VIRGINIA VILES SERVICES, LLC

HOTMA

POLICY READINESS GUIDE

ACOP • ADMINISTRATIVE PLAN • TENANT SELECTION PLAN

A Practical Reference for Public Housing Agencies and Multifamily Owners



CLEAR GUIDANCE
Navigate requirements with confidence.

STRONGER COMPLIANCE
Align policy with HUD standards.

CONSISTENT DECISIONS
Support staff and residents.

BETTER OUTCOMES
Build stronger communities.

PRACTICAL POLICY | STRONG DOCUMENTATION | EFFECTIVE OPERATIONS | MONITORING READY

Strategic Partnerships. Lasting Impact. Better Communities.

HOTMA Policy Readiness Guide

ACOP • Administrative Plan • Tenant Selection Plan

A Practical Reference for Public Housing, HCV, PBV, RAD and MTW Agencies

Prepared by Virginia Viles Services, LLC

"Helping agencies turn HUD requirements into practical policy."

Version: October 2026 (Revision 2: program applicability and MTW/RAD dates) | Updated for PIH 2026-09, PIH 2026-15, and HUD's September 29, 2026 HOTMA Implementation FAQs | Replaces all earlier editions
Always verify current HUD regulations, HUD Notices, and your agency's approved ACOP/Administrative Plan before adopting any language in this guide.

This workbook-style guide helps you update your policy one decision at a time. For every HOTMA topic it tells you three things: **what HUD already requires** (so you do not have to "choose" it), **what you actually get to decide** (written as a plain question), and **what the policy should say** once you decide. It is an add-on reference and does not replace HUD regulations, HUD Notices, or Board-approved policy.

Have questions? We're here to help.
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Why this matters now: HOTMA is not simply a form update. It affects how agencies define income, evaluate assets, verify information, calculate rent, process interim reexaminations, apply deductions, issue notices, and document decisions. HUD will enforce most remaining Sections 102 and 104 provisions for Form HUD-50058 transactions effective **January 1, 2027**, so policy decisions need to be made and documented now.

How to read the labels in this guide

HUD REQUIRED	**No local choice.** HUD already decided. Insert the language as written. You only fill in dates, titles, or form names. There is nothing to "select" on the checklist.
YOUR CHOICE	**You must decide.** HUD allows more than one approach and expects your policy to state which one you picked. Each option explains when it fits best.
OPTIONAL	**You may adopt it, but you do not have to.** HUD does not require it. If you leave it out, your policy is still compliant.
VVS RECOMMENDED	**Good practice from Virginia Viles Services.** Not a HUD rule. Use it if it helps staff stay consistent and file-ready.

Who this applies to: The choices in this guide come from HUD's list of discretionary policies for Public Housing, Housing Choice Voucher (HCV), and Project-Based Voucher (PBV) agencies, including PBV units converted under RAD. Every section shows which programs it covers. The next page explains how each program is treated and which date applies to it. Multifamily owners (including RAD PBRA owners) use HUD's Multifamily notices (H 2023-10 and H 2025-07) and should confirm which items apply to them.

Which programs does this Guide cover, and when does each one comply?

HOTMA does not reach every program on the same day. Find your program below. The **chips under each section heading** tell you where a section is the same for every program and where a citation or document name differs.

Program	Your policy document	HOTMA Sections 102 and 104 date, and what to know
Public Housing	ACOP	**Jan. 1, 2027.** HUD enforces the remaining provisions for Form HUD-50058 transactions effective on or after this date (PIH 2026-15).
Housing Choice Voucher (HCV)	Administrative Plan	**Jan. 1, 2027.** Same notice (PIH 2026-15).
Project-Based Voucher (PBV) and Mod Rehab	Administrative Plan (PBV chapter)	**Jan. 1, 2027.** PIH 2026-15 names PBV and Moderate Rehabilitation as covered programs.
RAD: public housing converted to PBV	RAD PBV chapter of the Administrative Plan	**Follows the PBV rules (our reading).** The RAD Notice applies the PBV rules in 24 CFR part 983 (Rev-4, Sec. 1.2.A). Its HOTMA section (H-2025-01 / PIH-2025-03, Sec. XI) makes conforming changes for HUD's HOTMA Voucher Final Rule (effective June 6, 2024) and does not address the Section 102/104 income and asset rules. PIH 2024-38 and 2026-15 cover PBV but do not mention RAD, so confirm your date with your HUD RAD transaction manager.
RAD: converted to PBRA (owner-operated)	Owner's Tenant Selection Plan and house rules	**Multifamily rules apply, not this Guide's PHA choices.** The RAD Notice applies the PBRA rules (24 CFR part 880; Rev-4, Sec. 1.2.B). HUD's Multifamily Notice H 2025-07 (published Dec. 30, 2025) sets **Jan. 1, 2027** for PBRA. Confirm how it applies to your project with your HUD Multifamily contact.
Moving to Work (MTW): original ("initial") agencies	ACOP / Administrative Plan *and* MTW Plan	DATE PENDING Exempt from Jan. 1, 2027. HUD says the date is "to be communicated by HUD" and is exploring alternative instructions so initial MTW agencies can submit HOTMA-compliant data to IMS/PIC (PIH 2026-15).
Moving to Work: Expansion agencies	ACOP / Administrative Plan *and* MTW Plan	DATE PENDING Exempt from Jan. 1, 2027. HUD is updating IMS/PIC to accept the 2024 Form HUD-50058 MTW Expansion. The date will be announced once system development is complete (PIH 2026-15).
Agencies that use only HUD's Family Reporting Software (FRS)	ACOP / Administrative Plan	DATE PENDING Exempt from Jan. 1, 2027 if the agency was exclusively using FRS on May 14, 2026. HUD will replace FRS with a web-based application that creates the 2024 Form HUD-50058 and will announce the date.

Three things MTW agencies often miss: (1) The MTW exemption is **agency-wide**. HUD's Sept. 29, 2026 FAQ (Q1) says an MTW agency that applies MTW flexibilities to only one program is still not subject to the Jan. 1, 2027 date for *any* of its programs. (2) The three earlier dates (Jan. 1, 2024 EID enrollment; Feb. 1, 2025 Form HUD-9886-A; July 1, 2025 income definitions and de minimis errors) apply to **all** PHAs, MTW included. (3) Where your approved MTW Plan waives a rent or reexamination rule, your waiver controls for that rule. Confirm with your HUD MTW office which HOTMA provisions apply to you until HUD announces your date.

