



# Public Meeting Announcement

The Housing Authority of Snohomish County (HASCO) will hold a Public Meeting at their office on April 16, 2024 at 12:00pm PST to hear public comments on the planned changes to the HASCO Administrative Plan. Attached is a summary of the anticipated changes. Comments can be accepted ahead of the public meeting via email at [sconeill@hasco.org](mailto:sconeill@hasco.org) or by dropping off or mailing a note at the HASCO office:

**ATTN: Sara O'Neill,  
TBA Administrative Specialist.  
12711 4th Ave West  
Everett WA, 98204**

Your input is vital to impacting HASCO's plan going forward. Thank You!

# Summary of Spring 2024 Administrative Plan Updates

Below is a high-level summary of the changes that will be made to HASCO's Administrative Plan in April 2024. Changes regarding NSPIRE will go into effect on 10/1/2024. Changes regarding HOTMA will go into effect on 1/1/2025. See *Highlights of Final Rule Implementing Sections 102, 103, 104 of HOTMA* for highlights of the actual changes related to HOTMA.

## Chapter 1

- Add information on the Housing Opportunity through Modernization Act (HOTMA) to the Overview and History of the Program section.
- Revise the section on Contents of the Plan to include information on project-based vouchers and policies governing special housing types.
- Revise the list of owner responsibilities to account for NSPIRE.

## Chapter 2

- Expand the existing policies on discrimination complaints with a new section on Discrimination Complaints., which includes guidance from Notice FHEO 2023-01.

## Chapter 3

- Revise various areas of the chapter to account for HOTMA changes, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic. This includes a new section on Restriction on Assistance Based on Assets.
- Include the term *human trafficking* with Violence Against Women Act (VAWA) language, in addition to other VAWA clarifications to better align with current guidelines such as the implementation Guidance for VAWA 2022 published in the *Federal Register* on January 4, 2023.
- Clarify language on disparate impact and discriminatory effects per the final rule dated March 31, 2023.
- Update cross-references to correspond with updates in Chapter 8.

## Chapter 4

- Include the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.

## Chapter 5

- Include the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.
- Revise family obligations to account for NSPIRE.

## Chapter 6

- This chapter will be completely rewritten from the ground up to account for HOTMA changes, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic.
- Included also will be changes regarding exceptions to utility allowances as a reasonable accommodation.

## Chapter 7

- As with Chapter 6, the bulk of this chapter will undergo a complete rewrite for HOTMA. Many of the changes are required due to updates in verification requirements outlined in Notice PIH 2023-27.

## Chapter 8

- Make extensive rewrites to update for NSPIRE requirements.
- Make a minor policy adjustment to the Inspection Results section to disallow self- certification of repairs

## Chapter 9

- Include the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.
- Make additions and updates to citations for NSPIRE.

## Chapter 10

- Include the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.
- Remove references to Housing Quality Standards.
- Remove duplicative/conflicting policy information regarding voucher extensions and expiration.
- Clarify policy regarding sending documentation to the receiving PHA.

## Chapter 11

- As with Chapters 6 and 7, the bulk of this chapter will undergo a complete rewrite to account for HOTMA, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic.
- Remove references to HQS and updated for NSPIRE.
- Update policy language to mirror language elsewhere in the admin plan.

## Chapter 12

- Revise the policy that the PHA will terminate assistance if the family has been evicted from federally assisted housing in the last five years to reduce the number of years to three.
- Include the term *human trafficking* with Violence Against Women Act (VAWA) language, in addition to other VAWA clarifications to better align with current guidelines such as the implementation Guidance for VAWA 2022 published in the *Federal Register* on January 4, 2023.
- Update Exhibit 12-1, Statement of Family Obligations, with NSPIRE language.

## Chapter 13

- Revise policy in HAP Contract Term and Terminations section for clarification.
- Include the term *human trafficking* with Violence Against Women Act (VAWA) language, in addition to other minor VAWA clarifications to better align with current guidelines such as the implementation Guidance for VAWA 2022 published in the *Federal Register* on January 4, 2023.
- Remove references to HQS and updated for NSPIRE.

## Chapter 14

- Add a new subsection and accompanying policy on De Minimis Errors, plus a minor clarification to account for HOTMA changes, including the Final Rule issued February 14, 2023, Notice PIH 2023-27, and other sources of HUD guidance on the topic.
- Remove references to HQS and updated for NSPIRE.

## Chapter 15

- Rework Chapter 15 to include the policies by default rather than directing to the guide. Policies are now included where relevant in the event that the PHA grants use of a special housing type as needed as a reasonable accommodation.
- Multiple updates to account for NSPIRE's effect on various special housing types.

