VIRGINIA VILES SERVICES, LLC

PHA ACOP & Administrative Plan
HOTMA Policy Selection Checklist

Instructions: Work through the sections below with the matching section of the HOTMA Policy Readiness Guide. Check **only** the boxes you are choosing. Each row shows which programs it covers. Check the program(s) and HOTMA date for your agency in the header first. Rows labeled **HUD Required** need no selection (just confirm the language). Rows labeled **Your Choice** need an answer. **Optional** and **VVS Recommended** items are yours to adopt or skip. Return the completed checklist to Virginia Viles Services, LLC so your ACOP or Administrative Plan can be updated to match.

Version: October 2026 | Companion to the HOTMA Policy Readiness Guide (Revision 2: program applicability and MTW/RAD dates; updated for PIH 2026-09, PIH 2026-15, and HUD's Sept. 29, 2026 FAQs)
Always verify current HUD regulations, HUD Notices, and your agency's approved ACOP/Administrative Plan before implementation.

PHA / Agency Information	Return Information
Agency Name: _____ **Contact Person:** _____ **Email / Phone:** _____ **Program(s):** ☐ Public Housing ☐ HCV ☐ PBV ☐ RAD PBV **Agency is:** ☐ MTW (initial) ☐ MTW Expansion ☐ FRS-only **HOTMA date that applies:** ☐ Jan. 1, 2027 ☐ Pending (MTW / FRS-only) ☐ Other: _____ **Policy effective date:** _____	**Return completed checklist to:** **Virginia Viles Services, LLC** Email: support@virginiavilesservices.com Phone: 214-235-0770 **Date Returned:** _____

HUD REQUIRED — HUD already decided. No selection.
YOUR CHOICE — You must pick.
OPTIONAL — HUD allows it; you may skip it.
VVS RECOMMENDED — Good practice, not a HUD rule.

Policy Selection Checklist — Sections 1–12

Section	Your Selection	Notes / Local Details
1. Governing Authority HUD REQUIRED Guide Section 1 **Programs:** all; MTW date pending. PH: ACOP. HCV/PBV/RAD PBV: Admin Plan. MTW: also your MTW Plan.	**HUD required — no selection needed** ☐ Adopt the required governing-authority language. **Fill in** HOTMA provisions effective date: _____ ☐ MTW agencies only: MTW Plan waivers that affect HOTMA rules identified (list in notes) ☐ RAD PBV converted projects covered by the PBV chapter of the Administrative Plan	_____ _____

Section	Your Selection	Notes / Local Details
2. Annual Income HUD REQUIRED Guide Section 2 **Programs:** all; MTW date pending.	**HUD required — no selection needed** ☐ Adopt the required annual income language. (HUD sets the income period for each exam type, so there is no local income method to choose.)	_____ _____
3. Assets, Asset Limitation & Real Property HUD REQUIRED YOUR CHOICE OPTIONAL VVS RECOMMENDED Guide Section 3 **Programs:** all; MTW date pending.	**Admission (HUD required — no selection)** ☐ Adopt required admission asset-limit and real property language. **Real property: define "geographic hardship" (choose one)** ☐ Written parameters — one-way commute over _____ miles / _____ minutes ☐ Decide case by case with documented facts **Existing families over the asset limit at reexamination (choose one)** ☐ Total non-enforcement ☐ Total enforcement — delay termination up to _____ months (max 6) ☐ Limited enforcement with cure period — _____ months (max 6) **Optional** ☐ Add an exception policy (describe families in notes) **VVS recommended** ☐ Supervisor/Compliance Officer review before any asset-based adverse action	_____ _____ _____
4. Asset Self-Certification YOUR CHOICE VVS RECOMMENDED Guide Section 4 **Programs:** all; MTW date pending. PH: 24 CFR 960.259(c)(2). HCV/PBV/RAD PBV: 982.516(a)(3).	**At admission (choose one)** ☐ Accept signed asset statement ☐ Verify assets with third-party documents **At annual reexamination (choose one)** ☐ Accept signed asset statement (full third-party verification required at least every 3 years) ☐ Verify assets with third-party documents **VVS recommended** ☐ Extra verification when information conflicts, is missing, or assets are close to the threshold	_____ _____

Section	Your Selection	Notes / Local Details
5. Interim Reexaminations HUD REQUIRED YOUR CHOICE OPTIONAL VVS RECOMMENDED Guide Section 5 **Programs:** all; MTW date pending. PH: 24 CFR 960.257. HCV/PBV/RAD PBV: 982.516(c). MTW: check your waivers.	**HUD required — no selection needed** ☐ Adopt required interim language: 10% income-increase threshold, and an interim for every household member added or removed (PIH 2026-09). **Decrease threshold (choose one)** ☐ 10% ☐ Lower percentage: _____% (percent only, not dollars) **Fill in** Reporting deadline: _____ days from the change **Optional (check any you adopt)** ☐ Skip interims for increases / household changes in the last 3 months before annual reexam ☐ Count earned income increases after a prior interim decrease (review EIV New Hires report at least quarterly) ☐ Several changes reported at once: process separately (or) together — state which in policy (HUD FAQ Q2) ☐ Allow retroactive decreases for late reports (not earlier than HUD's limit) ☐ Rounding rule for percentages: _____% rounds to 10% **VVS recommended** ☐ File note on every reported change, processed or not	_____ _____ _____
6. Safe Harbor OPTIONAL VVS RECOMMENDED Guide Section 6 **Programs:** all; MTW date pending.	**Will the agency use Safe Harbor? (choose one)** ☐ No — do not use Safe Harbor (fully compliant) ☐ Yes — use it as follows: Programs accepted: _____ **When used (check any)** ☐ Admission ☐ Annual reexamination ☐ Interim reexamination **More than one determination** ☐ Use the most recent ☐ Use a priority order listed in policy **VVS recommended** ☐ Supervisor sign-off and document age limit	_____ _____