Our recommendation for MTW, FRS, and RAD agencies: Adopt the policy language now anyway. A pending date is not a reason to wait. Your policy will be ready the day HUD announces the date, and the choices in this Guide (assets, interim rules, hardship, Safe Harbor) take the same decisions from your Board whenever the date arrives.

Where the programs differ

Topic	Public Housing	HCV, PBV, RAD PBV	MTW agencies
Policy document	ACOP	Administrative Plan	Either, plus your MTW Plan
Asset self-certification: 3-year full verification	24 CFR 960.259(c)(2)	24 CFR 982.516(a)(3)	Same rule unless your MTW Plan changes it
Interim reexaminations	24 CFR 960.257	24 CFR 982.516(c)	Check your alternate reexamination waivers
Review of adverse decisions	Applicant informal hearing; resident grievance procedure	Applicant informal review; participant informal hearing	Follow your approved MTW policies
Form HUD-50058	2024 Form HUD-50058	2024 Form HUD-50058	MTW or MTW Expansion version of the form, date pending
Income, assets, Safe Harbor, de minimis, deductions, hardship, consent	Same HUD rules and the same choices for every program above (24 CFR 5.609, 5.611, 5.618, 5.230, 5.232).		

Your decision map: what you actually have to decide

Use this map to see which sections need a decision from your Board or Executive Director and which are simply required language.

#	Topic	Type	What you decide
1	Governing authority	HUD REQUIRED	Nothing to choose. Fill in the date your HOTMA provisions take effect.
2	Annual income	HUD REQUIRED	Nothing to choose. HUD sets how income is counted for each type of exam.
3	Assets and real property	HUD REQUIRED YOUR CHOICE	Admission rules are required. You decide (a) how you treat families who go over the asset limit *after* they are already assisted, and (b) how you define a "geographic hardship" for real property.
4	Asset self-certification	YOUR CHOICE	Whether to accept a signed asset statement at admission, and separately at annual reexamination.
5	Interim reexaminations	HUD REQUIRED YOUR CHOICE OPTIONAL	The 10% increase rule and household-change rule are fixed. You pick the decrease percentage (10% or lower), the reporting deadline, and whether to adopt three optional rules.

#	Topic	Type	What you decide
6	Safe Harbor	OPTIONAL	Whether to use it at all. If yes: which programs, when, and how to handle more than one determination.
7	De minimis errors	HUD REQUIRED YOUR CHOICE	The correction rule is fixed. You decide how you credit or repay an overcharge.
8	Annual threshold review	VVS RECOMMENDED	Who updates the dollar amounts each year. HUD requires current-year amounts, but not any particular internal process.
9	Verification and documentation	HUD REQUIRED YOUR CHOICE	HUD's verification approach is fixed. You decide local procedures and whether to use EIV at interim reexaminations.
10	Deductions and hardship relief	HUD REQUIRED YOUR CHOICE OPTIONAL	Deduction amounts are fixed. You write your hardship definition and extension rules, and may add extra deductions.
11	Notices to families	HUD REQUIRED	Nothing to choose. Add local timeframes and contacts.
12	HUD-9886-A and revocation of consent	HUD REQUIRED YOUR CHOICE	The form is required. You decide what happens when a family revokes consent.
13	Final cross-check	VVS RECOMMENDED	Confirm every decision shows up in forms, software, notices, and file notes.

Where HOTMA stands right now

HUD has moved some dates and tightened the interim rules during 2026. Use this table to separate what is already in effect from what is coming. Check the notices themselves for the final word.

Date	What happens	Source
Jan. 1, 2024	No new enrollment of families in the Earned Income Disregard (EID).	PIH 2024-38
Feb. 1, 2025	Form HUD-9886-A must be in use.	PIH 2024-38; 2026-15
July 1, 2025	New income exclusions and definitions (24 CFR 5.609(b) and 5.603) and the de minimis error rules apply.	PIH 2024-38; 2026-15
Apr. 13, 2026	HUD revises its interim reexamination standard: every added or removed household member now requires an interim reexamination (a 0% threshold).	PIH 2026-09 / H 2026-05
May 14, 2026	HUD sets **January 1, 2027** as the enforcement date for the remaining Section 102 and 104 provisions: net family assets and the asset limitation, imputed asset income, asset self-certification, deductions and hardship relief, Safe Harbor, and the interim reexamination procedures.	PIH 2026-15

Date	What happens	Source
Sept. 25–29, 2026	HUD updates its HOTMA page: revised Form HUD-50058 Family Report versions (standard, MTW, and MTW Expansion) and new HOTMA Implementation FAQs for PHAs. The FAQs confirm the MTW and FRS exemptions, explain how to process multiple simultaneous income changes, and note that a pending rule will change the phased-in hardship eligibility date.	HUD HOTMA page; FAQs
Sept. 2026	Agencies that start annual reexaminations 120 days before the effective date should already be collecting and verifying income under their HOTMA policies for January 1, 2027 effective dates.	PIH 2026-15
Jan. 1, 2027	All Form HUD-50058 transactions effective on or after this date must be HOTMA-compliant for most agencies. MTW and FRS-software agencies are exempt and their dates are still to be announced. Agencies may submit the 2024 Form HUD-50058 earlier if their software allows.	PIH 2026-15
To be announced	**MTW agencies (initial and Expansion) and FRS-only agencies.** HUD will communicate a compliance date once its systems are ready. RAD conversions follow the PBV or PBRA date described on the previous page.	PIH 2026-15

What this means for your policy: Adopt your HOTMA policy language now, set your policy effective date (Section 1), and make sure forms, software, and staff training are ready before January 1, 2027. Notice PIH 2026-15 does not prohibit an agency from implementing earlier. If your agency participates in MTW or uses FRS software, confirm your date with HUD.

1. Governing authority and HOTMA effective date

HUD REQUIRED

Programs: PUBLIC HOUSING | HCV | PBV | RAD PBV | MTW: DATE PENDING

Public Housing: ACOP. HCV and PBV: Administrative Plan. RAD PBV: the RAD PBV chapter of the Administrative Plan. MTW: your MTW Plan also controls.

Place in: ACOP: Introduction, Fair Housing/General Policy, or Eligibility chapter. Administrative Plan: Introduction or General Administrative Policies. TSP: Purpose, Applicability, or Eligibility section.

> **HUD REQUIRED — no local choice:** Every ACOP, Administrative Plan, and TSP must identify its governing authority, recognize current HUD guidance, and make clear that HUD rules control when they conflict with local policy.

