VIRGINIA VILES SERVICES, LLC

HOTMA: Public Housing, HCV/PBV and Section 8 PBRA / Multifamily

Program Differences Reference Guide

Prepared by Virginia Viles Services, LLC

Revision 2 (October 2026) | Updated for PIH 2026-09, PIH 2026-15, H 2025-07, and HUD's Sept. 29, 2026 HOTMA FAQs

Always verify current HUD guidance and your approved plan documents before relying on this guide.

HOTMA (the Housing Opportunity Through Modernization Act of 2016) added three operative sections to HUD's income and asset rules: Section 102 (income reviews), Section 103 (Public Housing over-income limits), and Section 104 (asset limits). Sections 102 and 104 amend the shared income and asset regulations at 24 CFR Part 5, Subpart F. That is why the substance and dollar figures are nearly identical across Public Housing, Housing Choice Vouchers (HCV), Project-Based Vouchers (PBV), and Section 8 PBRA / Multifamily. Section 103 is written into the Public Housing statute and does not extend to any other program. Everything else that differs is mostly administrative: which office issues guidance, which notice series to cite, which form and system are used, which plan document governs, and, for now, which **compliance date** applies.

Program Comparison

Topic	Public Housing	HCV / PBV / RAD PBV	Section 8 PBRA / Multifamily (incl. RAD PBRA)	
Oversight office	Office of Public and Indian Housing (PIH)	PIH	Office of Housing (Multifamily)	**Different**
Notice series	PIH-numbered notices (PIH 2023-27, 2024-38, 2026-09, 2026-15)	Same PIH notices	H-numbered notices (H 2023-10, 2024-09, 2025-03, 2025-07)	**Different**
Governing regulations	24 CFR Part 960; Part 5 Subpart F for income and assets	24 CFR Part 982 (HCV) and Part 983 (PBV, including RAD PBV); Part 5 Subpart F	24 CFR Part 880 et seq. (Section 8 PBRA, including RAD PBRA); Part 5 Subpart F	**Different**
Governing plan document	ACOP	Administrative Plan (PBV chapter for PBV and RAD PBV)	Tenant Selection Plan (TSP)	**Different**
Certification form	Form HUD-50058	Form HUD-50058	Form HUD-50059	**Different**
Income verification system	EIV with PIC	EIV with PIC	EIV with TRACS	**Different**
Section 102: income reviews (10% interim increase threshold, household-change interim, consent signed once, Safe Harbor, EIV not required at interim, 10% medical threshold, deductions, exclusions)	Applies in full	Applies in full	Applies (Section 8 PBRA, 202 and 811 under Section 102)	**Shared**
Section 103: over-income limits (120% of AMI), 24-month tracking, NPHOI / alternative rent	Applies	Does not apply	Does not apply	**PH only**

Topic	Public Housing	HCV / PBV / RAD PBV	Section 8 PBRA / Multifamily (incl. RAD PBRA)	
Section 104: asset limitation, self-certification threshold, asset exclusions	Applies in full	Applies in full	Applies to Section 8 PBRA. Confirm with HUD Multifamily for 202/811 and other programs.	**Shared**
2026 / 2027 dollar figures	Identical	Identical	Identical	**Shared**
Current compliance date for remaining Section 102/104 provisions	January 1, 2027 (PIH 2026-15)	January 1, 2027 (PIH 2026-15). RAD PBV follows the PBV rules; HUD's notices do not address RAD separately, so confirm with your HUD RAD transaction manager.	January 1, 2027 (H 2025-07). RAD PBRA follows PBRA rules; confirm with HUD Multifamily.	**Shared**
Moving to Work (initial and Expansion) and FRS-only agencies	**Date pending.** Exempt from Jan. 1, 2027. HUD will communicate the date. The exemption covers the whole agency (HUD FAQ, Sept. 29, 2026).	**Date pending** (same)	Not applicable	**Pending**
Compliance date history	PIH 2023-27 (joint) → PIH 2024-38 (July 1, 2025 for specified provisions) → PIH 2026-15 (Jan. 1, 2027)	Same	H 2023-10 (joint) → H 2024-09 (Sept. 20, 2024; Jan. 1, 2025 to July 1, 2025) → H 2025-03 (Jan. 1, 2026) → H 2025-07 (Jan. 1, 2027)	**Different**
Flat rent and triennial income review	Applies. Flat rent is Public Housing only (24 CFR 960.253); flat-rent families get an income review every 3 years (960.257(a)).	Not applicable	Not applicable. No flat-rent option under Section 8 PBRA.	**PH only**
Streamlined income determination for fixed-income families	24 CFR 960.257(c)	24 CFR 982.516 (HCV and PBV)	24 CFR 5.657(d)	**Different**
Resident notice content	Include the Section 103 over-income election	Omit Section 103 entirely	Omit Section 103 entirely	**PH only**

