via HOTMA, including families with assets valued over \$100,000 and families with real property (with many exceptions). Pages 34-36. (These restrictions are listed in both the eligibility for admission and termination sections.)
- 5) Deconcentration policy clarification, page 44.
- 6) A new chapter, effective January 1st, 2024, via HOTMA, that describes the entire determination of income methodology that becomes effective January 1st, 2024. This includes new/changed exclusions from income and new/changed deductions. Pages 57-67.
- 7) Update to Flat Rent calculation methodology, reflecting practice of setting flat rents to 80% of Fair Market Rates. Page 80.

- 8) Implementation of over-income policies enacted by HOTMA Section 103. These policies include a new calculation to determine whether a Family is over-income and LMHA's decision to continue housing such Families under new stipulations. Pages 92-94
- 9) Updates to the recertification process, effective January 1st, 2024, via HOTMA, including mandatory and optional interim recertification triggering events, and the method rent increases and decreases are imposed. Pages 96-97.
- 10) Clarification of voluntary transfer policy, that only residents living in non-high-rises may request moves to high-rises. Page 98.
- 11) Restrictions for admission and tenancy, effective January 1st, 2024, via HOTMA, including Families with assets valued over \$100,000 and Families with real property (with many exceptions). Pages 114-115. (These restrictions are listed in both the eligibility for admission and termination sections.)
- 12) Added policies implemented by the reauthorization of the Violence Against Women Act 2022, including added definitions for Economic Abuse and Technological Abuse, prohibitions against retaliation for reporting, and the right to report crimes from one's own home. Pages 122-123.
- 13) Glossary updates:
 - a. Added definitions, effective January 1st, 2024, via HOTMA, for Day Laborer, Foster Adult, Foster Child, Health and Medical Care Expenses, Independent Contractor, Minor, and Seasonal Worker.
 - b. Updated definitions, effective January 1st, 2024, via HOTMA, for Dependent, Family, Net Family Assets, Responsible Entity.

- c. Updated definitions, effective now, for Homeless.

ADMIN PLAN

- 1) Explanation of the end of the use of emergency waivers on May 11th, 2023, when the declared Covid-19 emergency ends. Page 7.
- 2) Added policies implemented by the reauthorization of the Violence Against Women Act 2022, including added definitions for Economic Abuse and Technological Abuse, prohibitions against retaliation for reporting, and the right to report crimes from one's own home. Pages 28-29.
- 3) Clarification for what HUD requires for Citizen and Noncitizen verification. Page 34.
- 4) An update to requirements for consent forms, effective January 1st, 2024, via HOTMA, that requires consent forms to include consent for financial statements and for consent forms to only be signed once. Pages 37-38.
- 5) Restrictions for admission and tenancy, effective January 1st, 2024, via HOTMA, including Families with assets valued over \$100,000 and Families with real property (with many exceptions). Pages 41-43. (These restrictions are listed in both the grounds for denial and termination sections.)
- 6) Notice of the Tenant-Based Waitlist closing on July 1, 2024 with a list of excepted Applicant Families. Page 46.
- 7) A new chapter, effective January 1st, 2024, via HOTMA, that describes the entire determination of income methodology that becomes effective January 1st, 2024. This includes new/changed exclusions from income and new/changed deductions. Pages 65-75.

- 8) Change of maximum number of occupants in 0 bedroom units from 1 to 2, reflecting an occupancy standard change to provide more housing opportunities to HCV holders.

Page 76.

- 9) Updates to voucher term extensions and tolling, including the suspension/tolling practice mandated by HUD for the length of time a voucher holder must secure a unit.

Page 80.

- 10) Updated policy that reflects LMHA's current verification hierarchy and the HUD mandated use of the EIV system. Pages 97-100.

- 11) Updated policy for how LMHA determines Rent Reasonableness and the maximum rent increase, including removal of the payment standard and mathematical formula as maximum rent increases. (These changes take effect July 1st, 2023, or with implementation of appropriate software, whichever is later.) Page 108.

- 12) Clarification that repayment agreements are required when an applicant or participant owes a debt to LMHA. Page 120.

- 13) Restrictions for admission and tenancy, effective January 1st, 2024, via HOTMA, including Families with assets valued over \$100,000 and Families with real property (with many exceptions). Pages 121-123. (These restrictions are listed in both the grounds for denial and termination sections.)

- 14) Updates to the recertification process, effective January 1st, 2024, via HOTMA, including mandatory and optional interim recertification triggering events, and the method rent increases and decreases are imposed. Pages 145-146.

- 15) PBV plans for Iroquois Senior Living Community. Page 192.

16) Glossary updates:

- a. Added definitions, effective January 1st, 2024, via HOTMA, for Day Laborer, Health and Medical Care Expenses, Independent Contractor, Minor, and Seasonal Worker.
- b. Updated definitions, effective January 1st, 2024 via HOTMA, for Dependent, Family, Foster Adult, Foster Child, Net Family Assets, Responsible Entity.
- c. Updated definitions, effective now, for Homeless.

17) Insertion of the payment standard exception area map that LMHA currently uses. Page 287.

18) Additional Special Referral agency partners added and voucher number adjustments for some participating agencies. Pages 392-395.