Board of Commissioners Meeting
Tuesday, November 10, 2026, at 12 pm
County Housing Headquarters
8865 Natural Bridge Road
St. Louis, Missouri 63121

AGENDA

Item	Individual	Action
1. Call to Order	Chair	Informational
2. Roll Call	Terri Acoff-States	Informational
3. Approval of Minutes Regular Meeting September 8, 2026	Chair	Motion, 2nd, Vote
4. Public Comments	Chair	Informational
5. Executive Director's Report	Shannon Koenig	Informational
6. Reports of Officers and Employees		
A. Financial Reports for period ending August 31, 2026	Ben Washington	Motion, 2nd, Vote
B. County Housing Public Housing Write Offs 2026 Q3, Resolution No. 1470	Ben Washington	Motion, 2nd, Vote
C. County Housing Authority FY 2027 Budget, Resolution No. 1472	Ben Washington	Motion, 2nd, Vote
D. Public Housing Performance Report	Kawanna Tate	Informational
E. Housing Choice Voucher Program Administrative Plan Revisions, Resolution No. 1471	Nicole Alexander	Motion, 2nd, Vote
F. Landlord Incentives Program	Jennifer Wiegert	Informational
G. Customer Service & Engagement Report	Jennifer Wiegert	Informational
7. Unfinished Business	Chair	Informational
8 . New Business	Chair	Informational
9. Executive Session	Chair	Motion, 2nd, Vote

Subject to an affirmative vote of the Board of Commissioners, an Executive Session may be held to discuss personnel issues, real estate, or litigation matters pursuant to RSMo Sections 610.021 to 610.022.

10. Announcements Next Meeting January 12, 2027	Chair	Informational
11. Adjournment	Chair	Motion, 2nd, Vote

DRAFT

COUNTY HOUSING
BOARD OF COMMISSIONERS REGULAR MEETING
TUESDAY, SEPTEMBER 8, 2026
MEETING MINUTES

ATTENDANCE:

COMMISSIONERS:
Lora Gulley, Acting Chair
Nate Arnold, Commissioner
Tiffany Charles, Commissioner
LaToya Scott, Commissioner

STAFF:
Shannon Koenig, Executive Director and CEO
Terri Acoff-States, Executive Assistant
Benjamin Washington, Chief Financial Officer
Nicole Alexander, Director, Housing Choice Voucher Program
William Barry, Director of Inspections, Quality Control, and Capital Programs
Kawanna Tate, Director, Housing Administration

Guest:
Rich Larsen, Novogradac and Company
Ms. Mita Biswas, live in aide to public housing resident

Approval of Minutes for the May 12, 2026 Regular Meeting:

Acting Chair Gulley asked for a motion to approve the minutes of the regular board meeting held May 12, 2026. Commissioner Charles motioned for approval, Commissioner Arnold seconded the motion and upon roll call the "Ayes" and "Nays" were as follows:

AYES	NAYS
L. Gulley	None
N. Arnold	
T. Charles	
L. Scott	

The Acting Chair declared the motion passed.

Presentation of the County Housing Authority Audit Report for year ending December 31, 2025.

Rich Larsen, Principal with Novogradac & Co., LLP gave a presentation of the County Housing Authority Audit Report for year ending December 31, 2025.

After discussion, Acting Chair Gulley asked for a motion to approve the County Housing Authority Audit Report for year ending December 31, 2025. Commissioner Scott motioned for approval, Commissioner Arnold seconded the motion. Upon roll call, "Ayes" and "Nays" were as follows:

AYES	NAYS
L. Gulley	None
N. Arnold	
T. Charles	
L. Scott	

The Acting Chair declared the motion passed.

DRAFT

COUNTY HOUSING
BOARD OF COMMISSIONERS REGULAR MEETING
TUESDAY, SEPTEMBER 8, 2026
MEETING MINUTES

PUBLIC HEARING:

The board held a public hearing on the Annual PHA Plan for 2027 and the Capital Funds Action Plan for 2031. The purpose of this hearing was to allow the public an opportunity to comment on each of these plans.

Acting Chair Gulley called to order the public hearing and invited anyone from the public to comment. There were no public comments. The hearing was adjourned.

PUBLIC COMMENTS:

Ms. Biswas greeted the Board and expressed her appreciation for the opportunity to address the Board on behalf of her mother. Ms. Biswas raised concerns about HUD's calculation of her mother's rent, as well as maintenance issues.

EXECUTIVE DIRECTOR'S REPORT:

Ms. Koenig greeted everyone and thanked them for attending the meeting.

Ms. Koenig reported that the House Transportation, Housing and Urban Development, and Related Agencies Subcommittee released its FY2027 budget appropriations proposal, which includes an overall reduction of approximately 10% to the HUD budget. She stated proposed reductions and programmatic changes are spread across multiple programs.

Ms. Koenig informed the board that County Housing will be conducting its annual employee engagement survey to confidentially gather workforce feedback and use the results to inform current and future engagement strategies.

Ms. Koenig presented the board with a performance report that provides information for all four housing authorities operating under the County Housing umbrella. She reported the PHAS and SEMAP scores have remained steady or improved.

REPORTS OF OFFICERS AND EMPLOYEES:

A. Financial Reports for the period ending June 30, 2026:

Mr. Washington reviewed the Financial Reports for the period ending June 30, 2026. After discussion, Acting Chair Gulley asked for a motion to approve the June 20, 2026 Financial Reports as read. Commissioner Scott moved for approval, Commissioner Charles seconded the motion. Upon roll call the "Ayes" and "Nays" were as follows:

AYES	NAYS
L. Gulley	None
N. Arnold	
T. Charles	
L. Scott	

The Acting Chair declared the motion passed.

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B. County Housing Public Housing Write-Offs - Resolution No. 1467:

Mr. Washington presented the board with the quarterly write-offs of uncollectable rents.

After review and discussion, Acting Chair Gulley asked for a motion to approve Resolution No. 1467, County Housing Public Housing Write-Offs. Commissioner Scott motioned for approval, Commissioner Arnold seconded the motion. Upon roll call the "Ayes" and "Nays" were as follows:

AYES	NAYS
L. Gulley	None
N. Arnold	
T. Charles	
L. Scott	

The Acting Chair declared the motion passed.

C. Public Housing Program Performance:

Ms. Tate reviewed public housing activities within the framework of the Public Housing Assessment System. She presented an overview of the physical, management and financial assessment subsystems along with the progress of the capital fund program.

Ms. Tate updated the Board on the status of the occupancy alignment of public housing families being moved to appropriately sized units.

D. Annual PHA Plan (2027) and Certification of Compliance:

Ms. Koenig presented the board with the 2027 Annual PHA Plan. She stated the 2027 Annual PHA Plan is a HUD required document that details the housing authority's policies, programs, and strategies for meeting local housing needs and goals. Ms. Koenig stated County Housing's 2027 Annual PHA Plan describes the updates made to the organization's policies and planned activities for the upcoming fiscal year.

After discussion, Acting Chair Gulley asked for a motion to approve the Housing Authority of St. Louis County's 2027 Annual PHA Plan. Commissioner Scott motioned for approval, Commissioner Charles seconded the motion. Upon roll call the "Ayes" and "Nays" were as follows:

AYES	NAYS
L. Gulley	None
N. Arnold	
T. Charles	
L. Scott	

The Acting Chair declared the motion passed.

E. Capital Funds Action Plan (2031):

Mr. Barry presented the board with the Capital Funds Action Plan for 2031. He stated the Capital Fund Program (CFP) provides funds annually to Public Housing Agencies (PHAs) for the development, financing, and modernization of public housing developments and management improvements. By providing financial support for capital improvements, the program helps PHAs address the backlog of repairs, create healthier living environments, and promote the overall well-being of residents in public housing communities.

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After discussion, Acting Chair Gulley asked for a motion to approve the Capital Funds Action Plan for 2031. Commissioner Charles motioned for approval; Commissioner Arnold seconded the motion. Upon roll call the "Ayes" and "Nays" were as follows:

AYES	NAYS
L. Gulley	None
N. Arnold	
T. Charles	
L. Scott	

The Acting Chair declared the motion passed.

F. Housing Choice Voucher Program Updates:

Ms. Alexander presented the board with updates regarding the Housing Choice Voucher program that included administration of additional tenant protection vouchers. She also informed them of upcoming training opportunities for the HCV Team, and introduced a new policy within the HCV program.

G. Landlord Incentive Program Updates:

Ms. Wiegert presented the board with a first quarter update on the Landlord Incentives Program. She stated as of the end of Q1, the program has received a total of 10 requests, of which nine have been approved and one denied.

Ms. Wiegert summarized the program is performing as intended in its early stages, with strong approval rates and diverse utilization across eligible categories. She said staff will continue to monitor trends, promote program awareness, and ensure funds are deployed strategically to maximize landlord participation and housing stability outcomes.

H. Real Estate Development Report:

Ms. Koenig updated the Board on County Housing's current real estate development activities and near-term development plans, including new developer partnerships, recent CDBG-DR awards, and pending Low-Income Housing Tax Credit applications.

UNFINISHED BUSINESS:

No unfinished business was discussed.

NEW BUSINESS:

A. Election of Officers

The board held an election of officers, during which commissioners voted to elect Lora Gulley as Chair and LaToya Scott as Vice Chair.

DRAFT

COUNTY HOUSING
BOARD OF COMMISSIONERS REGULAR MEETING
TUESDAY, SEPTEMBER 8, 2026
MEETING MINUTES

EXECUTIVE SESSION:

Chair Gulley asked for a motion to end the Regular Session and enter an Executive Session. Vice Chair Scott motioned to enter. Commissioner Arnold seconded the motion to end the Regular Session and enter Executive Session, and upon roll call the "Ayes" and "Nays" were as follows:

AYES	NAYS
L. Gulley	None
N. Arnold	
T. Charles	
L. Scott	

The Chair declared the motion passed.

Chair Gulley motioned to exit Executive Session. Commissioner Charles seconded the motion to exit and upon roll call the "Ayes" and "Nays" were as follows:

AYES	NAYS
L. Gulley	None
N. Arnold	
T. Charles	
L. Scott	

The Chair declared the motion passed.

ANNOUNCEMENTS:

Ms. Koenig announced the resignation of Commissioner Joan Kelly-Horn effective August 2026.

The next meeting is scheduled for Tuesday November 10, 2026.

ADJOURNMENT OF MEETING:

There being no further business to come before the Board, Chair Gulley asked for a motion to adjourn the meeting. Commissioner Arnold moved for adjournment, which was seconded by Commissioner Charles. Upon roll call the "Ayes" and "Nays" were as follows:

AYES	NAYS
L. Gulley	None
N. Arnold	
T. Charles	
L. Scott	

The Chair declared the motion passed.

_____
Chair

_____
Secretary

_____
Date

DRAFT

MEMORANDUM

To: County Housing Board of Commissioners

From: Shannon Koenig, Executive Director and CEO

Date: November 10, 2026

Subject: *Executive Director's Report*

This memo provides an update on various County Housing related matters.

I. FY27 Appropriations Update

In early April, the President released the proposed FY27 federal budget, which recommended an overall reduction of approximately 13 percent to the U.S. Department of Housing and Urban Development (HUD) budget. This summer, the House Transportation, Housing and Urban Development, and Related Agencies (THUD) Subcommittee released its FY27 appropriations bill, which proposes an overall HUD budget reduction of about 10 percent. Recommended decreases are spread across multiple programs. The Senate has not yet released its recommendations. The proposed FY27 budget incorporates anticipated reductions across all four housing authorities.

II. FY27 Low-Income Housing Tax Credit Awards Announced Soon

It is expected that the Missouri Housing Development Commission will announce awards this month. County Housing and our partners have two proposals under consideration: Peace Place Apartments and Rothwell Heights redevelopment.

III. Planning and Strategy

The leadership team is planning work for 2027, continuing to focus on our core objectives related to operational performance, increasing access to affordable housing and resident engagement. Initiatives and work planned for 2027 will be shared with the board in January.

IV. Customer Service Update

The annual customer service surveys have been distributed to Public Housing residents, Housing Choice Voucher participants, and landlords. We ask that survey responses be submitted by November 25. Paper copies are also available in our lobby and at public housing management offices. These surveys are an important tool for gathering feedback and identifying areas for improvement as we work to enhance our services and strengthen relationships with residents and partners.

MEMORANDUM

To: County Housing Board of Commissioners

Through: Shannon Koenig, Executive Director and CEO

From: Benjamin C. Washington, CPA, Chief Financial Officer

Date: November 10, 2026

Subject: *Financial Summary*

This memo provides a narrative explanation of the financial reports for the period ending August 31, 2026.

I. Recommendation

Staff recommend that the Board approve the financial statements and accompanying narrative, as prepared.

II. Highlights

A. Revenue

The total YTD actual operating revenue of $57,326,089 exceeded the total YTD budget revenue of $49,260,129 by $8,065,960 or 16%.

- Total Voucher Grants contributed $7.7 million to the favorable variance. Specifically, the Housing Choice Voucher (HCV) Housing Assistance Payment (HAP) revenues exceeded the budget due to HUD-held reserve requests.
- Total Capital Grants contributed $3,031,426 in receipts. This amount is capitalized on the Balance Sheet and is excluded from Total Income on the Income Statement.

B. Expense

Total YTD actual operating expenses of $54,976,412 exceeded the total YTD budget expenses of $48,965,928 by $6,010,484 or 12%.

- Total HCV rents and utility reimbursements were higher than budgeted by $5,652,120 due primarily to the HUD-implemented initiative, Small Area Fair Market Rents (SAFMRs). County Housing is required to pay market-rate rents in the applicable zip code areas. Additionally, County Housing abides by its “Hold Harmless Policy” to pay higher rents to keep tenants stable in their current housing when the market-rate rent payment decreases for the landlord. County Housing provides the gap funding.
- Total Public Housing Occupancy expenses related to the AMPs had an unfavorable budget variance of $275,567 due primarily to excess contract costs and other occupancy expenses.

- Total Other General expenses had a favorable budget variance of $127,806 due primarily to timing issues related to internal charges offset by higher other administrative expenses.

C. Net Income
Total net operating income is $2,349,678 before depreciation of $322,394, resulting in a bottom line of $2,027,284.

D. Cash
As of August 31, 2026, the adjusted cash balance in the USB Agency Disbursing operating bank account was $273,300, which was unrestricted.

As of August 31, 2026, the adjusted cash balance in the HCV operating bank account was $4,216,996. The total HAP and administrative fees received were $6,776,929. The total HAP expenses were $6,396,650.

III. Attachments
A. Budgeted Income Statement
B. Cash Report

Housing Authority of St. Louis County
Budgeted Income Statement
SUMMARY - ALL
As of August 31, 2026

		Entity Wide			COCC			AMP's			HCV - ALL			BA		
		YTD Actual	YTD Budget	Variance	YTD Actual	YTD Budget	Variance	YTD Actual	YTD Budget	Variance	YTD Actual	YTD Budget	Variance	YTD Actual	YTD Budget	Variance
	OPERATING ITEMS															
4099-00-940	Total Voucher Grants	53,791,813	46,125,486	7,666,327	-	-	-	-	-	-	53,791,813	46,125,486	7,666,327	-	-	-
4199-00-940	Total Operating Subsidy	841,086	694,675	146,410	-	-	-	841,086	694,675	146,410	-	-	-	-	-	-
4399-00-940	Total Tenant Charges	306,936	737,896	(430,960)	-	-	-	296,734	620,953	(324,219)	(237)	2,439	(2,677)	10,440	114,504	(104,064)
4499-00-940	Total Fraud Recovery	-	23,001	(23,001)	-	-	-	-	-	-	-	23,001	(23,001)	-	-	-
4599-00-250	Total Investment Income	60,468	81,391	(20,922)	1,134	1,026	108	168	180	(12)	3,067	2,693	374	56,099	77,492	(21,393)
4699-00-950	Total Miscellaneous Other Income	999,150	222,271	776,879	60,733	140,151	(79,419)	(513)	18,127	(18,640)	489,874	45,018	444,856	449,057	18,975	430,083
4997-00-950	Total Internal Income	1,326,636	1,375,410	(48,774)	1,326,636	1,375,410	(48,774)	-	-	-	-	-	-	-	-	-
	Total Income	**57,326,089**	**49,260,129**	**8,065,960**	**1,388,503**	**1,516,587**	**(128,085)**	**1,137,474**	**1,333,935**	**(196,460)**	**54,284,516**	**46,198,636**	**8,085,879**	**515,596**	**210,971**	**304,626**
5999-00-940	Total Rents and Utility Reimbursements	47,416,408	41,749,792	5,666,616	-	-	-	49,933	35,437	14,496	47,366,475	41,714,355	5,652,120	-	-	-
6299-00-940	Total Salaries	2,431,592	2,469,573	(37,981)	711,136	633,115	78,021	315,196	298,083	17,113	1,389,855	1,518,669	(128,813)	15,404	19,707	(4,302)
6599-00-940	Total Benefits and Taxes	1,023,448	719,189	304,259	253,518	154,077	99,440	161,280	98,892	62,387	604,045	461,368	142,677	4,606	4,851	(246)
6699-00-940	Total Other Employee Costs	60	1,100	(1,040)	60	1,100	(1,040)	-	-	-	-	-	-	-	-	-
6799-00-940	Total Training, Seminars, Conferences	18,410	47,893	(29,483)	18,007	6,467	11,540	24	5,174	(5,150)	359	31,940	(31,581)	20	4,312	(4,292)
	Total Admin Expenses	50,889,918	44,987,547	5,902,371	982,721	794,759	187,961	526,433	437,586	88,847	49,360,734	43,726,332	5,634,402	20,030	28,870	(8,840)
7099-00-950	Total Utilities	298,530	321,760	(23,230)	36,610	36,487	123	253,124	280,939	(27,815)	-	-	-	8,796	4,333	4,462
7199-00-950	Total Materials	83,278	141,329	(58,051)	5,259	3,185	2,075	76,733	138,145	(61,412)	-	-	-	1,286	-	1,286
7299-00-950	Total Contract Costs	512,067	385,092	126,974	35,182	26,739	8,442	443,590	293,900	149,690	1,151	45,920	(44,769)	32,144	18,533	13,611
7399-00-950	Total Tenant Services Expense	57,197	74,643	(17,446)	-	-	-	3,889	615	3,275	53,308	74,029	(20,721)	-	-	-
7499-00-950	Total Other Maintenance Expenses	17,432	2,167	15,265	4,441	500	3,941	11,972	1,333	10,638	1,019	333	686	-	-	-
7599-00-950	Total Outside Services	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7699-00-950	Total Other Occupancy Expenses	302,469	110,061	192,407	12,322	12,420	(98)	244,183	42,993	201,190	40,296	46,369	(6,072)	5,668	8,280	(2,612)
	Total Occupancy Expenses	1,270,972	1,035,053	235,919	93,813	79,331	14,482	1,033,491	757,924	275,567	95,774	166,651	(70,877)	47,894	31,147	16,747
8099-00-950	Total Insurance	411,284	423,688	(12,404)	84,968	97,268	(12,301)	248,613	268,327	(19,713)	68,522	52,513	16,009	9,182	5,581	3,601
8199-00-950	Total Outside Services	196,631	183,580	13,051	54,145	29,609	24,535	17,858	23,688	(5,830)	42,134	110,543	(68,409)	82,494	19,740	62,754
8299-00-950	Total Professional Fees	297,892	270,487	27,405	83,243	43,590	39,653	56,974	34,872	22,102	127,745	162,965	(35,220)	29,930	29,060	870
8399-00-950	Total Other Fees	67,614	125,408	(57,794)	38,298	27,328	10,970	7,445	3,254	4,191	21,729	94,385	(72,656)	142	441	(299)
8499-00-950	Total Telephone and Technology	346,831	365,000	(18,169)	61,680	59,149	2,530	39,763	47,606	(7,843)	230,491	219,117	11,374	14,898	39,128	(24,231)
8599-00-950	Total Other Administrative Expenses	167,433	75,165	92,268	77,221	-	77,221	27,963	13,885	14,078	61,817	52,020	9,797	431	9,260	(8,829)
8996-00-950	Total Internal Charges	1,327,836	1,500,000	(172,163)	-	-	-	127,025	181,694	(54,669)	1,199,611	1,318,306	(118,694)	1,200	-	1,200
	Total Other General Expenses	2,815,522	2,943,328	(127,806)	399,554	256,945	142,610	525,641	573,326	(47,684)	1,752,050	2,009,848	(257,798)	138,276	103,209	35,067
	Total Expenses	**54,976,412**	**48,965,928**	**6,010,484**	**1,476,088**	**1,131,036**	**345,052**	**2,085,565**	**1,768,836**	**316,729**	**51,208,558**	**45,902,830**	**5,305,728**	**206,200**	**163,226**	**42,974**
	Total Operating Income (Loss)	**2,349,678**	**294,201**	**2,055,477**	**(87,585)**	**385,552**	**(473,137)**	**(948,091)**	**(434,901)**	**(513,190)**	**3,075,958**	**295,806**	**2,780,152**	**309,396**	**47,744**	**261,652**
	NON-OPERATING ITEMS															
	Investment Gain/ Loss on Treasury Strips	-	-	-	-	-		-	-		-	-		-	-	-
9099-00-930	Total Depreciation Expense	(322,393.76)	(196,129.36)	(126,264.40)	(11,766)	(8,000)	(3,766.00)	(266,682.88)	(154,846.00)	(111,836.88)	(10,673.36)	-	(10,673.36)	(33,271.52)	(33,283.36)	11.84
	Total Non- Operating Items	**(322,393.76)**	**(196,129.36)**	**(126,264.40)**	**(11,766)**	**(8,000)**	**(3,766.00)**	**(266,682.88)**	**(154,846.00)**	**(111,836.88)**	**(10,673.36)**	**-**	**(10,673.36)**	**(33,271.52)**	**(33,283.36)**	**11.84**
	Net Income (Loss)	**2,027,284**	**98,072**	**1,929,212**	**(99,351)**	**377,552**	**(476,903)**	**(1,214,774)**	**(589,747)**	**(625,027)**	**3,065,284**	**295,806**	**2,769,478**	**276,125**	**14,461**	**261,664**
4299-00-940	Total Capital Grants	3,031,426	532,892	2,498,534	-	-	-	3,031,426	532,892	2,498,534	-	-	-	-	-	-
	Net Income after CFP	**5,058,710**	**630,964**	**4,427,746**	**(99,351)**	**377,552**	**(476,903)**	**1,816,652**	**(56,855)**	**1,873,507**	**3,065,284**	**295,806**	**2,769,478**	**276,125**	**14,461**	**261,664**

