PHA ACOP & Administrative Plan HOTMA Policy Selection Checklist

Instructions: Please complete this checklist, select the policy choices your PHA wants adopted, add any local notes, and return it to Virginia Viles Services, LLC so your ACOP or Administrative Plan can be updated according to your selections. This checklist covers Public Housing, HCV, and PBV programs administered under a PHA ACOP/Administrative Plan. A separate Multifamily/PBRA HOTMA TSP Readiness Checklist is available for Tenant Selection Plans.

Version: August 2026 | Companion to the 2026 HOTMA Policy Readiness Guide
Always verify current HUD guidance 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	Return completed checklist to: **Virginia Viles Services, LLC** Email: support@virginiavilesservices.com Phone: 214-235-0770 Date Returned: ______________________________

Implementation Status key: **Required Now** — HUD compliance deadline has already passed. **Conditional** — required only once your agency/program is complying with HOTMA Sections 102/104; confirm current status. **Optional / Discretionary** — a genuine PHA policy choice with no single HUD-required answer. ***VVS Recommended*** — a suggested administrative control, not a HUD-mandated selection.

Policy Selection Checklist — Sections 1–12

Section	Status	PHA Selection	Notes / Local Details
1. Governing Authority & Implementation Status	**Required Now**	☐ Use standard mandatory language ☐ Customize implementation date / Board language *This checklist labels every section below using the status key above so your team can tell a current requirement apart from a readiness decision.*	______________ ______________ ______________
2. Annual Income / Required HOTMA Updates	**Required Now (since July 1, 2025 — PIH 2024-38)**	☐ Use standard mandatory language ☐ Add local income method details *Covers the HOTMA income exclusions, definitions, and de minimis methodology that HUD required for all transactions effective July 1, 2025 and later.*	______________ ______________ ______________

Section	Status	PHA Selection	Notes / Local Details
3. Asset Limitation & Real Property	Conditional	**New Admission:** HUD required baseline — deny assistance if over the limit; no PHA discretion. **Annual/Interim Reexamination (existing households)** — select ONE: ☐ Total non-enforcement ☐ Total enforcement (within 6 months) ☐ Limited enforcement with cure period Cure period: ______ months (up to 6; longer only for a disability-related need) Exception policy adopted: ☐ Yes ☐ No Families/ categories covered: ____________ Real property option: ☐ A (disqualifying unless exception) ☐ B (suitability review before action) ☐ C (supervisory approval before notice)	
4. Asset Self-Certification	Conditional	Accept self-certification at admission: ☐ Yes ☐ No Accept self-certification at annual reexamination: ☐ Yes ☐ No Require additional (third-party) verification when red flags or close-to-threshold concerns exist: ☐ Yes ☐ No *HUD baseline (not a PHA choice): full third-party verification at least once every 3 years.*	
5. Interim Reexaminations	Mixed	*Income increase threshold: 10% (HUD-mandatory — not PHA-selectable)* Decline an interim if the increase occurred within 3 months of the next annual reexam: ☐ Yes ☐ No Income decrease threshold selected by PHA (must be 10% or lower): ______ % Earned income following a prior interim decrease: ☐ Count toward next increase threshold ☐ Standard treatment only Retroactive processing of late-reported decreases: ☐ Yes, per agency policy ☐ No Reporting deadline: ______ days	
6. Safe Harbor	Optional	Use Safe Harbor? ☐ Yes ☐ No *If used, HUD limits Safe Harbor to annual reexamination only.* Accepted qualifying means-tested federal programs: ____________ If multiple determinations are presented: ☐ Most recent ☐ Other: _____ Supervisory/approval required before acceptance: ☐ Yes ☐ No	