Section	Your Selection	Notes / Local Details
7. De Minimis Errors HUD REQUIRED YOUR CHOICE VVS RECOMMENDED Guide Section 7 **Programs:** all; MTW date pending.	**HUD required — no selection needed** ☐ Adopt required rule: $30/month ($360/year) threshold; credit or repay overcharges; never require repayment of an agency-caused undercharge. **How will overcharges be repaid? (choose one)** ☐ Credit against future rent (pay balance if assistance ends) ☐ Refund or HAP adjustment within _____ days **VVS recommended internal review (check any)** ☐ Supervisor/QC confirms de minimis classification ☐ Trained staff use a checklist, with QC sampling ☐ Executive approval for credits/repayments over $_____	_____ _____
8. Annual Threshold Review VVS RECOMMENDED Guide Section 8 **Programs:** all; MTW date pending.	**HUD requires current-year amounts; how you track them is your choice** ☐ Compliance Officer or designee reviews each Aug/Sept ☐ Administrative addendum update (no Board action) ☐ Board approves each annual update ☐ Cross-functional team reviews Responsible position: _____	_____
9. Verification & Documentation HUD REQUIRED YOUR CHOICE OPTIONAL Guide Section 9 **Programs:** all; MTW date pending.	**HUD required — no selection needed** ☐ Adopt required verification-hierarchy and file-documentation language. **Local procedures (check all you adopt)** ☐ Document age limit: _____ days ☐ Third-party verification triggers (conflict, missing, suspected fraud, QC concern) **EIV at interim reexaminations (optional — choose one)** ☐ Use EIV at interims ☐ Do not use EIV at interims	_____ _____

Section	Your Selection	Notes / Local Details
10. Deductions & Hardship Relief HUD REQUIRED YOUR CHOICE OPTIONAL VVS RECOMMENDED Guide Section 10 **Programs:** all; MTW date pending.	**HUD required — no selection needed** ☐ Adopt required deduction language, including the 10% medical threshold and phased-in relief. (HUD is changing who qualifies for phased-in relief; watch for the final rule.) **Hardship procedures (write definitions in notes)** ☐ Hardship defined for medical/attendant care and for childcare ☐ No additional 90-day extensions ☐ Allow additional 90-day extensions: _____ (or ☐ no maximum) ☐ Written request and documents required **Optional** ☐ Adopt additional (permissive) deductions — finance team has reviewed costs **VVS recommended** ☐ Supervisor approval and written notice for every hardship action	_____ _____ _____
11. Notices to Families HUD REQUIRED Guide Section 11 **Programs:** all; MTW date pending. PH: grievance procedure. HCV/PBV/RAD PBV: informal hearing/review.	**HUD required — no selection needed** ☐ Adopt required notice language. **Fill in local details** Response deadline: _____ days Hearing contact: _____ ☐ Language-access (LEP) / translation process described	_____
12. Form HUD-9886-A & Revocation of Consent HUD REQUIRED YOUR CHOICE Guide Section 12 **Programs:** all; MTW date pending. All programs: 24 CFR 5.230, 5.232.	**HUD required — no selection needed** ☐ Confirm Form HUD-9886-A is in use (required since Feb. 1, 2025). **If a family revokes consent (choose one)** ☐ Deny admission / terminate assistance ☐ Deny applicants; current families continue until next reexam and must sign a new consent ☐ Require a new consent by the next reexamination	_____

Authorization: By returning this checklist, the PHA confirms these selections should be used to update the agency's policy draft, subject to final agency review, Board approval where required, and current HUD guidance.

Authorized Representative: _____ Date: _____

13. Final Policy-to-Practice Cross-Check VVS RECOMMENDED

Use before adopting final language. Confirm each decision above is written into policy and also reflected in forms, software, notices, staff procedures, and file notes.

☐ Effective date, governing authority, and the HOTMA enforcement date for your agency (Jan. 1, 2027 for Public Housing, HCV, PBV, and RAD PBV; date pending for MTW and FRS-only agencies; confirm RAD PBRA with HUD Multifamily).

☐ Asset limit at admission, geographic hardship standard, and the approach for existing families (cure period or exception policy, if any).

☐ Asset self-certification answers for admission and annual reexamination, and the 3-year full-verification control.

☐ Interim rules: 10% increase, household-change rule, decrease percentage, reporting deadline, optional rules.

☐ Safe Harbor decision and, if used, programs, timing, and multiple-determination handling.

☐ De minimis rule and overcharge repayment method.

☐ Verification hierarchy, document age limits, tenant declaration standards, and EIV use at interims.

☐ Hardship definitions, extensions, request process, deductions, and notice language.

☐ Form HUD-9886-A in use and the revocation-of-consent consequence.

☐ Annual threshold review: who updates the 2026 and 2027 amounts, and when.

☐ Notices state the decision, reason, deadline, and review, hearing, or grievance rights.

Final check: If a choice is selected here but not reflected in policy, forms, software, notices, staff procedures, and file notes, implementation is not complete.