HUD Compliance Checklist

A PHA Operational Self-Assessment Tool

Public Housing • Housing Choice Voucher (HCV) • Project-Based Voucher (PBV)

This checklist helps agency leadership and occupancy/compliance staff self-assess readiness across the major compliance areas HUD reviews during a Management and Occupancy Review (MOR), SEMAP scoring, and PHAS scoring. *It is a planning and self-audit tool only — it does not replace HUD regulations, HUD Notices, a formal HUD review, or your agency's approved ACOP, Administrative Plan, or PHA Plan.*

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This checklist is a self-assessment planning tool. It does not guarantee a HUD review outcome. Always verify current HUD regulations, HUD Notices, and your agency's approved ACOP/Administrative Plan/PHA Plan.

PHA / Agency Information	Review Information
Agency Name: ________________________________ **Completed By:** _______________________________ **Title:** ________________________________	**Date Completed:** _______________________________ **Next Scheduled Self-Assessment:** _______________________________ **Program(s) Covered:** ☐ Public Housing ☐ HCV ☐ PBV

How to use this checklist: For each item, mark whether the agency is Compliant, Needs Attention, or the item is Not Applicable (N/A) to your program mix, and note any supporting evidence or a corrective-action target date. Items are grouped into 11 compliance domains reflecting the areas HUD reviews most closely. This is a broad operational checklist — for HOTMA-specific implementation status and policy language choices, use the companion HOTMA Policy Readiness Guide and Policy Selection Choices Checklist.

Compliance Self-Assessment

Compliance Item	Status	Notes / Evidence / Target Date
1. Governing Documents & Plan Currency		

Compliance Item	Status	Notes / Evidence / Target Date
ACOP and/or Administrative Plan reviewed within the past 12 months and updated to reflect current HOTMA and other HUD guidance.	☐ Compliant ☐ Needs Attention ☐ N/A	______________ ______________
PHA Plan (Annual and/or 5-Year, as applicable) submitted to HUD on schedule and made available for public review.	☐ Compliant ☐ Needs Attention ☐ N/A	______________ ______________
Board of Commissioners has formally approved all current policy documents in use.	☐ Compliant ☐ Needs Attention ☐ N/A	______________ ______________
Utility Allowance Schedule reviewed and, if needed, updated within the past 12 months.	☐ Compliant ☐ Needs Attention ☐ N/A	______________ ______________
Voucher payment standards reviewed against the current Fair Market Rents (FMRs) for the area.	☐ Compliant ☐ Needs Attention ☐ N/A	______________ ______________
2. Eligibility, Income & Rent Determination		
HOTMA income exclusions and definitions applied consistently at admission, interim, and annual actions. *24 CFR 5.609, 5.603*	☐ Compliant ☐ Needs Attention ☐ N/A	______________ ______________
EIV Income and IVT reports obtained and reviewed at every annual reexamination.	☐ Compliant ☐ Needs Attention ☐ N/A	______________ ______________
De minimis error correction rule applied consistently: overcharges corrected retroactively; a family is never required to repay a PHA-caused undercharge.	☐ Compliant ☐ Needs Attention ☐ N/A	______________ ______________
Safe Harbor, if used, is limited to annual reexamination and documented per policy.	☐ Compliant ☐ Needs Attention ☐ N/A	______________ ______________
Verification hierarchy followed and the basis for each income determination documented in the file.	☐ Compliant ☐ Needs Attention ☐ N/A	______________ ______________
A sample of Total Tenant Payment / rent calculations spot-checked for accuracy as part of routine quality control.	☐ Compliant ☐ Needs Attention ☐ N/A	______________ ______________
3. Assets & HOTMA Implementation Status		
Asset limitation enforced at admission without exception, consistent with the HUD-mandatory baseline (no PHA discretion at admission).	☐ Compliant ☐ Needs Attention ☐ N/A	______________ ______________
Reexamination-stage asset enforcement approach (non-enforcement, full enforcement, or limited enforcement with cure) adopted, documented, and applied consistently.	☐ Compliant ☐ Needs Attention ☐ N/A	______________ ______________

Compliance Item	Status	Notes / Evidence / Target Date
Asset self-certification policy applied consistently at admission and/or annual reexamination, with full third-party verification at least every 3 years.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
Current HUD-published asset thresholds, passbook rate, and deduction amounts in use match the currently effective calendar year.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
Form HUD-9886-A in current use; local policy on the consequences of revoking consent documented and communicated to families.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
4. Interim Reexaminations & Reporting		
Interim reexamination policy applies HUD's mandatory 10% income-increase threshold (not a lower PHA-selected figure).	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
PHA-selected income-decrease threshold (10% or lower) documented in policy.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
"Not processed" file note standard followed when a reported change does not meet the applicable threshold.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
Family reporting deadlines and interim-processing timeframes communicated to families and applied consistently.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
5. Physical Condition & Inspections		
Units inspected on the required schedule (initial move-in, periodic, and quality-control reinspections).	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
NSPIRE inspection standard applied, or a documented transition plan is in place if still completing the move from HQS/UPCS. *National Standards for the Physical Inspection of Real Estate*	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
Health-and-safety deficiencies corrected within HUD-required timeframes.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
HQS/NSPIRE quality-control reinspections conducted consistent with SEMAP standards.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
Lead-based paint disclosure, testing, and hazard-reduction requirements met for applicable pre-1978 housing. *24 CFR Part 35*	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
6. Occupancy, Waiting List & Reasonable Accommodation		