Insert this language: The agency will administer income, asset, eligibility, verification, and rent determination requirements in accordance with applicable HUD regulations, HUD Notices, HUD guidance, and this policy. HUD requirements control over this policy if they conflict. If HUD delays, supersedes, or modifies any HOTMA requirement, the agency will follow the most current HUD-issued compliance guidance. The agency's HOTMA provisions are effective _____ [insert date]. Staff must document the applicable rule, effective date, threshold amount, verification used, and decision basis in the applicant, resident, or participant file.

Add your agency details: The date your HOTMA provisions take effect (for most agencies, no later than January 1, 2027), your Board approval date, and any software transition language. *This is a fill-in, not a choice between "standard" and "custom" language.*

2. Annual income determination

HUD REQUIRED

Programs: PUBLIC HOUSING | HCV | PBV | RAD PBV | MTW: DATE PENDING

Same HUD rule for every program: 24 CFR 5.609.

Place in: ACOP and Administrative Plan: Income and Rent Determination chapter. TSP: Income Eligibility, Income Determination, or Certification Procedures section.

> **HUD REQUIRED — no local choice:** Policies must apply HUD's definition of annual income, identify included and excluded income, and document the basis for each decision. **HUD also sets the time period used for each type of examination, so there is no local "income method" to select** (24 CFR 5.609(c)).

Insert this language: Annual income will be determined using HUD's definition of annual income and the applicable income exclusions. For admission and interim reexaminations, the agency will estimate the family's income for the upcoming 12-month period. For annual reexaminations, the agency will determine the family's income for the previous 12-month period, adjusted for any interim redeterminations and for changes not already accounted for. Staff will review all reported income sources, decide whether each is included or excluded, and retain documentation of the income source, verification used, the decision, and the basis for any exclusion. Where an exclusion or deduction has a HUD-published annual amount, the agency will apply the amount in effect on the effective date of the transaction, as adjusted annually by HUD in accordance with CPI-W.

Add your agency details: Nothing to choose. Dollar amounts for staff reference are in the Threshold Table at the back of this guide, not in policy text, so they do not go out of date.

3. Assets, the asset limitation, and real property

HUD REQUIRED | YOUR CHOICE

Programs: PUBLIC HOUSING | HCV | PBV | RAD PBV | MTW: DATE PENDING

Same HUD rule for every program: 24 CFR 5.618.

Place in: ACOP/Admin Plan: Eligibility, Continued Occupancy, Assets, Denial/Termination, Notices, and Grievance/Informal Hearing. TSP: Eligibility Criteria, Assets, Rejection Criteria, Continued Eligibility, and Appeal/Review Procedures.

Part A — New admissions

> **HUD REQUIRED — no local choice:** An applicant family must be denied admission if its net family assets exceed the HUD asset limitation, or if any family member owns real property that is suitable for occupancy by the family as a residence and that the family has the legal right and authority to sell. HUD gives agencies **no discretion** over this at admission. HUD recognizes exceptions, including property receiving homeownership assistance, property jointly owned with someone outside the household who lives there, a family member who is a survivor of domestic violence, dating violence, sexual assault, or stalking, and property the family is actively offering for sale (24 CFR 5.618).

Insert this language: The agency will deny admission to an applicant family whose net family assets exceed the HUD-published asset limitation in effect on the effective date of the determination, as adjusted annually by HUD in accordance with CPI-W, or in which any member has a present ownership interest in, a legal right to reside in, and the effective legal authority to sell real property suitable for occupancy by the family as a residence, unless a HUD-recognized exception applies. The file must document the asset determination, the threshold and calendar year used, the suitability and exception review, the notice issued, and the family's review or hearing rights.

Part B — Defining "geographic hardship" for real property

YOUR CHOICE — pick one: HUD lets you set parameters for when the location of a family's property makes it unsuitable (for example, too far from work, school, or needed services). Choose how specific to be.

☐ **Option 1: Set written parameters.**

Choose this if: you want every staff member to apply the same standard (recommended for consistency).

Insert this language: A property is not suitable for occupancy by the family because of geographic location when [insert agency standard, such as a one-way commute of more than ___ miles or ___ minutes to the household's place of work, school, or essential care or services]. Staff must document the facts supporting the determination.

☐ **Option 2: Decide case by case.**

Choose this if: your area is small and you prefer to look at each family's facts.

Insert this language: The agency will decide whether a property's location creates a geographic hardship case by case, based on the family's documented circumstances, and will record the facts and reasoning in the file.

Part C — Existing families who go over the asset limit at reexamination

YOUR CHOICE — pick one of Options 1–3: This part **does not apply to new admissions**. When a family already receiving assistance is found over the asset limit at an annual or interim reexamination, HUD lets your agency choose how strictly to act. HUD's list of discretionary policies describes these approaches. (An earlier version of this guide listed options such as "defer until system readiness." That is not a HUD-defined option, and timing is now handled by the January 1, 2027 enforcement date.)

☐ **Option 1: Total non-enforcement.**

Choose this if: you do not want to end assistance for existing families solely because of assets.

Insert this language: The agency will not enforce the HOTMA asset limitation against families already receiving assistance at annual or interim reexamination. Staff must still determine and document the family's net family assets, the threshold and calendar year used, and that the family was reviewed under this non-enforcement policy.

☐ **Option 2: Total enforcement.**

Choose this if: you want to apply the asset limitation to every existing family. HUD allows you to delay termination proceedings for up to 6 months after the reexamination effective date.

Insert this language: The agency will enforce the HOTMA asset limitation at annual and interim reexamination. Where a family is over the limit, the agency will provide written notice and may delay termination proceedings for up to [insert 0–6] months from the effective date of the reexamination. Staff must document the asset determination, threshold and year used, notice, and the family's review, hearing, or grievance rights.

☐ **Option 3: Limited enforcement with a cure period.**

Choose this if: you want to give families a fair chance to come back under the limit before assistance ends (most common middle ground).

Insert this language: The agency will not enforce the asset limitation for up to [insert 1–6] months after the reexamination. During this period the family may cure the noncompliance (for example, by reducing assets below the limit or disposing of real property). If the family does not cure within the stated period, the agency will begin termination. The cure period will never delay termination beyond 6 months. The written notice must state the issue, the HUD-published limit and year used, the cure deadline, the documentation required, and the family's review, hearing, or grievance rights.