St. Louis County Housing Authority
Cash Report
August 2026

BEGINNING BANK CASH BALANCE 8/1/2026	**$**	**631,643**
ADD:		
Tenant Rent	$	-
CFP	$	-
FSS Deposits	$	-
Other Deposits	$	16,930
HAP Income	$	-
Operating Subsidy / Admin Fee	$	206,509
Interest	$	144
Transfer	$	223,066
TOTAL DEPOSITS	**$**	**446,649**
LESS:		
Other Transfers	$	-
Checks	$	(39,673)
Payroll/Payroll Benefits Payment	$	(336,344)
Withdraws/Other Deductions	$	(54,604)
Operating Subsidy Out	$	(154,770)
TOTAL PAYMENTS	**$**	**(585,391)**
ENDING BANK CASH BALANCE 8/31/2026	**$**	**492,900**
Ending Bank Balance 8/31/2026	$	492,900
Outstanding Checks	$	(130,810)
Deposits in Transit	$	3,828
Other Items	$	(92,619)
Adjusted Bank Balance 8/31/2026	**$**	**273,300**
Unrestricted Cash	$	273,300
Security Deposit Cash	$	-
Restricted Cash	$	-
	$	**273,300**

MEMORANDUM

To: County Housing Board of Commissioners

Through: Shannon Koenig, Executive Director and CEO

From: Benjamin C. Washington, CPA, Chief Financial Officer

Date: November 10, 2026

Subject: *Resolution No. 1470, Write-Offs of Uncollectable Rents*

Attached are the write-offs for uncollectable rents for the period ending August 31, 2026.

I. Recommendation

Staff recommend the Board approve write-offs through the end of August 2026.

COUNTY HOUSING
THE HOUSING AUTHORITY of ST. LOUIS COUNTY

8865 Natural Bridge | P.O. Box 23886
St. Louis, MO 63121
(314) 428-3200 | Fax: (314) 949-7585
Hearing Impaired: 711 or (800) 735-2966

RESOLUTION NO. 1470

AUTHORIZING QUARTERLY WRITE-OFF OF UNCOLLECTABLE RENTS
November 10, 2026

WHEREAS, the Executive Director has reported that continued unsuccessful attempts have been made to collect delinquent payments from former tenant(s) of the Housing Authority of St. Louis County; and

WHEREAS, it has been determined by the Board of Commissioners that after unsuccessful efforts to collect the delinquent payments from said former tenant, said payments in the total amount of $14,239 uncollectable and should be written off the books of the Housing Authority of St. Louis County.

NOW, THEREFORE, BE IT RESOLVED, by the Board of Commissioners of the Housing Authority of St. Louis County, that the following payments are uncollectable and should be written off the books of said Authority.

Project	Tenant's Number	Total Balance Due
MO-001	t0026613	$227
Villa/Fee Fee	t0028553	$3,608
	t0046982	$5,542
	t0008486	$57
MO-002	t0000280	$241
Single Family Homes	t0000298	$207
	t0022581	$2159
MO-004	t0000211	$99
Arbor Hills		
1004DNSP	t0044965	$2,099

Total: $14,239

_____
Chairman

_____
Secretary

_____

MEMORANDUM

To: County Housing Board of Commissioners

Through: Shannon Koenig, Executive Director and CEO

From: Benjamin C. Washington, CPA, Chief Financial Officer

Date: November 10, 2026

Subject: *County Housing FY 2027 Proposed Budget, Resolution No. 1472*

This memo accompanies the proposed FY 2027 budget and provides a list of budget assumptions and notes.

I. Recommendation

Staff recommend the Board approve Resolution No. 1472, County Housing FY 2027 Proposed Budget as submitted.

II. Budget Assumptions and Notes

- Salaries expense reflects Management's allocated staffing plan for FY 2027.
- Overall, expected health benefits and dental insurance premiums for FY 2027 had not been finalized at the time of the budget development. Benefit expenses were escalated ten percent (10%) over the FY 2026 annualized actual expenses.
- This budget includes managed PHAs. Associated income and expenses related to the management of these PHAs is incorporated throughout the FY 2027 budget. The Hillsdale and Olivette managed PHA budgets have been approved by their Boards of Commissioners. The County Housing Board of Commissioners will approve the Pagedale's PHA budget by proxy.
- The Affordable Manageable Properties (AMPs), Housing Choice Voucher Program (HCV), and the managed Public Housing Authorities (PHAs) pay a Management Fee to County Housing for providing internal management services. The aggregate Management Fees and Office Rent paid to County Housing will be $2,237,334. The Management Fees are computed based on:
    - The Asset Management Fee is calculated at $10 times Unit Months Leased (UML) times 12 months times the occupancy rate.
    - The Bookkeeping Management Fee is calculated at $7.50 times Unit Months Leased (UML) times 12 months times the occupancy rate.
    - The Management Fee is calculated at $59.04 times Unit Months Leased (UML) times 12 months times the occupancy rate.

III. Entity-wide

Significant expenses included in the budget, allocated across programs, include:

- Telephone and Technology expenses: $583,953
- Professional Fees Accounting: $275,000
- Professional Fees Legal: $153,360
- Security/Law Enforcement: $130,410
- Professional Fees Audit: $91,000
- Training and conferences: $34,400

IV. Housing Choice Vouchers

- The FY 2027 federal Housing Choice Voucher Program subsidy had not been finalized at the time of the budget development. We tentatively used the FY 2026 budget amount for the FY 2027 budget.
- Employee benefits expenses are estimated to be about 37% of salary expenses.
- A Landlord Incentive program will be funded at $100,000.
- Net operating income of $554,771 is expected for FY 2027.

V. Mainstream Vouchers

- The FY 2027 subsidy had not been finalized at the time of the budget development. We tentatively used the FY 2026 amount for the FY 2027 budget.
- A net operating income of $43,268 is expected for FY 2027.

VI. Public Housing

- Subsidy based on approved Form 52723 *Operating Fund Calculation of Operating Subsidy,* adjusted for a potential 10% funding reduction.
- Capital Funds aggregating $976,656 are expected for AMP 1 and AMP 2. The total was allocated between project hard costs ($634,826) and operations/administrative soft costs ($341,830). The project hard costs will be capitalized on the Balance Sheet, while the operations/administrative soft costs are included in the budgeted Income Statement.
- Capital Funds aggregating $343,531 are expected for the managed Pagedale, Olivette, and Hillsdale PHAs. The total was allocated between project hard costs ($146,067) and operations/administrative soft costs ($197,464). The project hard costs will be capitalized on the Balance Sheet, while the operations/administrative soft costs are included in the budgeted Income Statement.
- Insurance expenses are based on the Missouri Housing Authorities Property & Casualty, Inc. (MHAPCI) FY 2027 provided premiums.
- PILOT expense calculation is based on 10% of estimated rental income less utilities costs.
- For AMP 1, a net operating income of $152,804 is expected for FY 2027. Including depreciation of $49,785, the net income is $103,019.
- For AMP 2, a net operating deficit of $419,745 is expected for FY 2027. Including depreciation of $99,555, the net loss is $519,300.
- For AMP 4, a net operating deficit of $23,520 is expected for FY 2027. Including depreciation of $40,000, the net loss is $63,520.

VII. COCC

- Fee Income is based on asset management, bookkeeping, and management fees charged to each AMP and program. Additionally, external management fees are received from the managed PHAs. The aggregate amount will be $2,237,334 for FY 2027.
- A net operating income of $216,430 is expected for FY 2027. Including depreciation of $12,000, the net income is 204,430.

VIII. Business Activities

- Income includes rents received from Market Rates, Neighborhood Stabilization Program (NSP), and West County Properties.
- A net operating deficit of $210,007 is expected for FY 2027. But after depreciation expense of $49,925, the net loss is $259,932.
- Management plans to expend approximately $225,000 to develop Peace Place and/or other developments. The $225,000 is expected to be capitalized on the Balance Sheet.

IX. Staff

Department	Full-time	Total FTE
Executive	5	5
Administration	4	4
Finance	4	4
Housing Administration	6	6
Facilities & Maintenance	6	6
HCV	29	29
Inspections	8	8
Total	62	62

X. Attachment

FY 2027 Proposed Budget

County Housing & Managed Public Housing Authorities
FY 2027 Consolidated Operating Budget
Resolution No. 1472

General Ledger Account No	General Ledger Account Description	Grand Total	Sub Total County Housing	COCC	BA	AMP 1	AMP 2	AMP 4	Sub Total County Housing HCV	HCV	MSV	Sub Total Managed PHAs	Pagedale	Olivette	Hillsdale
4000-00-120	OPERATING INCOME														
4000-00-130	Income	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
4000-00-240	Voucher HAP Grants	$ 73,613,569	$ -	$ -	$ -	$ -	$ -	$ -	$ 73,613,569	$ 70,931,574	$ 2,681,995	$ -	$ -	$ -	$ -
4000-10-240	FSS Grant Income	$ 180,000	$ -	$ -	$ -	$ -	$ -	$ -	$ 180,000	$ 180,000		$ -	$ -	$ -	$ -
4000-20-240	HCV Administrative Fees	$ 6,219,750	$ -	$ -	$ -	$ -	$ -	$ -	$ 6,219,750	$ 5,980,912	$ 238,838	$ -	$ -	$ -	$ -
4000-00-940	Total Voucher Grants	$ 80,013,319	$ -	$ -	$ -	$ -	$ -	$ -	$ 80,013,319	$ 77,092,486	$ 2,920,833	$ -	$ -	$ -	$ -
4100-00-140	Operating Subsidy														
4100-00-240	HUD PHA Operating Grants/Subsidy	$ 1,408,481	$ 1,035,667	$ -	$ -	$ 342,495	$ 403,184	$ 289,988	$ -	$ -	$ -	$ 372,814	$ 246,547	$ 45,943	$ 80,324
4200-00-240	Capital Fund Grants - Hard Costs	$ -	$ -	$ -	$ -				$ -	$ -	$ -	$ -			
4210-00-240	Capital Fund Grants - Soft Costs	$ 539,296	$ 341,830	$ -	$ -	$ 208,516	$ 133,314		$ -	$ -	$ -	$ 197,466	$ 120,366	$ 30,364	$ 46,736
4100-10-240	Cares Grant	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
4199-00-940	Total Operating Subsidy	$ 1,947,777	$ 1,377,497	$ -	$ -	$ 551,011	$ 536,498	$ 289,988	$ -	$ -	$ -	$ 570,280	$ 366,913	$ 76,307	$ 127,060
4300-00-140	Tenant Charges														
4300-00-240	Tenant Rent	$ 1,184,258	$ 809,101	$ -	$ 15,660	$ 381,087	$ 300,466	$ 111,888	$ 247	$ 247	$ -	$ 374,910	$ 293,785	$ 49,516	$ 31,609
4310-00-240	Less: Prepaid Rents	$ (592)	$ -	$ -					$ (592)	$ (592)	$ -	$ -			
4320-00-240	Laundry and Vending	$ -	$ -	$ -					$ -	$ -	$ -	$ -			
4325-00-240	Legal Fees - Tenant	$ 8,000	$ 13,000	$ -		$ 5,000	$ 4,000	$ 4,000	$ -	$ -	$ -	$ (5,000)	$ (5,000)		
4330-00-240	Maintenance - Labor	$ 2,600	$ 2,600	$ -			$ 2,600		$ -	$ -	$ -	$ -			
4335-00-240	Maintenance - Materials	$ 6,000	$ 6,000	$ -		$ 1,000	$ 5,000		$ -	$ -	$ -	$ -			
4340-00-240	Misc. Tenant Income	$ 750	$ 750	$ -			$ 750		$ -	$ -	$ -	$ -			
4345-00-240	NSF Charges	$ -	$ -	$ -					$ -	$ -	$ -	$ -	$ -	$ -	$ -
4350-00-240	Repayment Income	$ -	$ -	$ -					$ -	$ -	$ -	$ -	$ -	$ -	$ -
4355-00-240	Tenant Owned Utilities	$ 450	$ 450	$ -		$ 250	$ 200		$ -	$ -	$ -	$ -	$ -	$ -	$ -
4390-00-240	Bad Debt-Tenant Rents	$ (81,528)	$ (52,500)	$ -		$ (7,500)	$ (30,000)	$ (15,000)	$ -		$ -	$ (29,028)	$ (24,000)	$ (2,528)	$ (2,500)
4399-00-940	Total Tenant Charges	$ 1,119,938	$ 779,401	$ -	$ 15,660	$ 379,837	$ 283,016	$ 100,888	$ (345)	$ (345)	$ -	$ 340,882	$ 264,785	$ 46,988	$ 29,109
4400-00-140	Fraud Recovery														
4400-00-240	Fraud Recovery	$ 35,000	$ -	$ -	$ -	$ -	$ -	$ -	$ 35,000	$ 35,000	$ -	$ -	$ -	$ -	$ -
4499-00-940	Total Fraud Recovery	$ 35,000	$ -	$ -	$ -	$ -	$ -	$ -	$ 35,000	$ 35,000	$ -	$ -	$ -	$ -	$ -
4500-00-140	Other Income														
4500-00-150	Investment Income														
4500-00-250	Investment Income - Unrestricted	$ 10,648	$ 5,300	$ 3,000	$ 2,000	$ 200	$ 100	$ -	$ 4,423	$ 3,923	$ 500	$ 925	$ 400	$ 225	$ 300
4520-00-250	Mortgage Interest Income	$ 115,000	$ 115,000		$ 115,000			$ -	$ -			$ -	$ -	$ -	$ -
4525-00-250	Interest Income	$ 50	$ -					$ -	$ 50	$ 50		$ -	$ -	$ -	$ -
4530-00-250	Collection Interest	$ 192	$ -					$ -	$ 192	$ 192		$ -	$ -	$ -	$ -
4599-00-250	Total Investment Income	$ 125,890	$ 120,300	$ 3,000	$ 117,000	$ 200	$ 100	$ -	$ 4,665	$ 4,165	$ 500	$ 925	$ 400	$ 225	$ 300
4600-00-150	Miscellaneous Other Income														
4630-00-250	External Management Fee Income	$ 1,243,951	$ 1,243,951	$ 1,243,951					$ -		$ -	$ -	$ -	$ -	$ -
4640-00-250	FSS Forfeitures	$ -	$ -						$ -		$ -	$ -	$ -	$ -	$ -
4650-00-250	Port in HAP Earned	$ 654,436	$ -						$ 654,436	$ 654,436	$ -	$ -	$ -	$ -	$ -
4660-00-250	Port in HAP Admin Fees	$ 31,573	$ -						$ 31,573	$ 31,573	$ -	$ -	$ -	$ -	$ -
4670-00-250	Miscellaneous Other Income	$ 27,000	$ 675		$ 675				$ 26,325	$ 26,325	$ -	$ -	$ -	$ -	$ -
4690-00-250	Bad Debt Other	$ -	$ -						$ -		$ -	$ -	$ -	$ -	$ -
4699-00-950	Total Miscellaneous Other Income	$ 1,956,960	$ 1,244,626	$ 1,243,951	$ 675	$ -	$ -	$ -	$ 712,334	$ 712,334	$ -	$ -	$ -	$ -	$ -
4900-00-150	Internal Income														
4910-00-250	Asset Mgt Fee	$ 48,946	$ 48,946	$ 48,946	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
4920-00-250	Bookkeeping Mgt Fee	$ 599,210	$ 599,210	$ 599,210	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
4930-00-250	Management Fee Income	$ 210,227	$ 210,227	$ 210,227	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -

County Housing & Managed Public Housing Authorities
FY 2027 Consolidated Operating Budget
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General Ledger Account No	General Ledger Account Description	Grand Total	Sub Total County Housing	COCC	BA	AMP 1	AMP 2	AMP 4	Sub Total County Housing HCV	HCV	MSV	Sub Total Managed PHAs	Pagedale	Olivette	Hillsdale
4940-00-250	Office Rent Income	$ 135,000	$ 135,000	$ 135,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
4997-00-950	Total Internal Income	$ 993,383	$ 993,383	$ 993,383	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
4998-00-940	Total Other Income	$ 3,076,233	$ 2,358,309	$ 2,240,334	$ 117,675	$ 200	$ 100	$ -	$ 716,999	$ 716,499	$ 500	$ 925	$ 400	$ 225	$ 300
4999-00-930	Total Income	$ 86,192,267	$ 4,515,207	$ 2,240,334	$ 133,335	$ 931,048	$ 819,614	$ 390,876	$ 80,764,973	$ 77,843,640	$ 2,921,333	$ 912,087	$ 632,098	$ 123,520	$ 156,469
5000-00-130	EXPENSES														
5000-00-140	Rents and Utility Reimbursements														
5000-00-240	Housing Assistance Payments	$ 68,272,834	$ -	$ -	$ -	$ -	$ -	$ -	$ 68,272,834	$ 65,665,512	$ 2,607,322	$ -	$ -	$ -	$ -
5010-00-240	Tenant Utility Payments	$ 3,750,510	$ -	$ -	$ -	$ -	$ -	$ -	$ 3,750,510	$ 3,694,505	$ 56,005	$ -	$ -	$ -	$ -
5020-00-240	Port-In HAP Expense	$ 91,620	$ -	$ -	$ -	$ -	$ -	$ -	$ 91,620	$ 91,620		$ -	$ -	$ -	$ -
5030-00-240	Portable Out HAP Payments	$ 1,296,355	$ -	$ -	$ -	$ -	$ -	$ -	$ 1,296,355	$ 1,277,687	$ 18,668	$ -	$ -	$ -	$ -
5040-00-240	FSS Escrow Payments	$ 197,157	$ -	$ -	$ -	$ -	$ -	$ -	$ 197,157	$ 197,157		$ -	$ -	$ -	$ -
5050-00-240	Utility Reimbursement	$ 137,682	$ 90,619	$ -	$ -	$ -	$ 70,416	$ 20,203	$ 5,094	$ 5,094		$ 41,969	$ 33,480	$ 1,500	$ 6,989
5999-00-940	Total Rents and Utility Reimbursements	$ 73,746,158	$ 90,619	$ -	$ -	$ -	$ 70,416	$ 20,203	$ 73,613,570	$ 70,931,575	$ 2,681,995	$ 41,969	$ 33,480	$ 1,500	$ 6,989
6000-00-140	Salaries														
6000-00-150	Salaries - Administrative														
6000-00-250	Salaries - Administrative	$ 3,843,786	$ 1,402,507	$ 1,075,830	$ 33,988	$ 92,315	$ 177,295	$ 23,079	$ 2,275,792	$ 2,158,094	$ 117,698	$ 165,487	$ 92,315	$ 30,951	$ 42,221
6099-00-950	Total Salaries - Administrative	$ 3,843,786	$ 1,402,507	$ 1,075,830	$ 33,988	$ 92,315	$ 177,295	$ 23,079	$ 2,275,792	$ 2,158,094	$ 117,698	$ 165,487	$ 92,315	$ 30,951	$ 42,221
6100-00-150	Salaries - Tenant Services														
6100-00-250	Salaries - Tenant Services	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		$ -	$ -	$ -	$ -	$ -
6199-00-950	Total Salaries - Tenant Services	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
6200-00-150	Salaries - Maintenance														
6200-00-250	Salaries - Maintenance	$ 311,790	$ 199,546	$ -	$ -	$ 62,358	$ 121,598	$ 15,590	$ -	$ -	$ -	$ 112,244	$ 62,358	$ 21,825	$ 28,061
6210-00-250	Salaries - Maintenance Overtime	$ 31,169	$ 19,948	$ -	$ -	$ 6,234	$ 12,156	$ 1,558	$ -	$ -	$ -	$ 11,221	$ 6,234	$ 2,182	$ 2,805
6298-00-950	Total Salaries - Maintenance	$ 342,959	$ 219,494	$ -	$ -	$ 68,592	$ 133,754	$ 17,148	$ -	$ -	$ -	$ 123,465	$ 68,592	$ 24,007	$ 30,866
6299-00-940	Total Salaries	$ 4,186,745	$ 1,622,001	$ 1,075,830	$ 33,988	$ 160,907	$ 311,049	$ 40,227	$ 2,275,792	$ 2,158,094	$ 117,698	$ 288,952	$ 160,907	$ 54,958	$ 73,087
6300-00-140	Benefits and Taxes														
6300-00-150	Employee Benefits - Administrative														
6300-00-250	Insurance - Dental - Administrative	$ 35,219	$ 8,397	$ 3,382	$ 113	$ 1,508	$ 2,960	$ 434	$ 24,576	$ 24,576	$ -	$ 2,246			$ 2,246
6305-00-250	Insurance - Health - Administrative	$ 704,544	$ 272,489	$ 116,585	$ 3,070	$ 47,198	$ 92,499	$ 13,137	$ 415,840	$ 415,840	$ -	$ 16,215		$ 16,215	
6310-00-250	Insurance - COBRA - Administrative	$ 37,220	$ 37,220	$ 37,220					$ -		$ -	$ -			
6315-00-250	Insurance - STD - Administrative	$ 19,429	$ 5,717	$ 2,989	$ 161	$ 792	$ 1,546	$ 229	$ 12,020	$ 12,020	$ -	$ 1,692	$ 883	$ 302	$ 507
6320-00-250	Insurance - LTD - Administrative	$ 11,387	$ 3,049	$ 1,413	$ 86	$ 476	$ 933	$ 141	$ 7,361	$ 7,361	$ -	$ 977	$ 510	$ 175	$ 292
6325-00-250	Insurance - Life - Administrative	$ 24,397	$ 9,799	$ 6,998	$ 271	$ 783	$ 1,519	$ 228	$ 13,022	$ 13,022	$ -	$ 1,576	$ 823	$ 281	$ 472
6330-00-250	Insurance - Long-Term - Administrative	$ 455	$ 455	$ 455					$ -		$ -	$ -			
6335-00-250	Insurance - Vision - Administrative	$ 3,117	$ 651		$ 17	$ 194	$ 379	$ 61	$ 2,466	$ 2,466	$ -	$ -			
6345-00-250	Other - Employee Benefit Contribution	$ 6,493	$ 3,345	$ 3,345					$ 3,148	$ 3,148	$ -	$ -			
6350-00-250	Other - Pension - Administrative	$ 318,542	$ 121,861	$ 99,040	$ 1,694	$ 6,644	$ 12,822	$ 1,661	$ 183,387	$ 183,387	$ -	$ 13,294	$ 6,943	$ 2,367	$ 3,984
6355-00-250	Other - Tuition Reimbursement - Administrative	$ -	$ -						$ -		$ -	$ -			
6365-00-250	Taxes - FICA - Administrative	$ 294,049	$ 107,292	$ 82,301	$ 2,600	$ 7,062	$ 13,563	$ 1,766	$ 174,098	$ 165,094	$ 9,004	$ 12,659	$ 7,062	$ 2,367	$ 3,230
6370-00-250	Taxes - Unemployment - Administrative	$ 16,296	$ 4,263	$ 3,202	$ 78	$ 309	$ 597	$ 77	$ 11,093	$ 11,093	$ -	$ 940	$ 491	$ 167	$ 282
6399-00-950	Total Employee Benefits - Administrative	$ 1,471,148	$ 574,538	$ 356,930	$ 8,090	$ 64,966	$ 126,818	$ 17,734	$ 847,011	$ 838,007	$ 9,004	$ 49,599	$ 16,712	$ 21,874	$ 11,013
6400-00-150	Employee Benefits - Tenant Services														
6400-00-250	Insurance - Dental - Tenant Services	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
6405-00-250	Insurance - Health - Tenant Services	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
6435-00-250	Insurance - Vision - Tenant Services	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -

County Housing & Managed Public Housing Authorities
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General Ledger Account No	General Ledger Account Description	Grand Total	Sub Total County Housing	COCC	BA	AMP 1	AMP 2	AMP 4	Sub Total County Housing HCV	HCV	MSV	Sub Total Managed PHAs	Pagedale	Olivette	Hillsdale
6450-00-250	Other - Pension - Tenant Services	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		$ -	$ -	$ -	$ -	$ -
6465-00-250	Taxes - FICA - Tenant Services	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -		$ -	$ -	$ -	$ -	$ -
6470-00-250	Taxes - Unemployment - Tenant Services	$ 65	$ -	$ -	$ -	$ -	$ -	$ -	$ 65	$ 65	$ -	$ -	$ -	$ -	$ -
6499-00-950	Total Employee Benefits - Tenant Services	$ 65	$ -	$ -	$ -	$ -	$ -	$ -	$ 65	$ 65	$ -	$ -	$ -	$ -	$ -
6500-00-150	Employee Benefits - Maintenance														
6500-00-250	Insurance - Dental - Maintenance	$ 3,514	$ -						$ -	$ -	$ -	$ 3,514	$ 1,268		$ 2,246
6505-00-250	Insurance - Health - Maintenance	$ 54,311	$ -						$ -	$ -	$ -	$ 54,311	$ 45,190		$ 9,121
6535-00-250	Insurance - Vision - Maintenance	$ 184	$ -						$ -	$ -	$ -	$ 184	$ 184		
6550-00-250	Other - Pension - Maintenance	$ 22,814	$ 14,300			$ 3,864	$ 7,771	$ 2,665	$ -	$ -	$ -	$ 8,514	$ 4,599	$ 1,482	$ 2,433
6565-00-250	Taxes - FICA - Maintenance	$ 26,236	$ 16,791			$ 5,247	$ 10,232	$ 1,312	$ -	$ -	$ -	$ 9,445	$ 5,247	$ 1,837	$ 2,361
6570-00-250	Taxes - Unemployment - Maintenance	$ 1,774	$ 1,092			$ 198	$ 894		$ -	$ -	$ -	$ 682	$ 383	$ 112	$ 187
6598-00-950	Total Employee Benefits - Maintenance	$ 108,833	$ 32,183	$ -	$ -	$ 9,309	$ 18,897	$ 3,977	$ -	$ -	$ -	$ 76,650	$ 56,871	$ 3,431	$ 16,348
6599-00-940	Total Benefits and Taxes	$ 1,580,046	$ 606,721	$ 356,930	$ 8,090	$ 74,275	$ 145,715	$ 21,711	$ 847,076	$ 838,072	$ 9,004	$ 126,249	$ 73,583	$ 25,305	$ 27,361
6600-00-140	Other Employee Costs														
6610-00-240	Drug Screening	$ -	$ -						$ -	$ -	$ -	$ -	$ -	$ -	$ -
6650-00-240	Employee Welfare	$ -	$ -						$ -	$ -	$ -	$ -	$ -	$ -	$ -
6690-00-240	Other Misc Employee Costs	$ 5,752	$ 4,649	$ 263	$ 4,175	$ 70	$ 123	$ 18	$ 980	$ 980	$ -	$ 123	$ 70	$ 18	$ 35
6699-00-940	Total Other Employee Costs	$ 5,752	$ 4,649	$ 263	$ 4,175	$ 70	$ 123	$ 18	$ 980	$ 980	$ -	$ 123	$ 70	$ 18	$ 35
6700-00-140	Training, Seminars, Conferences														
6710-00-240	Training - Board	$ 12,000	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 12,000	$ 12,000		
6720-00-240	Training - Administration	$ 22,400	$ 8,288	$ 3,360	$ 2,240	$ 896	$ 1,568	$ 224	$ 12,544	$ 12,544	$ -	$ 1,568	$ 896	$ 224	$ 448
6730-00-240	Training - Maintenance	$ -	$ -			$ -	$ -	$ -	$ -	$ -	$ -	$ -			
6799-00-940	Total Training, Seminars, Conferences	$ 34,400	$ 8,288	$ 3,360	$ 2,240	$ 896	$ 1,568	$ 224	$ 12,544	$ 12,544	$ -	$ 13,568	$ 12,896	$ 224	$ 448
7000-00-140	Occupancy														
7000-00-150	Utilities														
7000-00-250	Electricity	$ 7,882	$ 7,882			$ 7,500	$ 79	$ 303	$ -	$ -	$ -	$ -	$ -	$ -	$ -
7005-00-250	Electricity-Vacant Units	$ 40,028	$ 32,828		$ 483	$ 1,800	$ 14,546	$ 15,999	$ -	$ -	$ -	$ 7,200	$ 4,800	$ 1,800	$ 600
7010-00-250	Electricity - Office	$ 47,564	$ 47,564	$ 45,079			$ 2,485		$ -	$ -	$ -	$ -			
7015-00-250	Gas	$ 56,000	$ 56,000			$ 38,000	$ 18,000		$ -	$ -	$ -	$ -			
7020-00-250	Gas - Vacant Units	$ 26,728	$ 17,028		$ 552			$ 16,476	$ -	$ -	$ -	$ 9,700	$ 6,720	$ 1,080	$ 1,900
7025-00-250	Gas - Office	$ -	$ -						$ -	$ -	$ -	$ -			
7030-00-250	Sewer	$ 269,365	$ 184,982	$ 583	$ 787	$ 35,642	$ 105,974	$ 41,996	$ -	$ -	$ -	$ 84,383	$ 58,000	$ 11,454	$ 14,929
7035-00-250	Sewer - Office	$ 3,201	$ 3,201	$ 1,795			$ 463	$ 943	$ -	$ -	$ -	$ -			
7040-00-250	Water	$ 48,042	$ 48,042	$ 1,110		$ 40,000	$ 4,000	$ 2,932	$ -	$ -	$ -	$ -			
7045-00-250	Water - Vacant Units	$ 53,956	$ 50,356	$ 7,896	$ 180			$ 42,280	$ -	$ -	$ -	$ 3,600	$ 2,880		$ 720
7050-00-250	Water - Office	$ 1,197	$ 1,197	$ 1,197					$ -	$ -	$ -	$ -	$ -	$ -	$ -
7055-00-250	Set Up Fee	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
7099-00-950	Total Utilities	$ 553,963	$ 449,080	$ 57,660	$ 2,002	$ 122,942	$ 145,547	$ 120,929	$ -	$ -	$ -	$ 104,883	$ 72,400	$ 14,334	$ 18,149
7100-00-150	Materials														
7100-00-250	Maintenance Paper/Supplies	$ -	$ -						$ -	$ -	$ -	$ -			
7105-00-250	Supplies - Appliance	$ -	$ -						$ -	$ -	$ -	$ -			
7110-00-250	Supplies - Decorating	$ -	$ -						$ -	$ -	$ -	$ -			
7115-00-250	Supplies - Electrical	$ -	$ -						$ -	$ -	$ -	$ -			
7120-00-250	Supplies - Exterminating	$ -	$ -						$ -	$ -	$ -	$ -			
7125-00-250	Supplies - Grounds	$ -	$ -						$ -	$ -	$ -	$ -			
7130-00-250	Supplies - Janitorial/Cleaning	$ 15,164	$ 6,838	$ 138			$ 1,000	$ 5,700	$ -	$ -	$ -	$ 8,326	$ 600	$ 7,000	$ 726
7135-00-250	Supplies - Maintenance / Repairs	$ 163,145	$ 100,145	$ 8,145	$ 2,000	$ 30,000	$ 45,000	$ 15,000	$ -	$ -	$ -	$ 63,000	$ 50,000	$ 8,000	$ 5,000
7140-00-250	Supplies - Plumbing	$ -	$ -						$ -	$ -	$ -	$ -			