Compliance Item	Status	Notes / Evidence / Target Date
Waiting list purged/updated on a regular schedule; local preferences applied consistently and documented.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
Occupancy standards documented in policy and applied uniformly across applicants and residents.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
Reasonable accommodation requests logged, tracked, and responded to within a documented timeframe.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
Section 504/ADA accessible-unit requirements met and accessible units offered appropriately.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
7. Fair Housing, VAWA & Nondiscrimination		
Fair Housing Act nondiscrimination policy posted at agency offices and covered in staff training.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
Limited English Proficiency (LEP) language access plan in place and followed.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
VAWA Notice of Occupancy Rights (Form HUD-5380) provided at all required program milestones.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
VAWA Emergency Transfer Plan (Form HUD-5381) adopted, documented, and available to residents on request.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
Affirmative Fair Housing Marketing Plan current, where applicable to the program.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
8. EIV Usage & Data Security		
EIV Coordinator formally designated for the agency.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
Required EIV reports (Income/IVT, Deceased Tenant, Identity Verification, Immigration, Multiple Subsidy) reviewed on HUD's required schedule.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
EIV-identified discrepancies resolved and documented within HUD-required timeframes.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______
All EIV users have completed the required EIV Rules of Behavior and annual security awareness training.	☐ Compliant ☐ Needs Attention ☐ N/A	______ ______

Compliance Item	Status	Notes / Evidence / Target Date
Printed and electronic EIV data secured, access-restricted, and disposed of per HUD data-security requirements.	☐ Compliant ☐ Needs Attention ☐ N/A	____________ ____________
9. Financial Management & Procurement		
Annual independent audit completed and submitted to HUD on schedule.	☐ Compliant ☐ Needs Attention ☐ N/A	____________ ____________
Procurement policy and practice follow current Federal procurement standards. *2 CFR Part 200*	☐ Compliant ☐ Needs Attention ☐ N/A	____________ ____________
Operating and capital fund budgets submitted and approved on schedule.	☐ Compliant ☐ Needs Attention ☐ N/A	____________ ____________
Administrative fee reserve and other restricted funds tracked and reconciled.	☐ Compliant ☐ Needs Attention ☐ N/A	____________ ____________
10. Program Integrity & Records Retention		
Fraud/program-abuse detection, investigation, and referral procedures documented and followed.	☐ Compliant ☐ Needs Attention ☐ N/A	____________ ____________
Tenant files retained for the required period: generally the term of the lease plus at least 3 years; most other program records at least 3 years. *24 CFR 982.158 (HCV); comparable Public Housing recordkeeping requirements*	☐ Compliant ☐ Needs Attention ☐ N/A	____________ ____________
Physical and electronic record storage meets confidentiality and data-security requirements.	☐ Compliant ☐ Needs Attention ☐ N/A	____________ ____________
Quality-control sampling of tenant files conducted at least annually.	☐ Compliant ☐ Needs Attention ☐ N/A	____________ ____________
11. Resident Participation & Grievance Procedures		
Resident Advisory Board (or equivalent resident body) consulted on the PHA Plan.	☐ Compliant ☐ Needs Attention ☐ N/A	____________ ____________
Grievance procedure available to residents and provided/posted per policy.	☐ Compliant ☐ Needs Attention ☐ N/A	____________ ____________
Informal hearing (Public Housing) and informal conference/review (HCV) procedures documented and followed.	☐ Compliant ☐ Needs Attention ☐ N/A	____________ ____________

Compliance Item	Status	Notes / Evidence / Target Date
Notices of adverse action include the required grievance, hearing, and appeal-rights language.	☐ Compliant ☐ Needs Attention ☐ N/A	____________________ ____________________

Readiness Summary & Next Steps

Tally your results: Count the number of items marked Compliant, Needs Attention, and N/A above, then use the table below as a general guide to next steps. This is a planning aid, not a HUD scoring formula — SEMAP and PHAS use their own official scoring methodologies.

Needs Attention Count	Suggested Next Step
0–3	Strong readiness. Schedule the next self-assessment and monitor any open items to closure.
4–8	Assign an owner and target date to each open item; recheck before your next HUD monitoring visit or MOR.
9–15	Prioritize by risk (fair housing, VAWA, EIV, and financial items first); consider a focused corrective-action plan with leadership and Board visibility.
16+	Treat this as a full compliance review priority. Consider engaging outside compliance support to build and track a corrective-action plan across all open domains.

Sign-off: By completing this checklist, the signer confirms this self-assessment reflects the agency's current operating practices to the best of their knowledge as of the date below, and that any items marked Needs Attention will be assigned an owner and target date for resolution.

Completed By: ______________________________ Title: ______________________ Date: _________________