OPTIONAL — add to Option 1, 2 or 3 if you wish: Exception policy. HUD lets you write exceptions for certain types of families, considering factors such as age, disability, income, availability of other housing, and access to supportive services. An exception policy must comply with fair housing laws, must describe the excepted families and how enforcement works for them (non-enforcement, or limited enforcement with a cure period of up to 6 months), and cannot delay termination beyond 6 months if the issue is not cured. It can be combined with limited enforcement.

VVS RECOMMENDED: Require a supervisor or Compliance Officer to review the file before any denial, termination, or non-continuation notice based on assets. This is an internal control, not a HUD requirement. Suggested language: *"No adverse action based on the HOTMA asset limitation will be issued until the file has been reviewed and approved by the Compliance Officer, supervisor, or designee."*

Add your agency details: Cure period length, approval title, notice timeframe, hearing/grievance language, software field, and file note location.

4. Self-certification of assets

YOUR CHOICE

Programs: PUBLIC HOUSING | HCV | PBV | RAD PBV | MTW: DATE PENDING

Public Housing: 24 CFR 960.259(c)(2). HCV, PBV and RAD PBV: 24 CFR 982.516(a)(3).

Place in: ACOP/Admin Plan: Verification chapter, Income and Assets, or Annual Reexamination procedures. TSP: Verification Procedures or Assets section.

HUD REQUIRED — no local choice: Staff must always determine the family's total net family assets and the actual income those assets earn. When net family assets are at or below the HUD self-certification threshold, HUD *allows* (but does not require) the agency to accept the family's signed statement instead of third-party documents. **If you accept self-certification at reexamination, you must obtain third-party verification of all family assets at least every 3 years.** If you do not accept self-certification, you must verify assets each time (24 CFR 960.259(c) for Public Housing; 24 CFR 982.516(a) for HCV; 24 CFR 5.618).

YOUR CHOICE — answer two separate questions: Your policy must state your answer for admission and for reexamination. They are independent of each other.

Question A — At admission, will we accept a signed asset statement?

☐ **Yes, at admission.**

Choose this if: you want to speed up lease-up and reduce the burden on applicants.

Insert this language: At admission, when the family's total net family assets are at or below the HUD-published self-certification threshold in effect on the effective date, as adjusted annually by HUD, the agency will accept the family's signed declaration of net family assets and anticipated asset income in lieu of third-party verification. The file must include the signed declaration, the asset total, and the threshold and year used.

☐ **No, verify at admission.**

Choose this if: you prefer documented proof of assets before admitting a family.

Insert this language: At admission, the agency will obtain third-party verification of the family's assets and asset income and will not accept self-certification in its place.

Question B — At annual reexamination, will we accept a signed asset statement?

☐ **Yes, at annual reexamination.**

Choose this if: most of your families have low assets and you want a lighter annual workload. Remember the 3-year full-verification rule.

Insert this language: At annual reexamination, when the family's total net family assets are at or below the HUD-published self-certification threshold, the agency will accept the family's signed declaration. The agency will obtain third-party verification of all family assets at least once every three years.

☐ **No, verify at annual reexamination.**

Choose this if: you want assets documented every year.

Insert this language: At annual reexamination, the agency will obtain third-party verification of the family's assets and asset income and will not accept self-certification in its place.

VVS RECOMMENDED: Whichever you choose, require extra verification when information conflicts, is missing, looks questionable, or assets are close to the threshold. Suggested language: *"Staff must obtain additional verification before accepting a self-certification when the file contains inconsistent or missing information, suspected undisclosed assets, or asset totals close to the HUD threshold."*

Add your agency details: The name of your self-certification form (HUD requires the form to collect real property ownership, legal right to reside, and legal authority to sell where state or local law applies), who performs the reasonableness review, and where the file note goes.

5. Interim reexaminations

HUD REQUIRED | YOUR CHOICE | OPTIONAL

Programs: PUBLIC HOUSING | HCV | PBV | RAD PBV | MTW: DATE PENDING

Public Housing: 24 CFR 960.257. HCV, PBV and RAD PBV: 24 CFR 982.516(c). MTW: check your approved reexamination waivers.

Place in: ACOP/Admin Plan: Interim Reexaminations, Family Obligations, Reporting Changes, or Rent Determination. TSP: Interim Certification or Reporting Changes section.

HUD REQUIRED — no local choice:

- **Income increases:** conduct an interim reexamination when annual adjusted income increases by **10% or more**. The 10% figure is set by HUD. You cannot choose a lower number or a dollar amount instead of a percentage.
- **Household changes:** conduct an interim reexamination whenever a household member is added or removed, including family members, foster adults, foster children, and live-in aides, **whether income goes up, down, or stays the same** (a 0% threshold). This was added by HUD Notice PIH 2026-09 / H 2026-05 in April 2026.
- **Earned income:** increases in earned income are not counted toward the 10% threshold, except in the situation in Decision 3 below.
- **Reporting:** your policy must say which changes families report and the deadline for reporting timely.

Insert this language: The agency will conduct an interim reexamination when the family's annual adjusted income is estimated to increase by 10% or more, and whenever a household member (including a family member, foster adult, foster child, or live-in aide) is added or removed, regardless of the effect on income. Reported changes that do not meet a threshold will be documented in the file as not processed, with the reason.

YOUR CHOICE — Decision 1: How big a decrease triggers an interim? HUD lets you decline an interim reexamination for an income decrease smaller than 10% of annual adjusted income, **or a lower percentage you pick**. You must write the percentage in your policy (a dollar amount is not allowed).

☐ **Option 1: Use 10%.**

Choose this if: you want fewer interims and a simple standard.

Insert this language: The agency will conduct an interim reexamination for a decrease in annual adjusted income when the decrease is estimated to be 10% or more. [Optional rounding rule: a calculated percentage of ___% or higher will be treated as 10%.]

☐ **Option 2: Use a lower percentage (such as 5%).**

Choose this if: you want families to get rent relief sooner and can handle the added workload.

Insert this language: The agency will conduct an interim reexamination for a decrease in annual adjusted income when the decrease is estimated to be [insert 1–9]% or more. Reported decreases below this percentage will be documented in the file as not processed.

YOUR CHOICE — Decision 2: Reporting deadline: How many days do families have to report a change for it to be "timely"? Write the number of days, such as _____ days from the date of the change. HUD does not set it for you, but your policy must state it.

Insert this language: Families must report changes in household composition and in income or deductions that meet the thresholds in this policy within [insert number] days of the change.