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7145-00-250	Tools and Equipment	$ -	$ -						$ -	$ -	$ -	$ -			
7199-00-950	Total Materials	$ 178,309	$ 106,983	$ 8,283	$ 2,000	$ 30,000	$ 46,000	$ 20,700	$ -	$ -	$ -	$ 71,326	$ 50,600	$ 15,000	$ 5,726
7200-00-150	Contract Costs														
7200-00-250	Contract - Trash	$ 72,188	$ 29,667	$ 5,116	$ 976	$ 10,925	$ 2,318	$ 10,332	$ -	$ -	$ -	$ 42,521	$ 33,000	$ 2,921	$ 6,600
7205-00-250	Contract - HVAC	$ 13,960	$ 7,720	$ 300	$ 200	$ 80	$ 140	$ 7,000	$ 1,120	$ 1,120	$ -	$ 5,120	$ 80	$ 20	$ 5,020
7210-00-250	Contract - Snow Removal	$ 253,900	$ 93,943	$ 38,085	$ 25,390	$ 10,156	$ 17,773	$ 2,539	$ 142,184	$ 142,184	$ -	$ 17,773	$ 10,156	$ 2,539	$ 5,078
7215-00-250	Contract - Elevator Monitoring	$ 12,181	$ 4,507	$ 1,827	$ 1,218	$ 487	$ 853	$ 122	$ 6,821	$ 6,821	$ -	$ 853	$ 487	$ 122	$ 244
7220-00-250	Contract - Grounds	$ 82,600	$ 27,713	$ 11,235	$ 7,490	$ 2,996	$ 5,243	$ 749	$ 42,287	$ 42,287	$ -	$ 12,600	$ 11,200	$ 1,400	
7225-00-250	Contract - Unit Repair	$ 95,936	$ 19,936	$ 1,936	$ 3,000	$ 15,000	$ -	$ -	$ -		$ -	$ 76,000	$ 60,000	$ 6,000	$ 10,000
7230-00-250	Contract - Electrical	$ 11,395	$ 11,395	$ 1,092		$ 3,303	$ 6,000	$ 1,000	$ -		$ -	$ -			
7235-00-250	Contract - Plumbing	$ 44,681	$ 37,181	$ 3,871	$ 500	$ 17,810	$ 10,000	$ 5,000	$ -		$ -	$ 7,500	$ 6,000	$ 1,500	
7240-00-250	Contract - Pest Control	$ 42,964	$ 30,564	$ 1,284		$ 14,400	$ 12,000	$ 2,880	$ -		$ -	$ 12,400	$ 12,400		
7245-00-250	Contract - Janitorial/Cleaning	$ 13,637	$ 5,399	$ 2,189	$ 1,459	$ 584	$ 1,021	$ 146	$ 8,238	$ 8,238	$ -	$ -			
7250-00-250	Contract - Routine Maintenance	$ 3,300	$ 3,300				$ 3,300		$ -		$ -	$ -			
7255-00-250	Contract - Alarm Monitoring	$ 6,617	$ 6,617	$ 2,777		$ 3,240	$ 600		$ -		$ -	$ -			
7260-00-250	Contract - Alarm/Extinguisher	$ 1,375	$ 1,375	$ 975		$ 200		$ 200	$ -		$ -	$ -			
7265-00-250	Contract - Building Repairs	$ 316,000	$ 125,104	$ 50,718	$ 33,812	$ 13,525	$ 23,668	$ 3,381	$ 190,896	$ 190,896	$ -	$ -			
7270-00-250	Contract - Carpet Cleaning	$ 6,798	$ 2,691	$ 1,091	$ 727	$ 291	$ 509	$ 73	$ 4,107	$ 4,107	$ -	$ -			
7275-00-250	Contract - Consultants	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
7280-00-250	Contract - Floor Covering	$ 6,000	$ 5,000	$ -	$ -	$ 2,000	$ 2,000	$ 1,000	$ -	$ -	$ -	$ 1,000	$ 500	$ 500	
7285-00-250	Contract - Maintenance Consultants	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			
7290-00-250	Contract - Other Costs	$ 11,000	$ 10,000	$ -	$ -	$ -	$ 10,000	$ -	$ -	$ -	$ -	$ 1,000	$ 1,000		
7299-00-950	Total Contract Costs	$ 994,532	$ 422,112	$ 122,496	$ 74,772	$ 94,997	$ 95,425	$ 34,422	$ 395,653	$ 395,653	$ -	$ 176,767	$ 134,823	$ 15,002	$ 26,942
7300-00-150	Tenant Services Expense														
7310-00-250	Other Tenant Services	$ 5,984	$ 4,984	$ -	$ -	$ 1,457	$ 3,527	$ -	$ -	$ -	$ -	$ 1,000	$ 1,000		
7330-00-250	Tenant Relocation	$ 2,725	$ 1,725	$ -	$ -	$ -	$ 1,725	$ -	$ -			$ 1,000	$ 1,000	$ -	$ -
7370-00-250	Tenant Application Fees	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			$ -	$ -	$ -	$ -
7380-00-250	Tenant Property Owner Incentive	$ 100,000	$ -	$ -	$ -	$ -	$ -	$ -	$ 100,000	$ 100,000		$ -	$ -	$ -	$ -
7385-00-250	Tenant Security Deposits	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -			$ -	$ -	$ -	$ -
7399-00-950	Total Tenant Services Expense	$ 108,709	$ 6,709	$ -	$ -	$ 1,457	$ 5,252	$ -	$ 100,000	$ 100,000	$ -	$ 2,000	$ 2,000	$ -	$ -
7400-00-150	Other Maintenance Expenses														
7400-00-250	Maintenance Uniforms	$ -	$ -						$ -	$ -	$ -	$ -			
7410-00-250	Inspection Uniforms	$ -	$ -						$ -	$ -	$ -	$ -			
7410-00-250	Maintenance Personnel Mileage	$ -	$ -						$ -	$ -	$ -	$ -			
7420-00-250	Vehicle Maintenance	$ 6,900	$ 2,553	$ 1,035	$ 690	$ 276	$ 483	$ 69	$ 3,864	$ 3,864	$ -	$ 483	$ 276	$ 69	$ 138
7430-00-250	Contract Vehicle Maintenance	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
7499-00-950	Total Other Maintenance Expenses	$ 6,900	$ 2,553	$ 1,035	$ 690	$ 276	$ 483	$ 69	$ 3,864	$ 3,864	$ -	$ 483	$ 276	$ 69	$ 138
7600-00-150	Other Occupancy Expenses														
7600-00-250	Extraordinary Maintenance	$ -	$ -						$ -	$ -	$ -	$ -	$ -	$ -	$ -
7630-00-250	Payments in Lieu of Taxes	$ 60,625	$ 39,625			$ 15,662	$ 20,205	$ 3,758	$ -	$ -	$ -	$ 21,000	$ 16,000	$ 3,500	$ 1,500
7640-00-250	Security/Law Enforcement	$ 130,410	$ 48,252	$ 19,562	$ 13,041	$ 5,216	$ 9,129	$ 1,304	$ 73,030	$ 73,030	$ -	$ 9,128	$ 5,216	$ 1,304	$ 2,608
7699-00-950	Total Other Occupancy Expenses	$ 191,035	$ 87,877	$ 19,562	$ 13,041	$ 20,878	$ 29,334	$ 5,062	$ 73,030	$ 73,030	$ -	$ 30,128	$ 21,216	$ 4,804	$ 4,108
7999-00-940	Total Occupancy	$ 2,033,448	$ 1,075,314	$ 209,036	$ 92,505	$ 270,550	$ 322,041	$ 181,182	$ 572,547	$ 572,547	$ -	$ 385,587	$ 281,315	$ 49,209	$ 55,063
8000-00-140	Other Admin Expenses														
8000-00-150	Insurance														
8000-00-250	Insurance - Automobile	$ 8,506	$ 5,950	$ 5,950	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 2,556	$ 1,017	$ 760	$ 779
8010-00-250	Insurance - Liability	$ 56,893	$ 33,719	$ 10,885		$ 8,872	$ 9,308	$ 4,654	$ -	$ -	$ -	$ 23,174	$ 17,865	$ 2,384	$ 2,925
8020-00-250	Insurance - Property	$ 566,726	$ 396,868	$ 70,634		$ 91,663	$ 163,227	$ 71,344	$ 37,221	$ 37,221	$ -	$ 132,637	$ 105,898	$ 12,785	$ 13,954

County Housing & Managed Public Housing Authorities
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General Ledger Account No	General Ledger Account Description	Grand Total	Sub Total County Housing	COCC	BA	AMP 1	AMP 2	AMP 4	Sub Total County Housing HCV	HCV	MSV	Sub Total Managed PHAs	Pagedale	Olivette	Hillsdale
8030-00-250	Insurance - Worker's Comp	$ 27,191	$ 22,537	$ 13,585	$ -	$ 2,984	$ 5,701	$ 267	$ -		$ -	$ 4,654	$ 2,555	$ 639	$ 1,460
8099-00-950	Total Insurance	$ 659,316	$ 459,074	$ 101,054	$ -	$ 103,519	$ 178,236	$ 76,265	$ 37,221	$ 37,221	$ -	$ 163,021	$ 127,335	$ 16,568	$ 19,118
8100-00-150	Outside Services														
8100-00-250	Consultants	$ 210,845	$ 109,254	$ 24,022	$ 66,015	$ 6,406	$ 11,210	$ 1,601	$ 90,381	$ 90,381	$ -	$ 11,210	$ 6,406	$ 1,601	$ 3,203
8100-20-250	Development - Peace Place	$ -	$ -		$ -				$ -			$ -			
8110-00-250	Temporary Administrative Labor	$ 20,200	$ 7,474	$ 3,030	$ 2,020	$ 808	$ 1,414	$ 202	$ 11,312	$ 11,312	$ -	$ 1,414	$ 808	$ 202	$ 404
8199-00-950	Total Outside Services	$ 231,045	$ 116,728	$ 27,052	$ 68,035	$ 7,214	$ 12,624	$ 1,803	$ 101,693	$ 101,693	$ -	$ 12,624	$ 7,214	$ 1,803	$ 3,607
8200-00-150	Professional Fees														
8200-00-250	Professional Fees - Legal	$ 153,360	$ 66,193	$ 20,754	$ 28,836	$ 5,534	$ 9,685	$ 1,384	$ 77,482	$ 77,482	$ -	$ 9,685	$ 5,534	$ 1,384	$ 2,767
8210-00-250	Professional Fees - Accounting	$ 275,000	$ 101,750	$ 41,250	$ 27,500	$ 11,000	$ 19,250	$ 2,750	$ 154,000	$ 154,000	$ -	$ 19,250	$ 11,000	$ 2,750	$ 5,500
8220-00-250	Professional Fees - Audit	$ 91,000	$ 27,713	$ 11,235	$ 7,490	$ 2,996	$ 5,243	$ 749	$ 42,287	$ 42,287	$ -	$ 21,000	$ 7,000	$ 7,000	$ 7,000
8299-00-950	Total Professional Fees	$ 519,360	$ 195,656	$ 73,239	$ 63,826	$ 19,530	$ 34,178	$ 4,883	$ 273,769	$ 273,769	$ -	$ 49,935	$ 23,534	$ 11,134	$ 15,267
8300-00-150	Other Fees														
8300-00-250	Bank Fees	$ 42,819	$ 41,819	$ 38,404		$ 1,049	$ 1,736	$ 630	$ -	$ -	$ -	$ 1,000	$ 750	$ 250	
8310-00-250	Collection Fees	$ -	$ -						$ -		$ -	$ -			
8320-00-250	Management Fee - County Housing	$ 78,748	$ -						$ -		$ -	$ 78,748	$ 54,518	$ 9,423	$ 14,807
8330-00-250	Payroll Processing Fees	$ 19,564	$ 19,564	$ 19,564					$ -		$ -	$ -			
8340-00-250	Late Fees	$ 5,858	$ 5,838	$ 266		$ 1,594	$ 3,685	$ 293	$ 20	$ 20	$ -	$ -			
8360-00-250	Tenant Screening	$ 35,932	$ 2,711			$ 985	$ 1,152	$ 574	$ 31,871	$ 31,871	$ -	$ 1,350	$ 1,200		$ 150
8370-00-250	Miscellaneous Fees	$ 610	$ 226	$ 92	$ 61	$ 24	$ 43	$ 6	$ 342	$ 342	$ -	$ 42	$ 24	$ 6	$ 12
8399-00-950	Total Other Fees	$ 183,531	$ 70,158	$ 58,326	$ 61	$ 3,652	$ 6,616	$ 1,503	$ 32,233	$ 32,233	$ -	$ 81,140	$ 56,492	$ 9,679	$ 14,969
8400-00-150	Telephone and Technology														
8400-00-250	Computer Parts	$ 27,000	$ 9,990	$ 4,050	$ 2,700	$ 1,080	$ 1,890	$ 270	$ 15,120	$ 15,120	$ -	$ 1,890	$ 1,080	$ 270	$ 540
8410-00-250	Contract - Answer Service	$ 4,174	$ 3,754			$ 1,449	$ 1,477	$ 828	$ -		$ -	$ 420			$ 420
8420-00-250	Contract - IT Contracts	$ 184,904	$ 68,414	$ 27,736	$ 18,490	$ 7,396	$ 12,943	$ 1,849	$ 103,547	$ 103,547	$ -	$ 12,943	$ 7,396	$ 1,849	$ 3,698
8430-00-250	Internet	$ 4,800	$ 1,776	$ 720	$ 480	$ 192	$ 336	$ 48	$ 2,688	$ 2,688	$ -	$ 336	$ 192	$ 48	$ 96
8440-00-250	Small Office Equipment	$ 7,076	$ 2,618	$ 1,061	$ 708	$ 283	$ 495	$ 71	$ 3,962	$ 3,962	$ -	$ 496	$ 283	$ 71	$ 142
8450-00-250	Software/License Fees	$ 278,399	$ 103,008	$ 41,760	$ 27,840	$ 11,136	$ 19,488	$ 2,784	$ 155,903	$ 155,903	$ -	$ 19,488	$ 11,136	$ 2,784	$ 5,568
8460-00-250	Telephone	$ 77,600	$ 28,712	$ 11,640	$ 7,760	$ 3,104	$ 5,432	$ 776	$ 43,456	$ 43,456	$ -	$ 5,432	$ 3,104	$ 776	$ 1,552
8499-00-950	Total Telephone and Technology	$ 583,953	$ 218,272	$ 86,967	$ 57,978	$ 24,640	$ 42,061	$ 6,626	$ 324,676	$ 324,676	$ -	$ 41,005	$ 23,191	$ 5,798	$ 12,016
8500-00-150	Other Administrative Expenses														
8504-00-250	Advertising	$ -	$ -						$ -	$ -	$ -	$ -	$ -	$ -	$ -
8505-00-250	Communication	$ -	$ -						$ -	$ -	$ -	$ -	$ -	$ -	
8508-00-250	Copiers/Printers	$ 15,000	$ 5,550	$ 2,250	$ 1,500	$ 600	$ 1,050	$ 150	$ 8,400	$ 8,400	$ -	$ 1,050	$ 600	$ 150	$ 300
8512-00-250	Donations	$ -	$ -						$ -		$ -	$ -			
8516-00-250	Dues/subscriptions	$ -	$ -						$ -		$ -	$ -			
8524-00-250	Inspections	$ 9,890	$ 3,271	$ 1,326	$ 884	$ 354	$ 619	$ 88	$ 4,950	$ 4,950	$ -	$ 1,669	$ 1,404	$ 88	$ 177
8540-00-250	Meetings	$ 13,181	$ 13,181	$ 13,181					$ -		$ -	$ -			
8544-00-250	Membership/Publications	$ 2,100	$ 777	$ 315	$ 210	$ 84	$ 147	$ 21	$ 1,176	$ 1,176	$ -	$ 147	$ 84	$ 21	$ 42
8548-00-250	Office Supplies	$ 33,040	$ 12,225	$ 4,956	$ 3,304	$ 1,322	$ 2,313	$ 330	$ 18,502	$ 18,502	$ -	$ 2,313	$ 1,322	$ 330	$ 661
8556-00-250	Port Out Admin Expenses	$ 63,511	$ -						$ 63,511	$ 63,511	$ -	$ -			
8560-00-250	Postage / Delivery	$ 13,000	$ 4,810	$ 1,950	$ 1,300	$ 520	$ 910	$ 130	$ 7,280	$ 7,280	$ -	$ 910	$ 520	$ 130	$ 260
8564-00-250	Printer Supplies	$ -	$ -						$ -		$ -	$ -			
8576-00-250	Travel	$ 185	$ -						$ 185	$ 185	$ -	$ -			
8580-00-250	Other Misc. Admin Expenses	$ 52,460	$ 19,410	$ 7,869	$ 5,246	$ 2,098	$ 3,672	$ 525	$ 29,378	$ 29,378	$ -	$ 3,672	$ 2,098	$ 525	$ 1,049
8599-00-950	Total Other Administrative Expenses	$ 202,367	$ 59,224	$ 31,847	$ 12,444	$ 4,978	$ 8,711	$ 1,244	$ 133,382	$ 133,382	$ -	$ 9,761	$ 6,028	$ 1,244	$ 2,489
8900-00-150	Internal Charges														
8910-00-250	Asset Mgt Fee Expense	$ 48,946	$ 35,608	$ -	$ -	$ 14,112	$ 13,852	$ 7,644	$ -	$ -	$ -	$ 13,338	$ 9,234	$ 1,596	$ 2,508

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General Ledger Account No	General Ledger Account Description	Grand Total	Sub Total County Housing	COCC	BA	AMP 1	AMP 2	AMP 4	Sub Total County Housing HCV	HCV	MSV	Sub Total Managed PHAs	Pagedale	Olivette	Hillsdale
8920-00-250	Bookkeeping Management Fee Expense	$ 599,210	$ 26,706	$ -	$ -	$ 10,584	$ 10,389	$ 5,733	$ 562,500	$ 540,900	$ 21,600	$ 10,004	$ 6,926	$ 1,197	$ 1,881
8930-00-250	Management Fee Expense	$ 1,454,178	$ 210,227	$ -	$ -	$ 83,317	$ 81,780	$ 45,130	$ 1,243,951	$ 1,196,183	$ 47,768	$ -	$ -	$ -	$ -
8940-00-250	Office Rent Expense	$ 135,000	$ -	$ -	$ -	$ -	$ -	$ -	$ 135,000	$ 135,000		$ -	$ -	$ -	$ -
8996-00-950	Total Internal Charges	$ 2,237,334	$ 272,541	$ -	$ -	$ 108,013	$ 106,021	$ 58,507	$ 1,941,451	$ 1,872,083	$ 69,368	$ 23,342	$ 16,160	$ 2,793	$ 4,389
8997-00-940	Total Other Administrative Expenses	$ 4,616,906	$ 1,391,653	$ 378,485	$ 202,344	$ 271,546	$ 388,447	$ 150,831	$ 2,844,425	$ 2,775,057	$ 69,368	$ 380,828	$ 259,954	$ 49,019	$ 71,855
8998-00-930	TOTAL EXPENSES	$ 86,203,455	$ 4,799,245	$ 2,023,904	$ 343,342	$ 778,244	$ 1,239,359	$ 414,396	$ 80,166,934	$ 77,288,869	$ 2,878,065	$ 1,237,276	$ 822,205	$ 180,233	$ 234,838
8999-00-920	Operating Income	$ (11,188)	$ (284,038)	$ 216,430	$ (210,007)	$ 152,804	$ (419,745)	$ (23,520)	$ 598,039	$ 554,771	$ 43,268	$ (325,189)	$ (190,107)	$ (56,713)	$ (78,369)
9000-00-120	NON-OPERATING ITEMS														
9000-00-130	Depreciation Expense														
	Capital Funds to be capitalized on Balance Sheet	$ -	$ -						$ -			$ -			
9000-00-230	Depreciation Expense	$ 371,884	$ 251,265	$ 12,000	$ 49,925	$ 49,785	$ 99,555	$ 40,000	$ -	$ -	$ -	$ 120,619	$ 85,000	$ 2,584	$ 33,035
9099-00-930	Total Depreciation Expense	$ 371,884	$ 251,265	$ 12,000	$ 49,925	$ 49,785	$ 99,555	$ 40,000	$ -	$ -	$ -	$ 120,619	$ 85,000	$ 2,584	$ 33,035
9997-00-920	TOTAL NON-OPERATING ITEMS	$ 371,884	$ 251,265	$ 12,000	$ 49,925	$ 49,785	$ 99,555	$ 40,000	$ -	$ -	$ -	$ 120,619	$ 85,000	$ 2,584	$ 33,035
9998-00-910	NET INCOME (LOSS)	$ (383,072)	$ (535,303)	$ 204,430	$ (259,932)	$ 103,019	$ (519,300)	$ (63,520)	$ 598,039	$ 554,771	$ 43,268	$ (445,808)	$ (275,107)	$ (59,297)	$ (111,404)

MEMORANDUM

To: County Housing Board of Commissioners

Through: Shannon Koenig, Executive Director and CEO

From: Kawanna Tate, Director, Housing Administration

Date: November 10, 2026

Subject: *Public Housing Performance*

This memo describes recent public housing activities within the framework of the Public Housing Assessment System.

I. PASS – projected 35/40 points

The purpose of PASS is to determine whether public housing units are decent, safe, sanitary and in good repair, and to determine the level to which the PHA is maintaining its public housing in accordance with housing condition standards.

A. Maintenance Activity

The maintenance team completed 93 work orders in September and October and rehabilitated 23 vacant units at Highview, Fee Fee Manor, and Villa Lago. Twenty additional rehabilitations are in progress.

B. NSPIRE Inspection

We had a HUD NSPIRE inspection for Arbor Hill on September 18, 2026. HUD issued a score of 81.

II. MASS – projected 8/25 points

The purpose of the management operations indicator is to assess the AMP's and PHA's management operations capabilities.

Sub-Indicator	Performance	Points
Occupancy	77.4%	0/16
Accounts Payable Ratio	0.59	3/4
Tenant Accounts Receivable	(12.23%) *	5/5
Projected Points		**8/25**

*The negative balance may reflect tenant credits, payments postings, rent adjustments, or other accounting or reporting entries. The underlying balance is being reviewed to determine the cause and confirm the accuracy of the reported amount.

III. FASS – projected 7.21/25 points

The purpose of the financial condition indicator is to measure the financial condition of each public housing project. The reporting period is through August 31, 2026.

Housing Authority	QR	MENAR	DSCR	*Projected Points
County	3/12	3.67/11	2/2	**7.21**

*Score is weighted

Quick Ratio (QR) – Measures liquidity and current assets. The maximum points assigned for this sub-indicator is 12 points.