## Chapter 16

- Include the term *human trafficking* with Violence Against Women Act (VAWA) language, in addition to other VAWA clarifications to better align with current guidelines such as the implementation Guidance for VAWA 2022 published in the *Federal Register* on January 4, 2023.
- Include changes regarding exceptions to utility allowances as a reasonable accommodation.
- Modify the policy on evidence for the informal hearing to eliminate the charge of copying documents related to the hearing.
- Add a record retention policy that the PHA will keep for at least three years records of all complaints, investigations, notices, and corrective actions related to fair housing violations.
- Remove references to HQS and updated for NSPIRE.

## Chapter 17

- Make minor updates to account for the *Federal Register* notice issued March 3, 2023, on subsidy layering requirements.
- Add a minor clarification on asset limitation requirements to the section on Eligibility for PBV Assistance to account for HOTMA changes.
- Include the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.
- Multiple updates throughout to account for NSPIRE's effect on PBV program requirements.

## Chapter 18

- Revise Part II on the Foster Youth to Independence (FYI) Initiative to account for guidance set forth in Notice PIH 2023-04.
- Include the term *human trafficking* with Violence Against Women Act (VAWA) language to better align with current guidelines.
- Remove references to HQS and update for NSPIRE.

## Glossary

- Update acronyms and definitions for all cumulative changes specified above.
- Revise various definitions for HOTMA.
- Remove references to HQS and updated for NSPIRE.

# Highlights of Final Rule Implementing Sections 102, 103, 104 of HOTMA

The Final Rule implementing Sections 102, 103, and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) delivers important benefits to tenants and reduces administrative burdens for public housing agencies (PHAs), multifamily housing owners (MFH owners), and participating jurisdictions. The highlights of the Final Rule are outlined below.

## Section 102: Income Reviews

- Fewer Interim Reexaminations: HOTMA creates a 10% adjusted income increase/decrease threshold for conducting Interim Reexaminations, and in most cases requires that increases in earned income are not processed until the next Annual Reexamination, allowing families to keep more of their earnings before receiving a rent increase. The new requirements should lead to fewer Interim Reexaminations overall, alleviating burden for both participants and PHAs.
- Streamlined Verifications: Several provisions will streamline the verification process for housing providers.
  - Adults Only Need to Sign Consent Form Once: HOTMA revises the required consent form that all adult household members sign, allowing them to sign the form only once instead of annually.
  - Use of Income Determinations from Other Programs: HOTMA allows PHAs to use income determinations made under other federal benefits programs for reexaminations.
  - Review of EIV Not Required at Interim Reexamination: HOTMA eliminates the requirement for PHAs to use EIV to verify tenant employment and income information during an interim reexamination, significantly reducing administrative burden.
- Increased Standard Deduction for Elderly/Disabled Households: HOTMA increases standard deductions for families with a head, co-head, or spouse who is elderly or a person with a disability.
- Additional Income Exclusions: The rule codifies additional income and asset exclusions, including:
  - Amounts received from Medicaid or other state/local programs meant to keep a family member with a disability living at home
  - Veterans' aide and attendant care
  - Distributions of principal from non-revocable trusts, including Special Needs Trusts.
- Threshold for Claiming Medical/Disability Expenses Increased: HOTMA increases the allowance for unreimbursed health and medical care expenses from 3% of annual income to 10%, phased-in over two years.
- Higher Threshold for Imputing Asset Income: HOTMA raises the imputed asset threshold from \$5,000 to \$50,000, incentivizing families to build wealth without imputing income on those assets.

Hardship Relief: HOTMA provides hardship relief for expense deductions, lessening the impact of the increased threshold for medical expenses. HOTMA permits PHAs to grant hardship relief to families unable to pay rent because of unanticipated medical/disability expenses and families who are no longer eligible for the childcare expense deduction.

### **Section 103: Public Housing Income Limit**

- Public Housing Income Limitation: HOTMA imposes continued program participation limits for families exceeding the statutory income limitation in the Public Housing program, also known as the “over-income” provision.

### **Section 104: Asset Limits**

- Asset Limitation: HOTMA imposes a \$100,000 asset limit for eligibility and continued assistance. Families are also ineligible for assistance if they own real property suitable for occupancy. PHAs have the option of delaying enforcement/termination for up to six months if the family is over the asset threshold at the time of annual reexamination.
- Exclusion of Retirement and Educational Savings Accounts: Retirement accounts and educational savings accounts will not be considered a net family asset. This is a major benefit to families, incentivizing savings for important life milestones and opportunities. This will also provide significant administrative relief to PHAs by allowing them to stop verifying and calculating these assets altogether.
- Self-Certification of Assets under \$50,000: HOTMA allows self-certification of net assets if estimated to be at or below \$50,000. This will be a time-savings for families and lower administrative burden for PHAs recertifying income.
- Cross-Cutting Adjustments for Inflation: Deductions and the asset limitation will be adjusted for inflation annually, ensuring that deductions do not lose value over time and that families are able to build more wealth without losing program assistance. The current deduction amounts have never been adjusted.