Two items to confirm with HUD. (1) HUD's notices do not mention RAD directly. The RAD Notice applies the PBV rules (24 CFR part 983) to RAD PBV and the PBRA rules (24 CFR part 880) to RAD PBRA, so we treat each as following its parent program. (2) Secondary sources report that Section 104 reaches only Section 8 PBRA among Multifamily programs. Confirm with HUD Multifamily (MFH_HOTMA@hud.gov) before applying the asset limitation to 202 or 811 properties.

2026 / 2027 Figures: Shared Across All Programs

Because Sections 102 and 104 amend the same Part 5 definitions, these figures are identical for Public Housing, HCV, PBV, and Section 8 PBRA / Multifamily. HUD publishes updated figures annually, effective the following January 1. They apply to agencies that are complying with Sections 102 and 104 for the transaction.

Item	2026	2027
Asset limitation	$105,574	$109,797
Self-certification / imputed-asset-income threshold	$52,787	$54,898
Elderly/disabled family deduction	$550	$575
Dependent deduction	$500	$525

Item	2026	2027
Full-time student earned income exclusion	$500	$525
Adoption assistance payment exclusion	$500	$525
Passbook savings rate	0.40%	0.38%

Fixed by rule, not adjusted for inflation, in every program: the medical/attendant-care deduction threshold (10% of annual income, up from 3% pre-HOTMA, with phased-in relief for eligible families) and the de minimis income error amount ($30 per month, $360 per year).

Which Document Do I Need?

- **Public Housing:** use the ACOP, PIH-notice citations, Form HUD-50058, and include the Section 103 over-income notice and election with residents.
- **HCV (tenant-based):** use the Administrative Plan and PIH citations. Section 103 does not apply. Sections 102 and 104 apply.
- **PBV and RAD PBV:** use the Administrative Plan (PBV chapter). Section 103 does not apply. Sections 102 and 104 apply on the PBV date.
- **Section 8 PBRA / other Multifamily (including RAD PBRA):** use the Tenant Selection Plan, H-notice citations, Form HUD-50059, and omit Section 103 from resident-facing notices.
- **Moving to Work agencies:** use your ACOP or Administrative Plan *and* your MTW Plan. HUD has not announced your HOTMA date. Adopt the policy language now so you are ready.
- **An agency operating both Public Housing and Section 8 PBRA** needs two separate sets of HOTMA documents, one per program, because the ACOP/TSP, notice citations, and Section 103 applicability all differ even though the dollar figures match.

Key Notice Citations

Public Housing / HCV / PBV (PIH series): PIH 2023-27 (original joint implementation guidance); PIH 2024-38 (July 1, 2025 for specified income provisions); PIH 2026-09 / H 2026-05 (interim reexamination standard, April 13, 2026); PIH 2026-15 (January 1, 2027 for the remaining Section 102/104 provisions, May 14, 2026); HUD HOTMA Implementation FAQs for PHAs (Sept. 29, 2026). Section 103: PIH 2023-03.

Section 8 PBRA / Multifamily (H series): H 2023-10 (original joint implementation guidance); H 2024-09 (Sept. 20, 2024; extends from January 1, 2025 to July 1, 2025); H 2025-03 (extends to January 1, 2026); H 2025-07 (published Dec. 30, 2025; extends to January 1, 2027).

RAD: RAD Notice Rev-4, as amended by Supplemental Notices 4B and 4C (Notice H-2025-01 / PIH-2025-03), Sec. 1.2.A (PBV) and Sec. 1.2.B (PBRA).