Months Expendable Net Ratio (MENAR) – Measures the adequacy of the financial reserves by determining the number of months of operation using the net available resources. The maximum points assigned for this sub-indicator is 11 points.

Debt Service Coverage Ratio (DSCR) – Measures capacity to cover debt obligations through the ability to meet regular debt obligations. The maximum points assigned for this sub-indicator is 2 points.

IV. CFP – 10/10 projected points

The purpose of the Capital Fund program assessment is to identify how long it takes a PHA to obligate the funds provided to it from the Capital Fund program.

A. Capital Grant Fund Progress

Grant Year	Amount	Obligated	Expended	Deadline to expend
2019	$1,120,718	100%	100%	4/15/25
2020	$1,650,401	100%	100%	3/25/26
2021	$1,726,055	100%	100%	2/22/25
2022	$1,732,441	100%	100%	5/11/26
2023	$1,741,259	100%	60%	2/16/27
2024	$1,614,796	100%	40%	5/5/28
2025	$940,397	35%	35%	5/12/29

B. Project Updates

Projects currently in progress include bathroom renovations at Fee Fee and floor tile replacement at South County.

Scheduled projects include common hallway floor tile replacement and painting at Fee Fee, as well as kitchen renovations at South County.

V. Projected Overall PHAS Score

PASS – 35/40 points
MASS – 8/25 points
FASS – 7.21/25 points
CFP – 10/10 points

Total 60.21 – *Sub-Standard Performer*

VI. Occupancy Alignment

In September, two County Housing residents moved from a two bedroom to a one bedroom within County Housing.

In November, two residents from another housing authority will move from a two bedroom to a one bedroom in County Housing. Another resident will move from a three bedroom to a four bedroom in County Housing. This will conclude the occupancy alignment moves.

We continue to pull from all waitlists that County Housing manages.

MEMORANDUM

To: County Housing Board of Commissioners

Through: Shannon Koenig, Executive Director and CEO

From: Nicole Alexander, Director, Housing Choice Voucher Program

Date: November 10, 2026

Subject: *Housing Choice Administrative Plan Revisions, Resolution No. 1471*

The proposed Administrative Plan revisions clarify County Housing policy and incorporate HUD-authorized flexibility to support efficient and compliant program administration.

I. Recommendation

Staff recommend that the Board approve the proposed Administrative Plan revisions clarifying County Housing policies outlined below.

II. Background

The Housing Choice Voucher (HCV) Administrative Plan establishes the policies and procedures governing program administration. The proposed amendments are intended to clarify existing operational practices and align County Housing policies with available HUD flexibility. These revisions do not alter the agency's overall compliance obligations but provide additional clarity regarding asset limitation reviews and Project-Based Voucher (PBV) inspection requirements.

III. Administrative Plan Revisions

A. Asset Limitations Administrative Plan Updates (see attached Chapter 11, p. 11-3)

i. Current Policy:

The Administrative Plan currently incorporates HUD asset limitation requirements and requires compliance with federal restrictions related to net family assets and ownership of real property. However, the plan does not specifically state when County Housing will evaluate these requirements during the certification process.

ii. Proposed Revision:

This revision clarifies that County Housing will determine compliance with HUD asset limitation requirements at the time of initial eligibility and admission to the Housing Choice Voucher Program. Asset limitation reviews will not be conducted during annual or interim reexaminations, which will reduce administrative burden while maintaining compliance with HUD requirements. All household assets will continue to be fully verified and reviewed during the intake certification process.

B. Project-Based Voucher (PBV) Inspection Requirement Updates (see attached Chapter 17, pgs. 17-18, 17-26)

i. Current Policy:

The Administrative Plan requires PBV units to meet HUD inspection requirements before assistance can commence but does not specifically address the use of HUD's NSPIRE Non-Life-Threatening (NLT) Deficiency option.

ii. Proposed Revision:

This revision updates the Project-Based Voucher (PBV) Administrative Plan to adopt HUD's Non-Life-Threatening (NLT) Deficiency option under the NSPIRE inspection model. Under this policy, the Housing Authority may execute Housing Assistance Payment (HAP) contracts and commence subsidy payments for units that have only non-life-threatening deficiencies, provided no life-threatening deficiencies exist and all identified deficiencies are corrected within HUD-required timeframes. This change provides greater operational flexibility, supports timely lease-up of PBV units, and maintains resident health and safety standards while ensuring owner accountability for required repairs.

Chapter 11

REEXAMINATIONS

INTRODUCTION

County Housing is required to reexamine each family's income and composition at least annually and to adjust the family's level of assistance accordingly. Interim reexaminations are also needed in certain situations. This chapter discusses both annual and interim reexaminations, and the recalculation of family share and subsidy that occurs as a result. HUD regulations and County Housing policies concerning reexaminations are presented in three parts:

Part I: Annual Reexaminations. This part discusses the process for conducting annual reexaminations. County Housing's policy regarding non-enforcement of the asset limitation at annual and interim reexaminations is set forth in Section 11-I.C. of this chapter and applies to both types of reexamination (annual and Interim).

Part II: Interim Reexaminations. This part details the requirements for families to report changes in family income and composition between annual reexaminations.

Part III: Recalculating Family Share and Subsidy Amount. This part discusses the recalculation of family share and subsidy amounts based on the results of annual and interim reexaminations.

Part IV: Non-Interim Reexamination Transaction. This part describes transactions that do not entail changes to the family's adjusted income.

Policies governing reasonable accommodation, family privacy, required family cooperation, and program abuse, as described elsewhere in this plan, apply to both annual and interim reexaminations.

PART I: ANNUAL REEXAMINATIONS [24 CFR 982.516]

11-I.A. OVERVIEW

County Housing must conduct a reexamination of family income and composition at least annually. This includes gathering and verifying current information about family composition, income, and expenses. Based on this updated information, the family's income and rent must be recalculated. This part discusses the schedule for annual reexaminations, the information to be collected and verified, and annual reexamination effective dates.

Unlike when performing an interim reexamination or at intake, at annual reexamination, County Housing must determine the income of the family for the previous 12-month period. Income from assets, however, is always anticipated, irrespective of the income examination type [Notice PIH 2023-27]. PHAs also have the option of using a "safe harbor" income verification from another federal means-tested program to verify gross annual income. Chapter 7 contains the County Housing's policies related to streamlined income determinations and the use of safe harbor income verifications.

11-I.B. SCHEDULING ANNUAL REEXAMINATIONS

County Housing must establish a policy to ensure that the annual reexamination for each family is completed *within* a 12-month period and may require reexaminations more frequently [HCV GB p. 12-1].

County Housing Policy

County Housing will begin the annual reexamination process 120 days in advance of its scheduled effective date. Generally, County Housing will schedule annual reexamination effective dates to coincide with the family's anniversary date.

Anniversary date is defined as 12 months from the effective date of the family's last annual reexamination or, during a family's first year in the program, from the effective date of the family's initial examination (admission).

County Housing may also schedule an annual reexamination for completion prior to the anniversary date for administrative purposes.

Notification of and Participation in the Annual Reexamination Process

County Housing is required to obtain the information needed to conduct annual reexaminations. How that information will be collected is left to the discretion of County Housing. However, PHAs should give tenants who were not provided the opportunity the option to complete Form HUD-92006 at this time [Notice PIH 2009-36].

County Housing Policy

Annual reexaminations will be conducted electronically using an online portal. Notification of the annual reexamination will be sent by first-class mail and email. It will inform the family of the information and documentation that must be provided to County Housing, and the deadline for providing it. Documents will be accepted by mail, email, fax, in-person, or via the online portal. County Housing will, however, conduct reexams in person if requested as a reasonable accommodation or by LEP persons. Reasonable accommodation requests will be handled in accordance with the policies in Chapter 2. Further, an in-person interview will be scheduled if the family requests assistance in providing information or

documentation requested by County Housing, if the required paperwork is not returned timely, or if it is returned timely but is not complete.

If the reexamination notice is returned by the post office with no forwarding address, a notice of termination (see Chapter 12) will be sent to the family's address of record, as well as to any alternate address provided in the family's file.

11-I.C. CONDUCTING ANNUAL REEXAMINATIONS

As part of the annual reexamination process, families are required to provide updated information to County Housing regarding the family's income, expenses, and composition [24 CFR 982.551(b)].

County Housing Policy

Families will be asked to supply all required information (as described in the reexamination notice) before the deadline specified in the notice. The required information will include a County Housing-designated reexamination form as well as supporting documents or forms related to the family's income, expenses, and family composition.

County Housing will notify the family in writing if any required documentation or information is missing. The missing information or documentation must be provided within 10 business days of the date County Housing notifies the family. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.

If the family does not provide the required documents or information within the required time period (plus any extensions), the family will be sent a proposed notice of termination of rental assistance (see Chapter 12).

If the family requests or County Housing schedules an in-person interview, families will be asked to bring all required information (as described in the reexamination notice) to the reexamination appointment.

Any required documents or information that the family is unable to provide at the time of the interview must be provided within 10 business days of the interview. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension.

If the family does not provide the required documents or information within the required time period (plus any extensions), the family will be sent a proposed notice of termination of rental assistance (see Chapter 12).

In accordance with 24 CFR 5.618(c), County Housing will not enforce the asset limitation under 24 CFR 5.618(a) at annual or interim reexaminations. Accordingly, County Housing will not make a determination of a family's compliance with the asset limitation based on net family assets or ownership of real property when conducting an annual or interim reexamination. This policy applies to all families receiving assistance under the Housing Choice Voucher program.

Additionally, HUD recommends that at annual reexaminations PHAs ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state [Notice PIH 2012-28].

County Housing Policy

At the annual reexamination, County Housing will ask whether the tenant, or any member of the tenant's household, is subject to a lifetime sex offender registration requirement in any state. County Housing will use the Dru Sjodin National Sex Offender database to verify the information provided by the tenant.

If County Housing proposes to terminate assistance based on lifetime sex offender registration information, County Housing must notify the household of the proposed action and must provide the subject of the record and the tenant a copy of the record and an opportunity to dispute the accuracy and relevance of the information prior to termination. [24 CFR 5.903(f) and 5.905(d)]. (See Chapter 12.)

The information provided by the family generally must be verified in accordance with the policies in Chapter 7. Unless the family reports a change, or County Housing has reason to believe a change has occurred in information previously reported by the family, certain types of information that are verified at admission typically do not need to be re-verified on an annual basis. These include:

- Legal identity
- Age
- Social security numbers
- A person's disability status
- Citizenship or immigration status

If adding a new family member to the unit causes overcrowding according to space standards (see Chapter 8), County Housing must issue the family a new voucher, and the family and County Housing must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, County Housing must terminate the HAP contract in accordance with its terms [24 CFR 982.403].

11-I.D. DETERMINING ONGOING ELIGIBILITY OF CERTAIN STUDENTS [24 CFR 982.552(b)(5)]

Section 327 of Public Law 109-115 established restrictions on the ongoing eligibility of certain students (both part- and full-time) who are enrolled in institutions of higher education.

If a student enrolled in an institution of higher education is under the age of 24, is not a veteran, is not married, does not have a dependent child, and is not a person with disabilities receiving HCV assistance as of November 30, 2005, the student's eligibility must be reexamined along with the income eligibility of the student's parents on an annual basis. In these cases, both the student and the student's parents must be income eligible for the student to continue to receive HCV assistance. If, however, a student in these circumstances is determined independent from their parents or is considered a *vulnerable youth* in accordance with County Housing policy, the income of the student's parents will not be considered in determining the student's ongoing eligibility.

Students who reside with parents in an HCV assisted unit are not subject to this provision. It is limited to students who are receiving assistance on their own, separately from their parents.

County Housing Policy

During the annual reexamination process, County Housing will determine the ongoing eligibility of each student who is subject to the eligibility restrictions in 24 CFR 5.612 by reviewing the student's individual income as well as the income of the student's parents. If the student has been determined "independent" from their parents or is considered a

vulnerable youth based on the policies in Sections 3-II.E and 7-II.E, the parents' income will not be reviewed.

If the student is no longer income eligible based on their own income or the income of their parents, the student's assistance will be terminated in accordance with the policies in Section 12-I.D.

If the student continues to be income eligible based on their own income and the income of their parents (if applicable), County Housing will process a reexamination in accordance with the policies in this chapter.

11-I.E. CALCULATING ANNUAL INCOME AT ANNUAL REEXAMINATION [24 CFR 5.609(c)(2) and Notice PIH 2023-27]

County Housing must determine the income of the family for the previous 12-month period and use this amount as the family income for annual reexaminations, except where streamlined income determination is used as indicated in Chapter 7 of this policy. PHAs may also use Safe Harbor income determinations dated within the last 12 months from a means-tested federal public assistance program at annual reexamination as outlined in Chapter 7 of this policy.

In determining the family's income for the previous 12-month period, any change of income since the family's last annual reexamination, including those that did not meet the threshold to process an interim reexamination in accordance with County Housing policies and 24 CFR 5.657(c) or 960.257(b), must be considered.

Income from assets is always anticipated, irrespective of the income examination type.

A change in income may be a loss of income or the addition of a new source of income. Changing to a different employer in the prior year does not necessarily constitute a change if the income earned from either employer is substantially the same. County Housing should look at the entirety of the family's unearned income and earned income from the prior year in which earned income may have been one constant job or many different jobs that start and stop.

Cost of Living Adjustments (COLA) to Social Security income and Social Security disability income are always considered changes to income because the COLA is an adjustment that automatically occurs annually by law. See Chapter 6 for County Housing policies on when the COLA is applied and Chapter 7 on streamlined determination of income for inflationary adjustments.

Notice PIH 2023-27 lists the following steps to calculate both earned and unearned income at annual reexamination.

Step 1: The PHA determines annual income for the previous 12-month period by reviewing the following information:

- The EIV Income Report pulled within 120 days of the effective date of the annual reexamination;
- The income reported on the most recent HUD–50058; and
- The amount of prior-year income reported by the family on the PHA's annual reexamination paperwork.

Step 2: The PHA takes into consideration any interim reexamination of family income completed since the last annual reexamination.

- If there was an interim reexamination performed, the PHA must use the annual income from the interim to determine the family's total annual income, provided there are no additional changes.
- If the PHA did not perform an interim or there have been changes since the last reexamination, the PHA moves to Step 3.

Step 3: If there were changes in annual income not processed by the PHA since the last reexamination, the PHA must use current income. The family will be required to report their income for the prior year and whether there have been permanent changes.

If there are no reported changes to an income source, the PHA may use documentation of prior-year income to calculate the annual income. For example, the PHA may use the following documentation:

- EIV + self-certification (wages, Supplemental Security Income (SSI), Social Security, and unemployment)
- Current written third-party verification from the source verifying prior-year income that is dated within 120 days of receipt by the PHA, for example:
  - Year-end statements
  - Paycheck with year-to-date amounts
  - Tax forms (Form 1040, W2, 1099, etc.)

If the family reports changes or the PHA notes discrepancies between EIV and what the family reports, the PHA must follow the verification hierarchy (described in Chapter 7) to document and verify income. Exhibit 11-1 provides detailed examples of how the PHA calculates income from different sources at annual reexamination using the above method.

11-I.F. EFFECTIVE DATES

County Housing Policy

In general, an *increase* in the family share of the rent that results from an annual reexamination will take effect on the family's anniversary date, and the family will be notified at least 30 days in advance.

If less than 30 days remain before the scheduled effective date, the increase will take effect on the first of the month following the end of the 30-day notice period.

If County Housing chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by County Housing, but will always allow for the 30-day notice period.

If the family causes a delay in processing the annual reexamination, *increases* in the family share of the rent will be applied retroactively, to the scheduled effective date of the annual reexamination. The family will be responsible for any overpaid subsidy and may be offered a repayment agreement in accordance with the policies in Chapter 16.

In general, a *decrease* in the family share of the rent that results from an annual reexamination will take effect on the family's anniversary date.

If a family moves to a new unit, the decrease will take effect on the effective date of the new lease and HAP contract.

If County Housing chooses to schedule an annual reexamination for completion prior to the family's anniversary date for administrative purposes, the effective date will be determined by County Housing.

If the family causes a delay in processing the annual reexamination, *decreases* in the family share of the rent will be applied prospectively, from the first day of the month following completion of the reexamination processing.

Delays in reexamination processing are considered to be caused by the family if the family fails to provide the information requested by County Housing by the date specified, and this delay prevents County Housing from completing the reexamination as scheduled.

PART II: INTERIM REEXAMINATIONS [24 CFR 982.516; Notice PIH 2023-27]

11-II.A. OVERVIEW

Family circumstances may change between annual reexaminations. HUD and County Housing policies dictate what kinds of information about changes in family circumstances must be reported, and under what circumstances County Housing must process interim reexaminations to reflect those changes.

A family may request an interim determination of family income or composition because of any changes since the last determination. County Housing must conduct any interim reexamination within a reasonable period of time after the family request or when County Housing becomes aware of a change in the family's adjusted income that must be processed in accordance with HUD regulations. What qualifies as a "reasonable time" may vary based on the amount of time it takes to verify information, but County Housing generally should conduct the interim reexamination not longer than 30 days after becoming aware of changes in income.

Notice PIH 2023-27 changes the conditions under which interim reexaminations must be conducted, codifies when interim reexaminations should be processed and made effective, and requires related changes for annual reexaminations and streamlined income determinations. When County Housing determines that an interim reexamination of income is necessary, they must ask the family to report changes in all aspects of adjusted income.

11-II.B. CHANGES IN FAMILY AND HOUSEHOLD COMPOSITION

Reporting

PHAs must require families to report household composition changes; however, PHAs determine the timeframe in which reporting happens [Notice PIH 2023-27]. County Housing must adopt policies prescribing when and under what conditions the family must report changes in income and family composition [24 CFR 960.257(b)(5)].

County Housing Policy

All families must report all changes in family and household composition that occur between annual reexaminations within 10 business days of the change.

New Family Members Not Requiring PHA Approval

The addition of a family member as a result of birth, adoption, or court-awarded custody does not require County Housing approval. However, the family is required to promptly notify County Housing of the addition [24 CFR 982.551(h)(2)].

New Family and Household Members Requiring Approval

With the exception of children who join the family as a result of birth, adoption, or court-awarded custody, a family must request approval to add a new family member [24 CFR 982.551(h)(2)] or other household members (live-in aide or foster child) [24 CFR 982.551(h)(4)].

Although County Housing must verify aspects of program eligibility when any new family member is added, the Streamlining Final Rule removed the requirement that PHAs conduct a reexamination of income whenever a new family member is added.

If a change in family size causes a violation of space standards (see Chapter 8), County Housing must issue the family a new voucher, and the family and County Housing must try to find an acceptable unit as soon as possible. If an acceptable unit is available for rental by the family, County Housing must terminate the family's HAP contract in accordance with its terms [24 CFR 982.403].

County Housing Policy

Families must request County Housing approval to add a new family member, live-in aide, foster child, or foster adult. This includes any person not on the lease who is expected to stay in the unit for more than 30 consecutive days or 90 cumulative days within a 12-month period and, therefore, no longer qualifies as a "guest." Requests must be made in writing and approved by County Housing prior to the individual moving into the unit.