Section	Status	PHA Selection	Notes / Local Details
7. De Minimis Correction Process	**Required Now (baseline); process is a PHA choice**	*HUD baseline (not a PHA choice): errors of no more than $30/month ($360/year) are de minimis; overcharges are always corrected retroactively; a family is never required to repay an agency-caused undercharge.* Internal review/classification process — select ONE: ☐ Supervisor/QC review ☐ Trained-staff checklist ☐ Compliance/executive review before repayment or reimbursement Approval authority: ___________	________________________ ________________________ ________________________ ________________________
8. Annual HOTMA Update & Version-Control Process	***VVS Recommended***	☐ Assign review to Compliance Officer/designee ☐ Administratively-updated threshold addendum ☐ Require Board approval each year ☐ Cross-functional team review Review timing: ___________	________________________ ________________________ ________________________
9. Verification, Documentation & EIV	**Mixed**	*Select all applicable controls (not mutually exclusive):* ☐ Highest-available verification first ☐ Tenant-provided documents when reliable ☐ Self-certification where HUD permits ☐ Third-party verification when information conflicts/is incomplete ☐ Supervisory/QC escalation **EIV Income Report at interim reexaminations** (fully PHA-discretionary — no HUD deadline requires stopping): ☐ Continue using ☐ Discontinue using	________________________ ________________________ ________________________ ________________________ ________________________
10. Deductions & Hardship Relief	**Mixed**	Hardship definition (local standard): ___________ Extend relief beyond the initial 90-day period: ☐ Yes ☐ No If yes — additional 90-day periods: ______ ☐ No maximum (PHA discretion) Childcare hardship standard: ___________ Additional permissive deductions adopted: ☐ Yes ☐ No — describe: ___________	________________________ ________________________ ________________________ ________________________ ________________________
11. Family Notices	**Required Now (baseline); details are local**	*HUD baseline (not a PHA choice): written notice is required whenever a HOTMA-related decision affects eligibility, rent, assistance, or required family action.* Notice timeframe: ______ days Delivery method: ___________ Hearing/grievance contact: ___________ Responsible position: ___________ LEP/translation process: ___________ Reasonable accommodation language: ☐ Standard ☐ Customized	________________________ ________________________ ________________________ ________________________
12. HUD-9886-A / Revocation of Consent	**Required Now (transitioned since Feb. 1, 2025)**	Confirm agency has transitioned to Form HUD-9886-A: ☐ Yes ☐ In progress Local policy on the consequences of revoking consent, to be communicated to families: ___________ *HUD baseline: failing to sign the consent form may result in denial of eligibility or termination of assistance, or both.*	________________________ ________________________ ________________________ ________________________

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

Use this as a final review tool: Before adopting final ACOP or Administrative Plan language, confirm the agency has made each required policy choice and inserted only the selected language in the correct section.

- ☐ New-admission asset enforcement applied without exception, plus the selected reexamination enforcement option (total non-enforcement, total enforcement, or limited enforcement/cure) and any exception policy, notice, hearing, or grievance process.
- ☐ Real property suitability standards, exceptions, proof required, and approval authority.
- ☐ Asset self-certification use at admission and reexamination, form, frequency, third-party verification triggers, and close-to-threshold review.
- ☐ Safe Harbor use, accepted programs, approval authority, and documentation required.
- ☐ Interim reexamination reporting deadlines, the PHA-selected decrease threshold, effective dates, and "not processed" file note standard.
- ☐ Verification hierarchy, document age limits, tenant declaration standards, EIV-at-interim policy, and file note expectations.
- ☐ Hardship relief request process, approval, duration (including any additional 90-day periods), recertification, expiration, and notice language.
- ☐ De minimis error review, mandatory correction rule, reimbursement/repayment, and internal review process.
- ☐ Annual threshold review responsibility, timing, update method, staff notice, and forms/software alignment.
- ☐ HUD-9886-A in current use, and local policy on the consequences of revocation communicated to families.
- ☐ Each section's Implementation Status confirmed against current HUD guidance (Required Now / Conditional / Optional / VVS Recommended) before treating a readiness item as an active rule.

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