



EXHIBIT A
Public Housing Admissions & Continued Occupancy Policy
Summary of Changes

The Lake County Housing Authority Public Housing Admissions & Continued Occupancy Policy has been significantly modified. Throughout the Policy the following summarized changes have been made. These changes represent updated language, clarifying language and are changes supported and or recommended by Nan McKay & Associates [“NMA”], the new NSPIRE Inspection protocol, HUD HOTMA Changes, PIH 2023-27 and staff recommendations.

> > > > **Special Note** < < < <

PHAs are required to fully comply with HOTMA by January 1, 2025, and are required to update their policies by a specific date in 2024 (July 18, 2024). However, PHAs cannot fully comply with the requirements of HOTMA until the IMS/PIC system has transitioned to the new Housing Information Portal (HIP) system later this year, and the PHA’s software vendor has provided updated software.

Throughout this modified Plan, indications of Pre HOTMA and Post HOTMA policy will be noted. LCHA will operate Pre HOTMA until the HUD requirements of HIP and updated software are met and an official cut over date is determined. Once HIP and the software updates are complete, at the cut over date LCHA will operate utilizing the Post HOTMA policies.

- ❖ General grammar, typo corrections and document formatting changes have been made throughout the policy. Upon acceptance of changes, additional minor formatting changes may occur including pagination, footer, and table of contents update.
- ❖ General non policy changing language has been added and or removed to clarify the existing policies and verbiage.
- ❖ Regulatory updates have been added or modified to be current with HUD Regulations and PIH Notices.
- ❖ Within the summarized listing below, underlined italics have been used to indicate where LCHA policy changes have been made.

> > > > Summary of Changes < < < <

ELIGIBILITY AND INTAKE

- Nearly elderly changed to age 50 and clarify **building designations**.
- Added the reference to Net Family Assets, Asset Income and owning a home you could live in.
- Clarified immigration status for at least one family member.
- Added in reference to using the updated HUD-9886 consent form.
- Policy – Updated the Local Preferences by including a Veteran preference. Preferences will match the Housing Choice Voucher program (Public Housing is designated Elderly).



TENANT SELECTION AND ASSIGNMENT PLAN

- Updated language on “good cause” for refusal of a unit offer.

LEASING POLICIES

- Additional language regarding pet deposits for assistive animals verified to be needed by residents with disabilities and are not pets.

ANNUAL REEXAMINATIONS OF INCOME AND FAMILY CIRCUMSTANCES

- Additional language regarding net family assets valued at over \$100,000 and who do not own a home they could live in.
- *Policy* – clarified LCHA policy language regarding net family assets over \$100,000 and ability to cure noncompliance.
- Added HOTMA clarifying language for reexaminations.
- Added HOTMA clarifying language for over-income tenants.

INTERIM RENT ADJUSTMENTS: MODIFIED FIXED RENT SYSTEM

- Updated the language for HOTMA compliance on interim increase and decrease rent adjustments.
- Removed Earned Income Disallowance.

DETERMINING INCOME AND RENT

- Added HOTMA updated language for income and what is excluded income.
- Updated HOTMA language for adjusted income.

DEFINITIONS OF TERMS USED IN THIS STATEMENT OF POLICIES

- Added Day Laborer, Foster Child, Health and Medical Care Expenses, Home you Could Live in, Independent Contractor, Seasonal Worker,
- Updated the definition of Family, Medical Expense Allowance, Net Family Assets, Total Tenant Payment, Unearned Income.

Pre HOTMA Detail of what will/will not be implemented

Our agency cannot implement the income and asset requirements in Sections 102 and 104 of HOTMA without having access to the revised HUD-50058 in HIP. For now, PHAs must continue to report HUD-50058 transactions to IMS/PIC until instructed to do otherwise.

Industry experts encourage PHAs to implement the following specific provisions of HOTMA that do not require HIP, described below. Some are requirements and others are options PHAs can exercise irrespective of HIP:

- PHAs **must not** enroll families into the Earned Income Disregard (EID).
- PHAs **may** now implement the “Safe Harbor” income verification option of the HOTMA final rule.
- PHAs **may** begin using the new HUD-9886-A Authorization for the Release of Information/Privacy Act Notice.
- Verifications streamlining that allows PHAs to: accept third-party documents dated within 120 days of receipt, use an award letter from the appropriate year for benefits that are set annually, and use a self-certification of SSN.

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