County Housing will not approve the addition of a new family or household member unless the individual meets its eligibility criteria (see Chapter 3) and documentation requirements (see Chapter 7, Part II).

County Housing will not approve the addition of a foster child or foster adult if it will cause a violation of space standards.

If County Housing determines an individual meets the eligibility criteria and documentation requirements, it will provide written approval to the family. If the approval of a new family member or live-in aide will cause overcrowding according to space standards, the approval letter will explain that the family will be issued a voucher and will be required to move.

If County Housing determines that an individual does not meet its eligibility criteria or documentation requirements, County Housing will notify the family in writing of its decision to deny approval of the new family or household member and the reasons for the denial.

County Housing will make its determination within 10 business days of receiving all information required to verify the individual's eligibility.

Departure of a Family or Household Member

Families must promptly notify County Housing if any household member no longer lives in the unit [24 CFR 982.551(h)(3)]. Because household members are considered when determining the family unit (voucher) size [24 CFR 982.402], County Housing also needs to know when any live-in aide, foster child, or foster adult ceases to reside in the unit. County Housing must process an interim for all decreases in adjusted income when a family member permanently moves out of the unit.

County Housing Policy

If a household member ceases to reside in the unit, the family must inform County Housing within 10 business days. This requirement also applies to a family member who has been considered temporarily absent until the family concludes the individual is permanently absent.

11-II.C. CHANGES AFFECTING INCOME OR EXPENSES

Overview

Interim reexaminations for changes in income or expenses may be scheduled either because County Housing has reason to believe that changes in income or expenses may have occurred, or because the family reports a change.

County Housing must estimate the family's income for the upcoming 12-month period to determine family income for an interim reexamination [24 CFR 5.609(c)(1)]. Policies for projecting income are found in Chapter 6.

Interim Decreases [24 CFR 982.516(c)(2) and Notice PIH 2023-27]

A family may request an interim determination of family income for any change since the last determination. However, County Housing may decline to conduct an interim reexamination if it estimates the family's adjusted income will decrease by an amount that is less than 10 percent of the family's adjusted income. County Housing may set a lower threshold in its policy such as performing an interim for any decreases in adjusted income, although HUD prohibits setting a dollar-figure threshold.

However, while County Housing has some discretion, HUD requires that PHAs perform an interim reexamination for a decrease in adjusted income of any amount in two circumstances:

- When there is a decrease in family size attributed to the death of a family member; or
- When a family member permanently moves out of the assisted unit during the period since the family's last reexamination.

In the above circumstances, County Housing must perform an interim reexamination for any decrease in adjusted income.

If the net effect of the changes in adjusted income due to a decrease in family size results in no change or an increase in annual adjusted income, then County Housing must process the removal of the household member(s) as a non-interim reexamination transaction without making changes to the family's annual adjusted income.

County Housing Policy

County Housing will conduct an interim reexamination any time the family's adjusted income has decreased by any amount.

Interim Increases [24 CFR 982.516(c)(3) and Notice PIH 2023-27]

Increases Less than 10 Percent

PHAs must not process interim reexaminations for income increases that result in less than a 10 percent increase in annual adjusted income.

Increases 10 Percent or Greater

PHAs must conduct an interim reexamination of family income when the PHA becomes aware that the family's adjusted income has changed by an amount that the PHA estimates will result in an increase of 10 percent or more in adjusted income, with the following exceptions:

- PHAs may not consider any increases in earned income when estimating or calculating whether the family's adjusted income has increased unless the family has previously received an interim reduction during the same reexamination cycle; and
- PHAs may choose not to conduct an interim reexamination during the last three months of a certification period if a family reports an increase in income within three months of the next annual reexamination effective date.

When the family previously received an interim reexamination for a decrease to adjusted income during the same annual reexamination cycle, a PHA has the discretion whether to consider a subsequent increase in earned income.

County Housing Policy

When a family reports an increase in their earned income between annual reexaminations, County Housing will not conduct an interim reexamination, regardless of the amount of the increase, and regardless of whether there was a previous decrease since the family's last annual reexamination.

County Housing will process an interim reexamination for any increases in unearned income of 10 percent or more in adjusted income.

County Housing will not perform an interim reexamination when a family reports an increase in income (whether earned or unearned income) within three months of their annual reexamination effective date. However, families who delay reporting income increases until the last three months of their certification period may be subject to retroactive rent increases in accordance with County Housing policies in Chapter 14.

Concurrent Increases in Earned and Unearned Income [Notice PIH 2023-27]

When the family reports an increase in both earned and unearned income at the same time, County Housing must look at the earned and unearned income changes independently of each other to determine if an interim reexamination is performed. County Housing will only conduct an interim reexamination when the increase independently meets the 10 percent threshold and all other requirements for performing interim reexaminations. For example, if a family reported increases in both earned and unearned income that overall resulted in a 12 percent increase in their adjusted income, but the change in earned income represented a 7 percent increase, and the change in unearned income represented a 5 percent increase, County Housing will not perform an interim for either change since neither change meets the 10 percent threshold amount independently. If the change in unearned income met the 10 percent threshold in this case, County Housing would be required to perform an interim. If the change in earned income met the 10 percent threshold in this case, County Housing would not perform an interim.

Cumulative Increases [Notice PIH 2023-27]

A series of smaller reported increases in adjusted income may cumulatively meet or exceed the 10-percent increase threshold, at which point County Housing must conduct an interim reexamination in accordance with its policy.

Family Reporting

County Housing must adopt policies consistent with HUD regulations prescribing when and under what conditions the family must report a change in family income or composition [24 CFR 982.516(d)].

When County Housing determines that an interim reexamination of income is necessary, it must ask the family to report changes in all aspects of adjusted income. For example, if the family reports a decrease in adjusted income of more than 10 percent, but the family also had a change in assets that would result in a change in income, the change in assets must also be reviewed [Notice PIH 2023-27].

County Housing Policy

The family will be required to report all changes in income regardless of the amount of the change, whether the change is to earned or unearned income, or if the change occurred during the last three months of the certification period. Families must report changes in income within 10 business days of the date the change takes effect. The family may notify County Housing of changes either orally or in writing. If the family provides oral notice, County Housing may also require the family to submit the changes in writing.

Within 10 business days of the family reporting the change, County Housing will determine whether the change will require an interim reexamination.

If the change will not result in an interim reexamination, County Housing will note the information in the tenant file but will not conduct an interim reexamination. County Housing will send the family written notification within 10 business days of making this determination informing the family that it will not conduct an interim reexamination.

If the change will result in an interim reexamination, County Housing will determine the documentation the family will be required to submit based on the type of change reported and the policies in Chapter 7. County Housing will ask the family to report changes in all aspects of adjusted income at this time. The family must submit any required information or documents within 10 business days of receiving a request. This time frame may be extended for good cause with County Housing approval. Required documentation will be accepted by mail, email, fax, or in person. County Housing will conduct the interim within a reasonable time period based on the amount of time it takes to verify the information.

Generally, the family will not be required to attend an interview for an interim reexamination. However, if County Housing determines that an interview is warranted, the family may be required to attend.

11-II.D. EFFECTIVE DATES [24 CFR 982.516(e) and Notice 2023-27]

Changes Reported Timely [Notice PIH 2023-27]

If the family reports a change in family income or composition timely in accordance with County Housing policies:

- County Housing must give the family 30 days' advance written notice of rent increases. The rent increase becomes effective on the first of the month after the end of that 30-day notice period.
- Rent decreases are effective on the first of the month after the date of the actual change leading to the interim reexamination of family income. This means the decrease will be applied retroactively.

Changes Not Reported Timely [Notice PIH 2023-27]

If the family failed to report a change in family income or composition timely in accordance with County Housing policies:

- For rent increases, County Housing must implement any resulting rent increases retroactively to the first of the month following the date of the change leading to the interim reexamination of family income.

- For rent decreases, County Housing must implement the change no later than the first rent period following completion of the interim reexamination.

However, County Housing may choose to adopt a policy that would make the effective date of the rent decrease retroactive to the first of the month following completion of the reexamination. PHAs may choose to establish conditions or requirements for when such a retroactive application would apply. PHAs that choose to adopt such policies must ensure the earliest date that the retroactive decrease is applied is the later of:

- The first of the month following the date of the change that led to the interim reexamination; or
- The first of the month following the most recent previous income examination.

In applying a retroactive change in rent as the result of an interim reexamination, County Housing must clearly communicate the effect of the retroactive adjustment to the family so that there is no confusion over the amount of the rent that is the family's responsibility.

County Housing Policy

In general, when the family fails to report a change in income or family composition in a timely manner, and the change would lead to a rent decrease, County Housing will apply the decrease on the first of the month following the completion of the interim reexamination.

However, County Housing will apply the results of the interim reexamination retroactively where a family's ability to report a change in income promptly may have been hampered due to extenuating circumstances such as a natural disaster or disruptions to County Housing management operations. County Housing will decide to apply decreases retroactively on a case-by-case basis.

When County Housing applies the results of interim decreases retroactively, it will clearly communicate the effect of the retroactive adjustment to the family and may enter into a repayment agreement in accordance with its policies.

County Housing will also clearly communicate the effect of the retroactive adjustment to the owner.

PART III: RECALCULATING FAMILY SHARE AND SUBSIDY AMOUNT

11-III.A. OVERVIEW

After gathering and verifying required information for an annual or interim reexamination, County Housing must recalculate the family share of the rent and the subsidy amount and notify the family and owner of the changes [24 CFR 982.516(d)(2), HCV 12-6 and 12-10]. While the basic policies that govern these calculations are provided in Chapter 6, this part lays out policies that affect these calculations during a reexamination.

11-III.B. CHANGES IN PAYMENT STANDARDS AND UTILITY ALLOWANCES

In order to calculate the family share of the rent and HAP amount correctly, changes in payment standards, subsidy standards, or utility allowances may need to be updated and included in the County Housing's calculations.

Specific policies governing how subsidy standards, payment standards, and utility allowances are applied are discussed below.

Payment Standards [24 CFR 982.505]

The family share of the rent and HAP calculations must use the correct payment standard for the family, taking into consideration the family unit size, the size of the unit, and the area in which the unit is located [HCV GB, p. 12-5]. See Chapter 6 for information on how to select the appropriate payment standard.

When County Housing changes its payment standards or the family's situation changes, new payment standards are applied at the following times:

- If County Housing's payment standard amount changes during the term of the HAP contract, the date on which the new standard is applied depends on whether the standard has increased or decreased:
    - If the payment standard amount has i*ncreased,* the increased payment standard will be applied at the *first annual* reexamination following the effective date of the increase in the payment standard.
    - If the payment standard amount has *decreased*, during the term of a HAP contract, County Housing is not required to reduce the payment standard as the HAP contract remains in effect. At the family's *second annual* reexamination, County Housing may, but is not required to, apply the decreased payment standard or may gradually implement the reduced payment standard (See Chapter 6 for County Houisng's policy on decreases in the payment standard).
- If the family moves to a new unit, or a new HAP contract is executed due to changes in the lease (even if the family remains in place) the current payment standard applicable to the family will be used when the new HAP contract is processed.

Subsidy Standards [24 CFR 982.505(c)(4)]

If there is a change in the family unit size that would apply to a family during the HAP contract term, either due to a change in family composition, or a change in County Housing's subsidy standards (see Chapter 5), the new family unit size must be used to determine the payment standard amount for the family at the family's *first annual* reexamination following the change in family unit size.

Utility Allowances [24 CFR 982.517(d)]

The family share of the rent and HAP calculations must reflect any changes in the family's utility arrangement with the owner, or in County Housing's utility allowance schedule [HCV GB, p. 12-5]. Chapter 16 discusses how utility allowance schedules are established.

When there are changes in the utility arrangement with the owner, County Housing must use the utility allowances in effect at the time the new lease and HAP contract are executed.

At reexamination, County Housing must use its current utility allowance schedule [HCV GB, p. 18-8].

County Housing Policy

Revised utility allowances will be applied to a family's rent and subsidy calculations at the first annual reexamination after the allowance is adopted.

11-III.C. NOTIFICATION OF NEW FAMILY SHARE AND HAP AMOUNT

County Housing must notify the owner and family of any changes in the amount of the HAP payment [HUD-52641, HAP Contract]. The notice must include the following information [HCV GB, p. 12-6]:

The amount and effective date of the new HAP payment

The amount and effective date of the new family share of the rent

The amount and effective date of the new tenant rent to owner

The family must be given an opportunity for an informal hearing regarding County Housing's determination of their annual or adjusted income, and the use of such income to compute the housing assistance payment [24 CFR 982.555(a)(1)(i)] (see Chapter 16).

County Housing Policy

The notice to the family will state that the family has the right to request an explanation of how the assistance was calculated and if the family disagrees, they have the right to informal hearing. The notice will include the procedures for requesting an informal hearing.

11-III.D. DISCREPANCIES

During an annual or interim reexamination, County Housing may discover that information previously reported by the family was in error, or that the family intentionally misrepresented information. In addition, County Housing may discover errors made by its staff. When errors resulting in the overpayment or underpayment of subsidy are discovered, corrections will be made in accordance with the policies in Chapter 13.

PART IV: NON-INTERIM REEXAMINATION TRANSACTIONS [Notice PIH 2023-27]

Families may experience changes within the household that do not trigger an interim reexamination under County Housing policy and HUD regulations, but HUD still requires County Housing to report to HUD via Form HUD-50058. These are known as *non-interim reexamination transactions*. In these cases, PHAs will submit a separate, new action code on Form HUD-50058. The following is a list of non-interim reexamination transactions:

- Adding or removing a hardship exemption for the childcare expense deduction;
- Updating or removing the phased-in hardship relief for the health and medical care expense deduction and/or reasonable attendant care and auxiliary apparatus expense deduction (families will begin receiving a 24-month phased-in relief at their next annual or interim reexamination, whichever occurs first);
- Adding or removing general hardship relief for the health and medical care expense deduction and/or reasonable attendant care and auxiliary apparatus expense deduction;
- Adding or removing a minimum rent hardship;
- Adding or removing a non-family member (i.e., live-in aide, foster child, foster adult);
- Ending a family's EID or excluding 50 percent (decreased from 100 percent) of a family member's increase in employment income at the start of the second 12- month EID period.
- Adding a family member and the increase in adjusted income does not trigger an interim reexamination under the final rule;
- Removing a family member and the increase in adjusted income does not trigger an interim reexamination under the final rule;
- Adding/updating a family or household member's Social Security number; and
- Updating a family member's citizenship status from eligible to ineligible or vice versa, resulting in a change to the family's rent and/or utility reimbursement, if applicable (i.e., family begins receiving prorated assistance or previously prorated assistance becomes full assistance), or updating the prorated rent calculation due to the addition or removal of family members in household with an ineligible noncitizen(s).

PHAs must make all other changes to assets, income, and deductions at the next annual or interim reexamination of income, whichever is sooner.

EXHIBIT 11-1: CALCULATING INCOME AT ANNUAL REEXAMINATION

Example 1: Calculating Annual Income at Annual Reexamination Using EIV

Staff are processing the 3/1/2024 annual reexamination for Ruby Myers and her minor daughter, Georgia. No interim reexaminations have been processed, and Ruby has not reported any changes to annual income to the PHA since the 3/1/2023 annual reexamination. The SSA published 2024 COLA is 7 percent.

Last reexamination – 3/1/2023 Annual Reexamination

Ruby:	Georgia:
Wages: $30,000	SSI: $10,980 ($915 monthly)

The EIV report pulled on 12/15/2023

Ruby:	Georgia:
Wages Total: $33,651	SSI Total: $10,980
Quarter 3 of 2023: $8,859 (City Public School)	2023 benefit $915 monthly
Quarter 2 of 2023: $8,616 (City Public School)	
Quarter 1 of 2023: $8,823 (City Public School)	
Quarter 4 of 2022: $7,353 (City Public School)	

<table>
<tr><td colspan="2">Income Reported on Reexamination Application</td></tr>
<tr><td>Ruby:</td><td>Georgia:</td></tr>
<tr><td>Wages at City Public School: $32,000 (switched jobs but no permanent change to amount)</td><td>SSI benefits: $10,980 (no changes)</td></tr>
<tr><td>Calculating Ruby's wages:

Step 1: Determine prior annual income from EIV (i.e., Q4 2022 through Q3 of 2023: $33,651).

Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination (in this case, there have been no interim reexaminations processed since the last annual reexamination).

Step 3: Ruby certifies that the $33,651 of wages in EIV is accurate and reflects her current annual income, so the PHA will use $33,651 for annual wages for the 3/1/2024 annual reexamination given there have been no additional changes to annual income.</td><td>Calculating Georgia's SSI benefit:

Step 1: Determine the prior annual income from EIV (i.e., $915 x 12 months: $10,980).

Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination (in this case, there have been no interim reexaminations processed since the last annual reexamination).

Step 3: Ruby certifies the SSI income in EIV is accurate and reflects Georgia's current annual income. The PHA must adjust the prior-year income (2023 SSI benefit) by the 7- percent COLA and will use this amount to calculate annual SSI income for the 3/1/2024 annual reexamination:

COLA: $64.05 ($915 x 0.07)

New gross SSI benefit: $11,748.60 ($979.05 x 12 months)</td></tr>
<tr><td colspan="2">If Ruby did not agree with the annual wages reported in EIV, the PHA/MFH Owner would be required to verify her current income in accordance with HUD's verification hierarchy.</td></tr>
<tr><td colspan="2">Summary of Annual Income (as reported on the HUD-50058)</td></tr>
<tr><td>Ruby (Head of Household):

Other Wage: $33,651

Myers Family Total Annual Income: $45,399</td><td>Georgia (Other Youth Under 18):

SSI: $11,748</td></tr>
</table>

Example 2: Calculating Annual Income at Annual Reexamination Using EIV:

Family Disagrees with EIV

Staff are processing Paul Hewson's 5/1/2024 annual reexamination. Since the last annual reexamination, Paul reported a decrease in annual income that exceeded 10 percent. Last year, Paul reported a decrease in earned income because he transferred from a full-time job at Sasha's Sweets to a part-time job at Viking Bakery. Following HUD's EIV verification hierarchy, staff confirmed Paul was no longer employed at Sasha's Sweets and decreased his anticipated annual income from $28,000 to $7,500 resulting from his new part-time employment at Viking Bakery; an interim reexamination was processed effective 7/1/2023. After the 7/1/2023 interim, Paul worked briefly at two different jobs, but he says he is no longer working and is not planning to work.
5/1/2023 Annual Reexamination
Wages: $28,000

The EIV report pulled on 1/15/2024

Wages Total: $18,271

Quarter 3 of 2023: $2,500 (Viking Bakery)

Quarter 3 of 2023: $796 (Sweet Tooth Candy Bar)

Quarter 2 of 2023: $1,300 (Sasha's Sweets)

Quarter 2 of 2023: $584 (Larry's Concessions)

Quarter 2 of 2023: $2,401 (Viking Bakery)

Quarter 1 of 2023: $6,500 (Sasha's Sweets)

Quarter 4 of 2022: $600 (Sasha's Sweets)

SS/SSI: No history of benefits

Income Reported on Reexamination Application
Wages: $0 (permanent change; no longer receiving)
Social Security: $14,400 ($1,200 monthly)
Paul certified on the PHA's annual reexamination paperwork that he does not agree with the annual wages of $18,271 reported in EIV and it is not reflective of his current anticipated annual income. He reported he is currently unemployed, and provided a copy of an award letter from the Social Security Administration to document that he will begin receiving a monthly disability benefit of $1,200 effective 3/1/2024.
Calculating Wages and SS Benefit
Step 1: Determine prior annual income taking into consideration the 7/1/2023 interim reexamination (i.e., EIV wages reflected Q4 2022 through Q3 2023: $18,271)
Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there was a 7/1/2023 interim that reduced wages to $7,500.
Step 3: Obtain documentation to verify current income and confirm Paul is no longer employed at Viking Bakery or The Sweet Tooth Candy Bar (the employers reported in the most recent quarter of EIV). This step is necessary, because Paul did not agree with the EIV income report or income reported on the last interim reexamination. Paul reported that he is no longer working at all.
Process the annual reexamination effective 5/1/2024 using annual SS income of $14,400 and $0 wages.
Summary of Annual Income (as reported on the HUD-50058)
Paul (Head of Household): $14,400 (SS)
Hewson Family Total Annual Income: $14,400

Example 3: Calculating Annual Income at Annual Reexamination

Staff are processing the 11/1/2024 annual reexamination for Samantha and Fergus Pool, head of household and spouse. On 2/14/2024 Samantha reported her monthly child support payment was reduced from $200 to $100 per month, but an interim reexamination was not processed because the reduction in child support income for Samantha's daughter, Hailey, did not result in a decrease of 10 percent or more in annual adjusted income, and the PHA did not establish a lower threshold. Samantha did not report any additional changes to the PHA.