OPTIONAL — Decision 3: Earned income after an interim decrease: If a family already received an interim decrease since its last annual reexamination, HUD lets you *choose* whether a later increase in earned income can count toward the 10% threshold. If you choose to count it, you must review the EIV New Hires report at least quarterly for the rest of that reexamination period. If you choose not to count it, you do not need to use the New Hires report between annual reexaminations. **If a family reports several changes at once** (for example, one income source ends and a new job starts), HUD's Sept. 29, 2026 FAQ (Q2) explains that how you process them depends on this decision and on whether you adopt Decision 4. Write down whether you will process the changes separately or together.

☐ **Count it**

Choose this if: you want rent to rise when earnings rebound after a decrease.

Insert this language: After a family receives an interim decrease, the agency will consider later increases in earned income when applying the 10% threshold, and will review the EIV New Hires report at least quarterly for the remainder of the reexamination period.

☐ **Do not count it**

Choose this if: you want a simpler process for families recovering from a decrease.

Insert this language: The agency will not consider increases in earned income for the 10% threshold after an interim decrease, except as required by HUD.

OPTIONAL — Decision 4: Skip increases in the last 3 months: You may adopt a written policy not to conduct an interim for an income increase reported within 3 months of the next annual reexamination. Under PIH 2026-09, if you adopt this, household-member additions or removals in that same window can also be reported at the annual reexamination.

Insert this language only if you adopt this option: The agency will not conduct an interim reexamination for increases in annual adjusted income, or for household composition changes, reported during the last 3 months before the family's regular annual reexamination effective date. These changes will be addressed at the annual reexamination.

OPTIONAL — Decision 5: Retroactive rent decreases: You may adopt a policy that lets a decrease apply retroactively when the family reports late, for example because of extenuating circumstances. A retroactive decrease cannot take effect earlier than the later of (1) the first of the month after the actual decrease, or (2) the first of the month after the family's most recent income examination.

VVS RECOMMENDED: Write a file note for every reported change, including changes that do not lead to an interim, stating what was reported, when, the threshold reviewed, the decision, and whether a notice was sent.

6. Safe Harbor income determinations

OPTIONAL

Programs: PUBLIC HOUSING | HCV | PBV | RAD PBV | MTW: DATE PENDING

Same HUD rule for every program: 24 CFR 5.609(c)(3).

Place in: ACOP/Admin Plan: Income Determination, Verification, or Annual Reexamination. TSP: Income Determination or Annual Certification Procedures section.

OPTIONAL — HUD does not require agencies to use Safe Harbor: Safe Harbor lets you use an income determination from another means-tested federal assistance program (such as TANF, Medicaid, SNAP, EITC, WIC, or other HUD-recognized programs) made within the previous 12 months, instead of recalculating income yourself. **If you do not want to use it, simply say so. You are fully compliant either way.**

HUD REQUIRED — if you choose to use it: You must obtain third-party verification from the other program that states the family size, the household members covered (which must match your household), and the annual income. If the information is unavailable or disputed, you calculate income the standard way (24 CFR 5.609(c)(3)).

YOUR CHOICE — only if you use Safe Harbor: Your policy must state (1) which programs you accept, (2) when you use it (admission, annual reexamination, interim, or any combination), and (3) what you do when a family has more than one determination. HUD's sample approach is to use the most recent determination, or, when determinations are within three months of each other, follow a priority order listed in the policy.

☐ **Option 1: Do not use Safe Harbor.**

Choose this if: your staff are not set up to track outside program determinations.

Insert this language: The agency will not use Safe Harbor income determinations. Staff will use the standard income verification procedures in this policy.

☐ **Option 2: Use Safe Harbor for listed programs.**

Choose this if: you want the time savings but with clear limits.

Insert this language: The agency will use Safe Harbor only for income determinations from [list programs, such as SNAP, Medicaid, TANF] made within the previous 12 months, and only at [admission / annual reexamination / interim reexamination / specify]. Staff must verify the program, date of determination, family size and members covered, and annual income, and must confirm the information still represents the family's current circumstances. When a family has more than one qualifying determination, the agency will use [the most recent determination / specify priority order].

VVS RECOMMENDED: Require a supervisor's sign-off the first time Safe Harbor is used on a file, and set a document age limit, so staff apply it consistently.

7. De minimis errors and file correction

HUD REQUIRED | YOUR CHOICE

Programs: PUBLIC HOUSING | HCV | PBV | RAD PBV | MTW: DATE PENDING

Same HUD rule for every program: 24 CFR 5.609(c)(4).

Place in: ACOP/Admin Plan: Rent Calculation, Quality Control, Repayment Agreements, or Error Correction. TSP: Certification Corrections or File Corrections section.

HUD REQUIRED — no local choice: A **de minimis error** is an income determination that is off by no more than **$30 per month ($360 per year)** in adjusted income per family. When an error overcharged the family's rent, the agency must credit or repay the family. When the agency's error undercharged the family, **the family can never be required to repay it** (24 CFR 5.609(c)(4)). The earlier version of this guide listed "correct overcharges retroactively and undercharges prospectively" as one choice among four. It is actually the rule, so it is no longer a choice.

Insert this language: When the agency's income determination deviates from the correct determination by no more than $30 per month ($360 per year) in adjusted income, the error is de minimis. If the error caused the family to be overcharged, the agency will credit or repay the family the overpayment retroactive to the effective date of the error, regardless of the dollar amount. The agency will not require a family to repay an amount the family was undercharged because of an agency error. Staff must document the error, the correction, and the notice to the family.

YOUR CHOICE — how will you pay back an overcharge? HUD requires the credit or repayment but lets you decide the method.

☐ **Credit against future rent.**

Choose this if: the family is still receiving assistance and the amount is modest.

Insert this language: The agency will apply the amount owed to the family as a credit against the family's future rent until it is fully applied. If the family's assistance ends before the credit is used, the agency will pay the remaining balance to the family.

☐ **Refund or HAP adjustment.**

Choose this if: you prefer to resolve it at once.

Insert this language: The agency will refund the amount owed to the family within [insert number] days of identifying the error or, for HCV, adjust the housing assistance payment and the family's share as appropriate.

VVS RECOMMENDED — internal review (pick any): These are not HUD requirements. They help prevent mistakes: (a) a supervisor or QC reviewer confirms an error is de minimis before it is classified, (b) trained staff classify errors using a checklist, with quality-control sampling, and (c) the Executive Director or designee approves repayments or credits above a dollar amount you set.