Last reexamination – 11/1/2023 Annual Reexamination

Samantha:	Fergus:
Business income: $28,000	Wages: $8,250
VA disability pension: $12,000	Other non-wage income: $3,000 (Go Fund Me online fundraiser)
Child support: $2,400	

The EIV report pulled on 9/16/2024

Samantha:	Fergus:
Wages Total: $0 (no wage data reported since Q1 2023)	Wages Total: $8,600
	Quarter 1 of 2024: $2,100 (Ian's Fish 'n' Chips)
	Quarter 1 of 2024: $500 (Claire's Healthcare Supplies)
	Quarter 4 of 2023: $1,000 (Claire's Healthcare Supplies)
	Quarter 3 of 2023: $1,800 (The Onion Garden Shop)
	Quarter 2 of 2023: $3,200 (Ivar's Fish Haus)

Current Family Circumstances: Income Reported on Reexamination Application

Samantha and Fergus reported how much income was earned/received in the previous 12-month period and noted permanent changes, where applicable, for each source of their income on PHA's annual reexamination form. However, no information was reported by the family concerning other non-wage income. Fergus reported only wages and his current employment at Ian's Fish 'n' Chips for the annual reexamination. The family supplied the supporting documentation noted below to the PHA for the 11/1/2024 annual reexamination.

Samantha:	Fergus:
Business income: $28,750 (last year); has decreased to $18,000 (permanent change)	Wages: $6,000
VA disability benefit: $12,000 (last year); has increased to $12,300 (permanent change)	
Child support: $2,400 (last year); has decreased to $1,200 (permanent change)	

Calculating Samantha's Net Business Income

Step 1: Determine prior annual net business income (i.e., $28,000 on last HUD–50058).

Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there have been no interim reexaminations processed since the last annual reexamination.

Step 3: Adjust to reflect current net business income. Samantha reported on the annual reexamination application that business income permanently decreased to $18,000. The PHA must obtain supporting documentation from Samantha that demonstrates current net business income. Samantha provided documentation that supported the current annual net business income is $18,000. Process the annual reexamination effective 11/1/2024 using annual net business income determined in Step 3.

Calculating Samantha's VA Pension Income

Step 1: Determine prior annual VA pension income (i.e., $12,000 supported by a VA award letter Samantha supplied that documents the prior year monthly VA pension was $1,000).

Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there have been no interim reexaminations processed since the last annual reexamination.

Step 3: The PHA needs to adjust to reflect current VA pension income. Samantha supplies a VA award letter showing a monthly pension of $1,025, or $12,300 annually. Process the annual reexamination effective 11/1/2024 using annual VA pension income determined in Step 3 ($12,300 in this example).

Calculating Samantha's Child Support Income

Step 1: Determine prior annual child support income (i.e., $2,400 on the last HUD–50058).

Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there have been no interim reexaminations processed since the last annual reexamination. The family reported a decrease from $200 to $100 monthly, but the change was not processed because it did not meet the threshold.

Step 3: The family reported changes, so the PHA must adjust to reflect current child support income. In this example, the family submitted a child support history report from the local child support office that documents regular $100 monthly child supports payments beginning 3/1/2024 through the current month. Process the annual reexamination effective 11/1/2024 using current annual child support income determined in Step 3 ($1,200 in this example).

Calculating Fergus' Wages

Step 1: Determine prior annual income from wages in EIV (i.e., Q2 2023 through Q1 of 2024: $8,600).

Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there have been no interim reexaminations processed since the last annual reexamination.

Step 3: There is a discrepancy between what the family reported and EIV, so the PHA must verify and adjust to reflect current annual income from wages. Fergus reported $6,000 in annual income from wages on the annual reexamination from a single employer, Ian's Fish 'n' Chips. The PHA projected annual income of $7,800 based on the two paystubs for this employer, and EIV shows $8,600 earned in the most recent four quarters in EIV. To complete Step 3, the PHA must do the following:

- Resolve the discrepancy between EIV wages, the $6,000 annual income Fergus reported, and the $7,800 projected based on the paystubs he provided, and
- Verify he is no longer employed at Claire's Healthcare Supplies in accordance with HUD's verification hierarchy and local policies.

The PHA determined that Fergus reported his net vs. gross annual income from wages, which he corrected on the annual reexamination form to reflect his current gross annual income of $9,000. The PHA verified Fergus was no longer employed at Claire's Healthcare Supplies and obtained two additional paystubs. Based on four current and consecutive paystubs, Fergus is now projected to earn $9,360 annually. Process the annual reexamination effective 11/1/2024 using income from wages determined in Step 3 ($9,360 in this example).

<table>
<tr><td colspan="2">Calculating Fergus' Other Non-Wage Income

Step 1: Determine prior annual income from other non-wage income (i.e., $3,000 on the last HUD– 50058).

Step 2: Take into consideration any interim reexamination of family income completed since the last annual reexamination. In this case, there have been no interim reexaminations processed since the last annual reexamination.

Step 3: The family did not report any non-wage income on the annual reexamination form, but it was included on the last HUD–50058. The PHA must verify and adjust to reflect current non-wage income. The PHA must verify no income was received through a "Go Fund Me" online fundraiser so that it may be excluded. Fergus provided a self-certification that he hasn't solicited funds online and doesn't plan to in the following year; he also provided records from the account that documented no fundraising activity in the prior 12-month period. Process the annual reexamination effective 11/1/2024 using annual non-wage income of $0 determined in Step 3.</td></tr>
<tr><td colspan="2">Summary of Annual Income (as reported on the HUD-50058)</td></tr>
<tr><td>Samantha (Head of Household):

Own business: $18,000

Pension: $12,300

Child support: $1,200</td><td>Fergus (Co-head):

Wages: $9,360</td></tr>
<tr><td colspan="2">Poole Family Total Annual Income: $40,860</td></tr>
</table>

Chapter 17

PROJECT-BASED VOUCHERS

INTRODUCTION

This chapter describes HUD regulations and PHA policies related to the project-based voucher (PBV) program in nine parts:

Part I: General Requirements. This part describes general provisions of the PBV program including maximum budget authority requirements, relocation requirements, and equal opportunity requirements.

Part II: PBV Owner Proposals. This part includes policies related to the submission and selection of owner proposals for PBV assistance. It describes the factors the PHA will consider when selecting proposals, the type of housing that is eligible to receive PBV assistance, the cap on assistance at projects receiving PBV assistance, subsidy layering requirements, site selection standards, and environmental review requirements.

Part III: Dwelling Units. This part describes requirements related to NSPIRE standards, the type and frequency of inspections, and housing accessibility for persons with disabilities. The PHA adopts all optional NSPIRE flexibilities permitted by HUD for the PBV program unless otherwise prohibited by federal regulation, HUD notice, or specific provisions of this Administrative Plan.

Part IV: Rehabilitated and Newly Constructed Units. This part describes requirements and policies related to the development and completion of rehabilitated and newly constructed housing units that will be receiving PBV assistance.

Part V: Housing Assistance Payments Contract. This part discusses HAP contract requirements and policies including the execution, term, and termination of the HAP contract. In addition, it describes how the HAP contract may be amended and identifies provisions that may be added to the HAP contract at the PHA's discretion.

Part VI: Selection of PBV Program Participants. This part describes the requirements and policies governing how the PHA and the owner will select a family to receive PBV assistance.

Part VII: Occupancy. This part discusses occupancy requirements related to the lease and describes under what conditions families are allowed or required to move. In addition, exceptions to the occupancy cap (which limits PBV assistance to 25 percent of the units in any project) are also discussed.

Part VIII: Determining Rent to Owner. This part describes how the initial rent to owner is determined, and how rent will be redetermined throughout the life of the HAP contract. Rent reasonableness requirements are also discussed.

Part IX: Payments to Owner. This part describes the types of payments owners may receive under this program.

PART I: GENERAL REQUIREMENTS

17-I.A. OVERVIEW [24 CFR 983.5; FR Notice 1/18/17; Notice PIH 2017-21]

The project-based voucher (PBV) program allows PHAs that already administer a tenant-based voucher program under an annual contributions contract (ACC) with HUD to take up to 20 percent of its authorized units and attach the funding to specific units rather than using it for tenant-based assistance [24 CFR 983.6]. PHAs may only operate a PBV program if doing so is consistent with the PHA's Annual Plan, and the goal of deconcentrating poverty and expanding housing and economic opportunities [42 U.S.C. 1437f(o)(13)].

PHA Policy

The PHA will operate a project-based voucher program using up to 20 percent of its authorized units for project-based assistance.

See Exhibit 17-1 for information on projects to which the PHA has attached PBV assistance.

PBV assistance may be attached to existing housing or newly constructed or rehabilitated housing [24 CFR 983.52]. If PBV units are already selected for project-based assistance either under an agreement to enter into HAP Contract (Agreement) or a HAP contract, the PHA is not required to reduce the number of these units if the number of authorized units is subsequently reduced. However, the PHA is responsible for determining the amount of budget authority that is available for project-based vouchers and ensuring that the amount of assistance that is attached to units is within the amounts available under the ACC, regardless of whether the PHA has vouchers available for project-basing [FR Notice 1/18/17].

Additional Project-Based Units [FR Notice 1/18/17; Notice PIH 2017-21; FR Notice 1/24/22]

The PHA may project-base an additional 10 percent of its units above the 20 percent program limit. The units may be distributed among one, all, or a combination of the categories as long as the total number of units does not exceed the 10 percent cap.

For units under a HAP contract that was first executed on or after April 18, 2017, units qualify under this exception if the units:

- Are specifically made available to house individuals and families that meet the definition of homeless under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302) and contained in the Continuum of Care Interim Rule at 24 CFR 578.3.
- Are specifically made available to house families that are comprised of or include a veteran.
  - *Veteran* means an individual who has served in the United States Armed Forces.
- Provide supportive housing to persons with disabilities or elderly persons as defined in 24 CFR 5.403.
- Are located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year Estimates.

PBV units that house eligible youth receiving FUPY/FYI assistance are also covered by this 10 percent exception authority if the units are under a HAP contract that became effective after December 27, 2020, and if the unit is occupied by an eligible youth receiving FUPY/FYI assistance. FYI TPVs that were awarded under Notice PIH 2019-20 are not part of this exception since PHAs are prohibited from project-basing FYI TPVs. Units added after December 27, 2020, through an amendment of a HAP contract that became effective after December 27, 2020, are eligible for this 10 percent exception authority. In contrast, units added after December 27, 2020, through an amendment of a HAP contract that became effective on or prior to December 27, 2020, are not eligible for this 10 percent exception authority [FR Notice 1/24/22]. See Chapter 19 for policies specific to project-basing FUPY vouchers.

PHA Policy

The PHA may project-base up to an additional 10 percent of its authorized units, up to 30 percent, in accordance with HUD regulations and requirements.

Units Not Subject to the PBV Program Limitation [FR Notice 1/18/17]

PBV units under the RAD program and HUD-VASH PBV set-aside vouchers do not count toward the 20 percent limitation when PBV assistance is attached to them.

In addition, units that were previously subject to certain federal rent restrictions or were receiving another type of long-term housing subsidy provided by HUD are not subject to the cap. The unit must be covered under a PBV HAP contract that first became effective on or after April 18, 2017.

PHA Policy

The PHA may project-base units not subject to the 20 percent cap in accordance with HUD regulations and requirements.

17-I.B. TENANT-BASED VS. PROJECT-BASED VOUCHER ASSISTANCE [24 CFR 983.2]

Much of the tenant-based voucher program regulations also apply to the PBV program. Consequently, many of the PHA policies related to tenant-based assistance also apply to PBV assistance. The provisions of the tenant-based voucher regulations that do not apply to the PBV program are listed at 24 CFR 983.2.

PHA Policy

Except as otherwise noted in this chapter, or unless specifically prohibited by PBV program regulations, the PHA policies for the tenant-based voucher program contained in this administrative plan also apply to the PBV program and its participants.

17-I.C. RELOCATION REQUIREMENTS [24 CFR 983.7]

Any persons displaced as a result of implementation of the PBV program must be provided relocation assistance in accordance with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA)[42 U.S.C. 4201-4655] and implementing regulations at 49 CFR part 24.

The cost of required relocation assistance may be paid with funds provided by the owner, local public funds, or funds available from other sources. PHAs may not use voucher program funds to cover relocation costs, except that PHAs may use their administrative fee reserve to pay for relocation expenses after all other program administrative expenses are satisfied, and provided that payment of the relocation benefits is consistent with state and local law. Use of the administrative fee for these purposes must also be consistent with other legal and regulatory requirements, including the requirement in 24 CFR 982.155 and other official HUD issuances.

The acquisition of real property for a PBV project is subject to the URA and 49 CFR part 24, subpart B. It is the responsibility of the PHA to ensure the owner complies with these requirements.

17-I.D. EQUAL OPPORTUNITY REQUIREMENTS [24 CFR 983.8]

The PHA must comply with all equal opportunity requirements under federal law and regulations in its implementation of the PBV program. This includes the requirements and authorities cited at 24 CFR 5.105(a). In addition, the PHA must comply with the PHA Plan certification on civil rights and affirmatively furthering fair housing, submitted in accordance with 24 CFR 903.7(o).

PART II: PBV OWNER PROPOSALS

17-II.A. OVERVIEW

With certain exceptions, the PHA must describe the procedures for owner submission of PBV proposals and for PHA selection of PBV proposals [24 CFR 983.51]. Before selecting a PBV proposal, the PHA must determine that the PBV proposal complies with HUD program regulations and requirements, including a determination that the property is eligible housing [24 CFR 983.53 and 983.54], complies with the cap on the number of PBV units per project [24 CFR 983.56], and meets the site selection standards [24 CFR 983.57]. The PHA may not commit PBVs until or unless it has followed the proposal selection requirements defined in 24 CFR 983.51 [Notice PIH 2011-54].

17-II.B. OWNER PROPOSAL SELECTION PROCEDURES [24 CFR 983.51(b)]

The PHA must select PBV proposals in accordance with the selection procedures in the PHA administrative plan. The PHA must select PBV proposals by either of the following two methods.

- PHA request for PBV Proposals. The PHA may solicit proposals by using a request for proposals to select proposals on a competitive basis in response to the PHA request. The PHA may not limit proposals to a single site or impose restrictions that explicitly or practically preclude owner submission of proposals for PBV housing on different sites.
- The PHA may select proposal that were previously selected based on a competition. This may include selection of a proposal for housing assisted under a federal, state, or local government housing assistance program that was subject to a competition in accordance with the requirements of the applicable program, community development program, or supportive services program that requires competitive selection of proposals (e.g., HOME, and units for which competitively awarded LIHTCs have been provided), where the proposal has been selected in accordance with such program's competitive selection requirements within three years of the PBV proposal selection date, and the earlier competitive selection proposal did not involve any consideration that the project would receive PBV assistance. The PHA need not conduct another competition.

Units Selected Non-Competitively [FR Notice 1/18/17; Notice PIH 2017-21; 24 CFR 983.51(b)]

For certain public housing projects where the PHA has an ownership interest or control, the PHA may attach PBV assistance non-competitively without following one of the two processes above.

This exception applies when the PHA is engaged in an initiative to improve, develop, or replace a public housing property or site. The public housing units may either currently be in the public housing inventory or may have been removed from the public housing inventory within five years of the date on which the PHA entered into the AHAP or HAP.

If the PHA is planning rehabilitation or new construction on the project, a minimum threshold of $25,000 per unit in hard costs must be expended.

If the PHA plans to replace public housing by attaching PBV assistance to existing housing in which the PHA has an ownership interest or control, then the $25,000 per unit minimum threshold does not apply as long as the existing housing substantially complies with NSPIRE standards.

The PHA must include in the administrative plan what work it plans to do on the property or site and how many PBV units will be added to the site.

PHA Policy

The PHA will not attach PBVs to projects owned by the PHA as described above.

Solicitation and Selection of PBV Proposals [24 CFR 983.51(c)]

PHA procedures for selecting PBV proposals must be designed and actually operated to provide broad public notice of the opportunity to offer PBV proposals for consideration by the PHA. The public notice procedures may include publication of the public notice in a local newspaper of general circulation and other means designed and actually operated to provide broad public notice. The public notice of the PHA request for PBV proposals must specify the submission deadline. Detailed application and selection information must be provided at the request of interested parties.

PHA Policy

PHA Request for Proposals for Rehabilitated and Newly Constructed Units

The PHA will advertise its request for proposals (RFP) for rehabilitated and newly constructed housing in the following newspapers and trade journals.

- **Housing Agency Marketplace (International eProcurement Website**
- **County Housing Website**
- **Post-Dispatch Newspaper**
- **Saint Louis American Newspaper**

The advertisement will state the number of vouchers available to be project-based, the type of units that will be considered, the submission deadline, and will note how to obtain the full RFP with information on the application and selection process. Advertisements will also contain a statement that participation in the PBV program requires compliance with Fair Housing and Equal Opportunity (FHEO) requirements.

In addition, the PHA will post the RFP and proposal submission and rating and ranking procedures on its website.

The PHA will publish its advertisement in the newspapers and trade journals mentioned above for at least one day per week for three consecutive weeks. The advertisement will specify the number of units the PHA estimates that it will be able to assist under the funding the PHA is making available. Proposals will be due in the PHA office by close of business 30 calendar days from the date of the last publication.