Add your agency details: Reviewer title, checklist name, accounting procedure, notice template, and QC sampling method. Errors larger than $30 per month are not de minimis and follow your agency's regular error-correction and repayment policy.

8. Annual threshold review and policy maintenance

VVS RECOMMENDED

Programs: PUBLIC HOUSING | HCV | PBV | RAD PBV | MTW: DATE PENDING

Internal practice. Applies to every program.

Place in: ACOP/Admin Plan/TSP: General Administration, Policy Maintenance, Quality Control, Annual Review, or Appendices.

HUD REQUIRED — no local choice: HUD adjusts HOTMA dollar amounts and the passbook rate each year for inflation, and you must use the current-year amounts. **HUD does not tell agencies how to track the updates internally.** The "option" below is a VVS-recommended administrative control, not a HUD policy decision.

VVS RECOMMENDED — choose the process that fits your agency: Whichever process you pick, write it into the policy so someone is accountable every year.

☐ **Option 1: Compliance Officer reviews.**

Choose this if: you have one clearly responsible person.

Insert this language: The Compliance Officer or designee will review HUD's annual HOTMA threshold updates each August or September and confirm the amounts effective the following January 1. The review will be documented and shared with affected staff before implementation.

☐ **Option 2: Update an addendum administratively.**

Choose this if: your policy says "as adjusted annually by HUD," and you do not want to go back to the Board each year.

Insert this language: Because this policy uses "as adjusted annually by HUD" as the controlling standard, the agency may update the current-year HOTMA threshold table or addendum administratively without full Board amendment, unless Board action is required by local policy.

☐ **Option 3: Board approves each update.**

Choose this if: your Board prefers to approve every change.

Insert this language: The agency will present each annual HOTMA threshold update to the Board for approval before revising staff tools, forms, software settings, or public-facing references. Staff will continue to use the currently approved amounts until the update is effective.

☐ **Option 4: Cross-functional team.**

Choose this if: policy, software, forms, and notices are handled by different departments.

Insert this language: Annual HOTMA threshold updates will be reviewed by a team that includes policy, compliance, operations, software, forms, notices, and quality-control staff, who will confirm that policy language, staff tools, forms, system settings, and file templates are aligned before January 1.

Add your agency details: Responsible position, review deadline, staff notice method, and quality-control confirmation step.

9. Verification and file documentation

HUD REQUIRED | YOUR CHOICE

Programs: PUBLIC HOUSING | HCV | PBV | RAD PBV | MTW: DATE PENDING

Same HUD rules for every program: 24 CFR 5.230 and 5.233 (EIV).

Place in: ACOP/Admin Plan: Verification chapter, Documentation Standards, or File Review. TSP: Verification Procedures or File Documentation section.

> **HUD REQUIRED — no local choice:** Your policy must include a verification approach that uses the highest-quality verification available, with lower methods used only when higher ones are unavailable and the reason is documented. Agencies must also use HUD's Enterprise Income Verification (EIV) system as required by 24 CFR 5.233. Every file must show how the decision was reached.

Insert this language: Staff will use the highest-quality HUD-acceptable verification method available and may move to a lower method only when a higher one is unavailable, not required, or not applicable to the transaction. The file must document the verification obtained and why it was sufficient. Tenant declarations may be accepted only where HUD permits and the file contains no conflicting, incomplete, or questionable information.

> **YOUR CHOICE — local procedures (select all that apply):** These fill in details HUD leaves to you. Pick every one you will adopt.

☐ **Document age limit.**

Choose this if: you want a clear rule for how old a document can be.

Insert this language: Tenant-provided documents must be dated within [insert number] days of the effective date of the transaction, and must be current, complete, legible, and consistent with other information in the file.

☐ **Third-party verification triggers.**

Choose this if: you want a clear rule for when staff must go beyond tenant documents.

Insert this language: Staff must obtain third-party verification when the file contains inconsistent or missing information, suspected fraud, questionable documentation, or a quality-control concern. The file must record the concern, the verification requested and received, and the final determination.

> **OPTIONAL — EIV at interim reexaminations:** HUD does **not** require agencies to use EIV at interim reexaminations, and HUD's February 2025 HOTMA FAQ confirms there is no deadline requiring you to stop. Choose whether your agency will keep using it.

☐ **Use EIV at interims.**

Choose this if: you want an extra check on reported changes.

Insert this language: Staff will review the EIV Income Report (and, where the policy counts earned income increases after an interim decrease, the New Hires Report) when processing interim reexaminations, in addition to required EIV reviews at annual reexamination.

☐ **Do not use EIV at interims.**

Choose this if: you want to limit interim workload.

Insert this language: The agency will not use EIV when processing interim reexaminations, except where HUD requires. EIV will continue to be used at admission and annual reexamination as HUD requires.

Add your agency details: Preferred verification order, escalation process, EIV procedures, acceptable tenant documents, and file note wording.

10. Deductions and hardship relief

HUD REQUIRED | YOUR CHOICE | OPTIONAL

Programs: PUBLIC HOUSING | HCV | PBV | RAD PBV | MTW: DATE PENDING

Same HUD rule for every program: 24 CFR 5.611.

Place in: ACOP/Admin Plan: Adjusted Income, Deductions, Medical/Disability Expenses, Childcare Expenses, Hardship Relief, Notices, or Grievance/Informal Hearing. TSP: Rent Calculation, Hardship Relief, or Appeal Procedures.

HUD REQUIRED — no local choice:

- **Standard deductions:** the dependent deduction and the elderly/disabled household deduction. HUD sets and adjusts the amounts each year (see the Threshold Table).
- **Medical and attendant care expenses:** the deductible portion is the amount above **10%** of annual income. Families who were already receiving this deduction get **phased-in relief**: above 5% for the first 12 months after their first reexamination under the new rules, above 7.5% for months 13–24, then above 10%. A family that chooses general hardship relief ends its phased-in relief. **Who qualifies is changing.** The regulation (24 CFR 5.611(c)(1)(i)) still says families receiving the deduction on January 1, 2024. HUD's Sept. 29, 2026 FAQ (Q3) says HUD is finalizing a rule that moves that eligibility date to the *earlier of* the date the agency implements the hardship relief or the date set in the HUD Notice enforcing compliance. Families receiving the deduction at their most recent income review before that date would qualify. Watch the Federal Register and update your policy when the final rule publishes.
- **Hardship verification:** for a childcare hardship, the agency must obtain third-party verification of the family's inability to pay rent, or document why it is unavailable, and must try to verify before the 90-day hardship period ends.

(24 CFR 5.611)

YOUR CHOICE — write down how hardship relief works in your agency: HUD requires hardship procedures to be written in your policy, and leaves these details to you. Complete each item.

- **Definition.** What counts as a hardship for (a) health, medical, and attendant care expenses and (b) childcare expenses (including "inability to pay rent")?
- **Extensions.** The first hardship period is 90 days. Will you allow additional 90-day periods while the hardship continues, and if so, how many? HUD sets no maximum, so you can state "no maximum."
- **Request process.** Is a written request and documentation required?

Insert this language: A family may request a hardship exemption for [health and medical care and attendant care expenses / childcare expenses] when [insert agency definition of hardship]. The agency will grant relief for an initial period of 90 days. The agency [will / will not] extend relief for additional 90-day periods while the hardship continues, up to [insert number / no maximum] extensions. The family must submit [a written request and documentation / specify]. The agency will verify the hardship through third-party verification or document why it is unavailable, and will attempt verification before the 90-day period ends. Relief ends when the circumstances no longer apply or at the end of the approved period, whichever is earlier.

OPTIONAL — extra deductions: Public Housing and HCV agencies may adopt additional (permissive) deductions beyond HUD's. This has cost effects: Public Housing agencies lose related operating and capital fund increases, and HCV agencies need enough funding to cover the higher housing assistance payments. Skip this unless your finance team has reviewed the cost.

> **VVS RECOMMENDED:** Have a supervisor approve hardship decisions and send a written notice for every hardship approval, denial, extension, or ending, stating the decision, reason, dates, and the family's review or hearing rights.

Add your agency details: Form name, approval title, extension length, notice process, and coordination with reasonable accommodation.

11. Notices to families

HUD REQUIRED

Programs: PUBLIC HOUSING | HCV | PBV | RAD PBV | MTW: DATE PENDING

Public Housing: grievance procedure and applicant informal hearing. HCV, PBV and RAD PBV: informal review (applicants) and informal hearing (participants).

Place in: ACOP/Admin Plan: Notices, Informal Review/Hearing, Denial/Termination, or Rent Change. TSP: Applicant Notices, Rejection Notices, or Certification Notices.

> **HUD REQUIRED — no local choice:** Written notice is required whenever a HOTMA-related decision affects eligibility, rent, assistance, admission, continued occupancy, denial, termination, hardship relief, or a required family action.

Insert this language: The agency will provide written notice when a HOTMA-related determination affects eligibility, rent, assistance, admission, continued occupancy, denial, termination, hardship relief, or required family action. Notices must identify the decision, effective date, reason, household responsibility, documentation required, deadline to respond, and applicable review, hearing, or grievance rights.

Add your agency details: Local notice timeframes, hearing office contact information, reasonable accommodation language, and language-access (LEP) or translation procedures. *These are details to fill in, not alternative policies.*

12. Form HUD-9886-A and revoking consent

HUD REQUIRED | YOUR CHOICE

Programs: PUBLIC HOUSING | HCV | PBV | RAD PBV | MTW: DATE PENDING

Same HUD rules for every program: 24 CFR 5.230 and 5.232.

Place in: ACOP/Admin Plan: Verification, Privacy/Consent, or Family Obligations. TSP: Certification Procedures.

> **HUD REQUIRED — no local choice:** Agencies must use Form HUD-9886-A (required since February 1, 2025). A signed consent stays effective until the family's assistance is denied or terminated, or the family revokes it in writing. Families must sign consent for income reexaminations, including those for decreases. Your policy must explain what happens when a family revokes consent, and the agency must notify its local HUD office when a family revokes. Revocation blocks the agency's income and financial record requests and EIV access (24 CFR 5.230, 5.232).

YOUR CHOICE — what happens when a family revokes consent? Pick one: HUD lets you decide the consequence, and requires you to write it down.

☐ **Option 1: Revocation ends assistance or admission.**

Choose this if: you cannot complete income determinations without consent (the most common choice).

Insert this language: If an applicant or participant revokes consent, the agency will deny admission or terminate assistance, as applicable, because required verification cannot be completed. The agency will notify the local HUD office of the revocation.

☐ **Option 2: Deny new applicants, let current families continue until the next reexamination.**

Choose this if: you want to give existing families time to sign a new consent.

Insert this language: If an applicant revokes consent, the agency will deny admission. If a participant revokes consent, the family may continue to receive assistance until its next reexamination and must sign a new consent form by that date. The agency will notify the local HUD office of the revocation.

☐ **Option 3: Require a new consent by the next reexamination.**

Choose this if: you prefer not to terminate solely over the form.

Insert this language: If a family revokes consent, the family must sign a new consent form by its next reexamination. The agency will notify the local HUD office of the revocation.

13. Final policy-to-practice cross-check

VVS RECOMMENDED

Programs: PUBLIC HOUSING | HCV | PBV | RAD PBV | MTW: DATE PENDING

Applies to every program.

Place in: Use as a final review before Board approval and staff rollout.

Before adopting final ACOP, Administrative Plan, or TSP language, confirm that each decision you made is written into the policy **and** reflected in forms, software settings, notices, staff procedures, and file notes. If a choice is selected but not carried through, implementation is not complete.

- ☐ Governing authority language and the date your HOTMA provisions take effect.
- ☐ Asset limitation at admission, geographic hardship standard, and the selected approach for existing families (including any cure period or exception policy).
- ☐ Asset self-certification answers for admission and for annual reexamination, and the 3-year full-verification control.
- ☐ Interim reexamination rules: 10% increase rule, household-change rule, decrease percentage, reporting deadline, and any optional rules adopted.
- ☐ Safe Harbor decision (use or do not use) and, if used, programs, timing, and handling of multiple determinations.
- ☐ De minimis correction rule and the method for crediting or repaying overcharges.
- ☐ Annual threshold review responsibility and timing.
- ☐ Verification hierarchy, document age limit, EIV use at interims, and file note expectations.
- ☐ Hardship definitions, extensions, request process, deductions, and notice language.
- ☐ Form HUD-9886-A in use and the selected consequence of revoking consent.
- ☐ Notices include required decision, reason, response deadline, and review, hearing, or grievance rights.

- ☐ Your program(s) and date confirmed: Public Housing, HCV, PBV, RAD, MTW (initial or Expansion), or FRS-only, and the HOTMA date that applies to each.

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

Current-year HOTMA threshold table and HUD update timeline

How to use this table: Write policy as "as adjusted annually by HUD" and keep the dollar amounts here, in an appendix or addendum, for staff reference only. Do not make a dollar amount the permanent rule. Apply the amount that is in effect on the effective date of the transaction, and subject to your agency's HOTMA enforcement date.

Item	2026	2027 (effective Jan. 1, 2027)
Net family assets limitation (admission; reexamination if enforced)	$105,574	$109,797
Self-certification threshold / imputed asset income threshold / non-necessary personal property	$52,787	$54,898
HUD passbook savings rate	0.40%	0.38%
Dependent deduction	$500	$525
Elderly/disabled household deduction	$550	$575
Earned income of dependent full-time students (excess exclusion)	$500	$525
Adoption assistance payments exclusion	$500	$525
De minimis error (fixed, not adjusted)	$30 per month / $360 per year	

Source: HUD CY2027 inflation-adjusted values (HUD User) and prior-year HUD tables. These amounts apply only to agencies that are complying with HOTMA Sections 102 and 104 for the transaction. Until your agency's HOTMA effective date, continue to follow current HUD implementation guidance for deductions and assets.

Annual HUD update point	Policy and staff action
Late summer each year	HUD publishes the inflation-adjusted HOTMA amounts and passbook rate for the next calendar year.
By September 1	Confirm the published values, update staff tools, and prepare the addendum or table.
Before January 1	Replace the prior-year reference amounts with the new HUD values in your addendum, forms, and software.
January 1	New amounts take effect for applicable examinations, subject to your agency's HOTMA implementation status.

Recommended policy wording: The agency will apply the HUD-published [threshold name], currently $[amount] effective January 1, [year], as adjusted annually by HUD in accordance with the Consumer Price Index for Urban Wage Earners and Clerical Workers (CPI-W). "As adjusted annually by HUD" is the controlling standard; the parenthetical amount is a staff reference that must be updated when HUD publishes new values.

HOTMA quick reference cheat sheet

Topic	Remember
Income	Document every inclusion and exclusion. Admission and interim use the next 12 months; annual uses the previous 12 months.
Assets	Record the threshold used, calendar year, and verification method. Full third-party verification at least every 3 years if you accept self-certification at reexamination.
Interims	10% increase and every household change are fixed by HUD. Explain why an interim was or was not processed.
Safe Harbor	Optional. If used, document the source program, date, family size, and income.
Deductions	Verify eligibility, amount, calculation, and phased-in relief where it applies.
Notices	Always give written notice when a decision affects eligibility, rent, assistance, or a required family action.
File notes	Explain every decision so the file stands on its own.

Top 10 HOTMA policy mistakes

- Treating a HUD-required rule as a local "choice" (or leaving required language out).
- Hard-coding dollar thresholds without "as adjusted annually by HUD" language.
- Missing the household-change interim rule (every added or removed member).
- Offering a lower threshold for income *increases* (HUD fixes this at 10%).
- Accepting asset self-certification at reexamination without the 3-year full-verification control.
- No written hardship definition or extension rules.
- No decision recorded on Safe Harbor, EIV at interims, or revocation of consent.
- Weak file notes for thresholds, calculations, and effective dates.
- No annual threshold review process.
- Staff procedures, forms, software, and policy do not match.

What reviewers typically look for: Reviewers test whether the written policy, staff action, file documentation, notices, calculations, and system entries all tell the same story. A correct result with weak documentation can still become a finding. During a HUD review they usually ask: show me your policy, show me the supporting documentation, show me how staff followed the policy.

HOTMA readiness assessment

Check each item that is complete, then count your checks.

☐ Policies updated and Board-approved
☐ Thresholds reviewed (2026 and 2027 amounts on file)

☐ Staff trained
☐ Forms updated (including HUD-9886-A and the 2024 Form HUD-50058)
☐ Software updated
☐ Notices updated
☐ File notes standardized
☐ Verification hierarchy documented
☐ Quality control completed
☐ Annual review process established

Score	Recommended next step
9–10 Excellent	Finalize Board approval, confirm staff training, update forms and notices, and schedule the next annual threshold review.
7–8 Nearly ready	Review unchecked items, update related forms, software, notices, and staff tools, and complete a mini file review before implementation.
5–6 Needs review	Do not assume the policy is implementation-ready. Identify gaps, assign owners, and complete a policy-to-practice review before Board approval or staff rollout.
0–4 High risk	Pause implementation, complete a full HOTMA policy review, and update policy, forms, procedures, notices, software, and file tools before relying on the policy.

Final readiness question: Can a reviewer follow the agency's HOTMA decision from written policy, to staff action, to file documentation, to notice issued? If yes, the agency is ready. If no, keep tightening before rollout.

Need a second set of eyes?

Virginia Viles Services helps agencies turn HOTMA requirements into approved policy, staff procedures, training tools, and clean file documentation. Use this guide internally, or contact us for a second review before Board approval.

Policy Support
We can review your ACOP, Administrative Plan, or TSP before Board approval to help identify missing HOTMA language, unclear discretionary choices, outdated thresholds, and policy-to-practice gaps.

Complete HOTMA Staff Onboarding & Training Manual — $249.00
A ready-to-use staff manual that helps teams understand, apply, document, and explain HOTMA decisions in real files.

Staff onboarding tools
Document control, versioning, distribution guidance, staff acknowledgment, and 90-day new hire training path.

Core HOTMA modules
Annual income, assets, asset income, deductions, interims, Safe Harbor, self-certification, documentation, de minimis errors, and timelines.

Compliance support
Staff checklists, common staff errors, eligibility decision flow, update trigger checklist, and HUD review readiness principles.

Practice and reference tools
Mini case scenarios, mock HUD MOR file review benchmark, PBRA/MFH notes, student income treatment, HOTMA FAQs, and student income FAQs.

Why agencies pair them: The Policy Readiness Guide helps agencies choose and write HOTMA policy. The Staff Onboarding & Training Manual helps staff apply that policy consistently in real files.

Additional Support Available

Policy Reviews • HOTMA Policy Updates • Administrative Plans • ACOP Revisions • Tenant Selection Plans
Staff Training • File Reviews • Documentation Templates • Annual HOTMA Updates
Annual and Five-Year Plans • Financial Planning & Performance Support

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This guide is a planning and drafting reference. It does not replace HUD regulations, HUD Notices, legal advice, or Board-approved policy. Always verify current HUD guidance before adopting policy language.