In order for the proposal to be considered, the owner must submit the proposal to the PHA by the published deadline date, and the proposal must respond to all requirements as outlined in the RFP. Incomplete proposals will not be reviewed.

The PHA will rate and rank proposals for rehabilitated and newly constructed housing using the following criteria:

Owner experience and capability to build or rehabilitate housing as identified in the RFP;

Extent to which the project furthers the PHA goal of deconcentrating poverty and expanding housing and economic opportunities;

If applicable, the extent to which services for special populations are provided on site or in the immediate area for occupants of the property; and

In order to promote partially assisted projects, projects where less than 25 percent of the units will be assisted will be rated higher than projects where 25 percent or more of the units will be assisted. In the case of projects for occupancy by the elderly, persons with disabilities or families needing other services, the PHA will rate partially assisted projects on the percentage of units assisted. Projects with the lowest percentage of assisted units will receive the highest score.

PHA Requests for Proposals for Existing Housing Units

The PHA will advertise its request for proposals (RFP) for existing housing in the following newspapers and trade journals.

- **Housing Agency Marketplace (International eProcurement Website**
- **County Housing Website**
- **Post-Dispatch Newspaper**
- **Saint Louis American Newspaper**

The advertisement will state the number of vouchers available to be project-based, the type of units that will be considered, the submission deadline, and will note how to obtain the full RFP with information on the application and selection process. Advertisements will also contain a statement that participation in the PBV program requires compliance with Fair Housing and Equal Opportunity (FHEO) requirements.

In addition, the PHA will post the notice inviting such proposal submission and the rating and ranking procedures on its website.

The PHA will periodically publish its advertisement in the newspapers and trade journals mentioned above for at least one day per week for three consecutive weeks. The advertisement will specify the number of units the PHA estimates that it will be able to assist under the funding the PHA is making available. Owner proposals will be accepted on a first-come first-served basis and will be evaluated using the following criteria:

Experience as an owner in the tenant-based voucher program and owner compliance with the owner's obligations under the tenant-based program;

Extent to which the project furthers the PHA goal of deconcentrating poverty and expanding housing and economic opportunities;

If applicable, extent to which services for special populations are provided on site or in the immediate area for occupants of the property; and

Extent to which units are occupied by families that are eligible to participate in the PBV program.

PHA Selection of Proposals Subject to a Previous Competition under a Federal, State, or Local Housing Assistance Program

The PHA will accept proposals for PBV assistance from owners that were competitively selected under another federal, state or local housing assistance program, including projects that were competitively awarded Low-Income Housing Tax Credits on an ongoing basis.

The PHA may periodically advertise that it is accepting proposals, in the following newspapers and trade journals:

- **Housing Agency Marketplace (International eProcurement Website**
- **County Housing Website**
- **Post-Dispatch Newspaper**
- **Saint Louis American Newspaper**

The advertisement will state the number of vouchers available to be project-based, the type of units that will be considered, the submission deadline, and will note how to obtain the full RFP with information on the application and selection process. Advertisements will also contain a statement that participation in the PBV program requires compliance with Fair Housing and Equal Opportunity (FHEO) requirements.

In addition to, or in place of advertising, the PHA may also directly contact specific owners that have already been selected for Federal, state, or local housing assistance based on a previously held competition, to inform them of available PBV assistance.

Proposals will be reviewed on a first-come first-served basis. The PHA will evaluate each proposal on its merits using the following factors:

Extent to which the project furthers the PHA goal of deconcentrating poverty and expanding housing and economic opportunities; and

Extent to which the proposal complements other local activities such as the redevelopment of a public housing site under the HOPE VI program, the HOME program, CDBG activities, other development activities in a HUD-designated Enterprise Zone, Economic Community, Choice Neighborhood, or Renewal Community.

PHA-Owned Units [24 CFR 983.51(e), 983.59, FR Notice 1/18/17, and Notice PIH 2017-21]

A PHA-owned unit may be assisted under the PBV program only if the HUD field office or HUD-approved independent entity reviews the selection process and determines that the PHA-owned units were appropriately selected based on the selection procedures specified in the PHA administrative plan. This also applies to noncompetitive selections. If the PHA selects a proposal for housing that is owned or controlled by the PHA, the PHA must identify the entity that will review the PHA proposal selection process and perform specific functions with respect to rent determinations, the term of the HAP contract, and inspections.

In the case of PHA-owned units, the term of the HAP contract and any HAP contract renewal must be agreed upon by the PHA and a HUD-approved independent entity. In addition, an independent entity must determine the initial rent to owner, the redetermined rent to owner, and reasonable rent. NSPIRE inspections must also be conducted by an independent entity.

The independent entity that performs these program services may be the unit of general local government for the PHA jurisdiction (unless the PHA is itself the unit of general local government or an agency of such government) or another HUD-approved public or private independent entity.

PHA Policy

The PHA may submit a proposal for project-based housing that is owned or controlled by the PHA. If the proposal for PHA-owned housing is selected, the PHA will use an outside entity to review the PHA selection process. The PHA will obtain HUD approval of outside entity prior to selecting the proposal for PHA-owned housing.

The PHA may only compensate the independent entity from PHA ongoing administrative fee income (including amounts credited to the administrative fee reserve). The PHA may not use other program receipts to compensate the independent entity for its services. The PHA and independent entity may not charge the family any fee for the appraisal or the services provided by the independent entity.

PHA Notice of Owner Selection [24 CFR 983.51(d)]

The PHA must give prompt written notice to the party that submitted a selected proposal and must also give prompt public notice of such selection. Public notice procedures may include publication of public notice in a local newspaper of general circulation and other means designed and actually operated to provide broad public notice.

PHA Policy

Within 30 days of the PHA making the selection, the PHA will notify the selected owner in writing of the owner's selection for the PBV program. The PHA will also notify in writing all owners that submitted proposals that were not selected and advise such owners of the name of the selected owner.

In addition, the PHA will post the notice of owner selection on its electronic web site.

The PHA will make available to any interested party its rating and ranking sheets and documents that identify the PHA basis for selecting the proposal. These documents will be available for review by the public and other interested parties for one month after publication of the notice of owner selection. The PHA will not make available sensitive owner information that is privileged, such as financial statements and similar information about the owner.

The PHA will make these documents available for review at the PHA during normal business hours. The cost for reproduction of allowable documents will be $.25 per page.

17-II.C. HOUSING TYPE [24 CFR 983.52]

The PHA may attach PBV assistance for units in existing housing or for newly constructed or rehabilitated housing developed under and in accordance with an agreement to enter into a housing assistance payments contract that was executed prior to the start of construction. A housing unit is considered an existing unit for purposes of the PBV program, if, at the time of notice of PHA selection, the units substantially comply with NSPIRE standards. Units for which new construction or rehabilitation began after the owner's proposal submission but prior to the execution of the HAP do not subsequently qualify as existing housing. Units that were newly constructed or rehabilitated in violation of program requirements also do not qualify as existing housing.

The PHA must decide what housing type, new construction, rehabilitation, or existing housing, will be used to develop project-based housing. The PHA choice of housing type must be reflected in its solicitation for proposals.

17-II.D. PROHIBITION OF ASSISTANCE FOR CERTAIN UNITS

Ineligible Housing Types [24 CFR 983.53]

The PHA may not attach or pay PBV assistance to shared housing units; units on the grounds of a penal reformatory, medical, mental, or similar public or private institution; nursing homes or facilities providing continuous psychiatric, medical, nursing services, board and care, or intermediate care (except that assistance may be provided in assisted living facilities); units that are owned or controlled by an educational institution or its affiliate and are designated for occupancy by students; manufactured homes; and transitional housing. In addition, the PHA may not attach or pay PBV assistance for a unit occupied by an owner and the PHA may not select or enter into an agreement to enter into a HAP contract or HAP contract for a unit occupied by a family ineligible for participation in the PBV program. A member of a cooperative who owns shares in the project assisted under the PBV program is not considered an owner for purposes of participation in the PBV program. Finally, PBV assistance may not be attached to units for which construction or rehabilitation has started after the proposal submission and prior to the execution of an AHAP.

Subsidized Housing [24 CFR 983.54]

A PHA may not attach or pay PBV assistance to units in any of the following types of subsidized housing:

- A public housing unit;
- A unit subsidized with any other form of Section 8 assistance;
- A unit subsidized with any governmental rent subsidy;
- A unit subsidized with any governmental subsidy that covers all or any part of the operating costs of the housing;
- A unit subsidized with Section 236 rental assistance payments (except that a PHA may attach assistance to a unit subsidized with Section 236 interest reduction payments);
- A Section 202 project for non-elderly with disabilities;
- Section 811 project-based supportive housing for persons with disabilities;
- Section 202 supportive housing for the elderly;
- A Section 101 rent supplement project;
- A unit subsidized with any form of tenant-based rental assistance;
- A unit with any other duplicative federal, state, or local housing subsidy, as determined by HUD or the PHA in accordance with HUD requirements.

17-II.E. SUBSIDY LAYERING REQUIREMENTS [24 CFR 983.55, Notice PIH 2013-11, and FR Notice 3/13/23]

The subsidy layering review is intended to prevent excessive public assistance by combining (layering) housing assistance payment subsidy under the PBV program with other governmental housing assistance from federal, state, or local agencies, including assistance such as tax concessions or tax credits.

HUD requires new construction and rehabilitation housing that will include forms of governmental assistance other than PBVs to undergo a subsidy layering review (SLR) prior to entering into an Agreement to Enter into Housing Assistance Payments Contract (AHAP). Subsidy layering requirements do not apply to existing housing, when PBV is the only governmental assistance, or for projects already subject to a PBV HAP contract, even if the project is recapitalized with outside sources of funding.

When a PHA selects a new construction or rehabilitation project, the PHA must require information regarding all HUD and/or other federal, state, or local governmental assistance to be disclosed by the project owner using Form HUD-2880. Appendix A of FR Notice 3/23/23 contains a list of all required documentation.

Either HUD or a HUD-approved housing credit agency (HCA) in the PHA's jurisdiction performs the subsidy layering review. The PHA must request an SLR through their local HUD Field Office or, if eligible, through a participating HCA.

If the SLR request is submitted to an approved HCA, and the proposed project-based voucher assistance meets HUD subsidy layering requirements, the HCA must submit a certification to HUD and notify the PHA. The PHA may proceed to execute an AHAP at that time if the environmental approval is received.

The HAP contract must contain the owner's certification that the project has not received and will not receive (before or during the term of the HAP contract) any public assistance for acquisition, development, or operation of the housing other than assistance disclosed in the subsidy layering review in accordance with HUD requirements.

17-II.F. CAP ON NUMBER OF PBV UNITS IN EACH PROJECT

25 Percent per Project Cap [24 CFR 983.56, FR Notice 1/18/17, and Notice PIH 2017-21]

In general, the PHA may not select a proposal to provide PBV assistance for units in a project or enter into an agreement to enter into a HAP or a HAP contract to provide PBV assistance for units in a project, if the total number of dwelling units in the project that will receive PBV assistance during the term of the PBV HAP contract is more than the greater of 25 units or 25 percent of the number of dwelling units (assisted or unassisted) in the project.

Exceptions to 25 Percent per Project Cap [FR Notice 1/18/17; Notice PIH 2017-21; FR Notice 1/24/22]

As of April 18, 2017, units are not counted against the 25 percent or 25-unit per project cap if:

- The units are exclusively for elderly families
- The units are for households eligible for supportive services available to all families receiving PBV assistance in the project
    - If the project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year estimates, the project cap is the greater of 25 units or 40 percent (instead of 25 percent) of the units in the project [FR Notice 7/14/17].

The Housing Opportunity Through Modernization Act of 2016 (HOTMA) eliminated the project cap exemption for projects that serve disabled families and modified the exception for supportive services.

Under the Fostering Stable Housing Opportunities (FSHO) amendments, units exclusively made available to youth receiving FUPY/FYI assistance may be excepted from the project cap for HAP contracts first effective after December 27, 2020. For more information on excepted units for FUPY, see Chapter 19.

Projects where these caps were implemented prior to HOTMA (HAP contracts executed prior to April 18, 2017) or FSHO (contract in effect on or prior to December 27, 2020) may continue to use the former exceptions and may renew their HAP contracts under the old requirements, unless the PHA and owner agree to change the conditions of the HAP contract. However, this change may not be made if it would jeopardize an assisted family's eligibility for continued assistance in the project.

Supportive Services

PHAs must include in the PHA administrative plan the type of services offered to families for a project to qualify for the exception and the extent to which such services will be provided. As of April 18, 2017, the project must make supportive services available to all families receiving PBV assistance in the project, but the family does not actually have to accept and receive supportive services for the exception to apply to the unit, although the family must be eligible to receive the supportive services. It is not necessary that the services be provided at or by the project but must be reasonably available to families receiving PBV assistance at the project and designed to help families in the project achieve self-sufficiency or live in the community as independently as possible A PHA may not require participation in the supportive service as a condition of living in the excepted unit, although such services may be offered.

PHA Policy

Excepted units will be limited to units for elderly families.

Projects not Subject to a Project Cap [FR Notice 1/18/17; Notice PIH 2017-21]

PBV units that were previously subject to certain federal rent restrictions or receiving another type of long-term housing subsidy provided by HUD are exempt from the project cap. In other words, 100 percent of the units in these projects may receive PBV assistance.

PHA Policy

The PHA does not have any PBV units that are subject to the per project cap exception.

Promoting Partially Assisted Projects [24 CFR 983.56(c)]

A PHA may establish local requirements designed to promote PBV assistance in partially assisted projects. A *partially assisted project* is a project in which there are fewer units covered by a HAP contract than residential units [24 CFR 983.3].

A PHA may establish a per-project cap on the number of units that will receive PBV assistance or other project-based assistance in a multifamily project containing excepted units or in a single-family building. A PHA may also determine not to provide PBV assistance for excepted units, or the PHA may establish a per-project cap of less than 25 units or 25 percent of units.

PHA Policy:

Excepted units will be limited to units for elderly families.

Beyond that, the PHA will not impose any further cap on the number of PBV units assisted per project.

17-II.G. SITE SELECTION STANDARDS

Compliance with PBV Goals, Civil Rights Requirements, and NSPIRE Site Standards [24 CFR 983.57(b)]

The PHA may not select a proposal for existing, newly constructed, or rehabilitated PBV housing on a site or enter into an agreement to enter into a HAP contract or HAP contract for units on the site, unless the PHA has determined that PBV assistance for housing at the selected site is consistent with the goal of deconcentrating poverty and expanding housing and economic opportunities. The standard for deconcentrating poverty and expanding housing and economic opportunities must be consistent with the PHA Plan under 24 CFR 903 and the PHA administrative plan.

In addition, prior to selecting a proposal, the PHA must determine that the site is suitable from the standpoint of facilitating and furthering full compliance with the applicable Civil Rights Laws, regulations, and Executive Orders, and that the site meets the NSPIRE site and neighborhood standards at 24 CFR 5.703.

PHA Policy

It is the PHA goal to select sites for PBV housing that provide for deconcentrating poverty and expanding housing and economic opportunities. In complying with this goal the PHA will limit approval of sites for PBV housing in census tracts that have poverty concentrations of 20 percent or less.

However, the PHA will grant exceptions to the 20 percent standard where the PHA determines that the PBV assistance will complement other local redevelopment activities designed to deconcentrate poverty and expand housing and economic opportunities in census tracts with poverty concentrations greater than 20 percent, such as sites in:

A census tract in which the proposed PBV development will be located in a HUD-designated Enterprise Zone, Economic Community, Choice Neighborhood, or Renewal Community;

A census tract where the concentration of assisted units will be or has decreased as a result of public housing demolition and HOPE VI redevelopment;

A census tract in which the proposed PBV development will be located is undergoing significant revitalization as a result of state, local, or federal dollars invested in the area;

A census tract where new market rate units are being developed where such market rate units will positively impact the poverty rate in the area;

A census tract where there has been an overall decline in the poverty rate within the past five years; or

A census tract where there are meaningful opportunities for educational and economic advancement.

Existing and Rehabilitated Housing Site and Neighborhood Standards [24 CFR 983.57(d)]

The PHA may not enter into an agreement to enter into a HAP contract nor enter into a HAP contract for existing or rehabilitated housing until it has determined that the site complies with the HUD required site and neighborhood standards. The site must:

- Be adequate in size, exposure, and contour to accommodate the number and type of units proposed;
- Have adequate utilities and streets available to service the site;
- Promote a greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons;
- Be accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services equivalent to those found in neighborhoods consisting largely of unassisted similar units; and
- Be located so that travel time and cost via public transportation or private automobile from the neighborhood to places of employment is not excessive.

New Construction Site and Neighborhood Standards [24 CFR 983.57(e)]

In order to be selected for PBV assistance, a site for newly constructed housing must meet the following HUD required site and neighborhood standards:

- The site must be adequate in size, exposure, and contour to accommodate the number and type of units proposed;
- The site must have adequate utilities and streets available to service the site;
- The site must not be located in an area of minority concentration unless the PHA determines that sufficient, comparable opportunities exist for housing for minority families in the income range to be served by the proposed project outside areas of minority concentration or that the project is necessary to meet overriding housing needs that cannot be met in that housing market area;
- The site must not be located in a racially mixed area if the project will cause a significant increase in the proportion of minority to non-minority residents in the area.
- The site must promote a greater choice of housing opportunities and avoid undue concentration of assisted persons in areas containing a high proportion of low-income persons;
- The neighborhood must not be one that is seriously detrimental to family life or in which substandard dwellings or other undesirable conditions predominate;
- The housing must be accessible to social, recreational, educational, commercial, and health facilities and services and other municipal facilities and services equivalent to those found in neighborhoods consisting largely of unassisted similar units; and
- Except for housing designed for elderly persons, the housing must be located so that travel time and cost via public transportation or private automobile from the neighborhood to places of employment is not excessive.

17-II.H. ENVIRONMENTAL REVIEW [24 CFR 983.58]

The PHA activities under the PBV program are subject to HUD environmental regulations in 24 CFR parts 50 and 58. The *responsible entity* is responsible for performing the federal environmental review under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.). The PHA may not enter into an agreement to enter into a HAP contract nor enter into a HAP contract until it has complied with the environmental review requirements.

In the case of existing housing, the responsible entity that is responsible for the environmental review under 24 CFR part 58 must determine whether or not PBV assistance is categorically excluded from review under the National Environmental Policy Act and whether or not the assistance is subject to review under the laws and authorities listed in 24 CFR 58.5.

The PHA may not enter into an agreement to enter into a HAP contract or a HAP contract with an owner, and the PHA, the owner, and its contractors may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct real property or commit or expend program or local funds for PBV activities under this part, until the environmental review is completed.

The PHA must supply all available, relevant information necessary for the responsible entity to perform any required environmental review for any site. The PHA must require the owner to carry out mitigating measures required by the responsible entity (or HUD, if applicable) as a result of the environmental review. **PART III: DWELLING UNITS**

17-III.A. OVERVIEW

This part identifies the special housing quality standards that apply to the PBV program, housing accessibility for persons with disabilities, and special procedures for conducting NSPIRE inspections.

17-III.B. NATIONAL STANDARDS FOR THE PHYSICAL INSPECTION OF REAL ESTATE [24 CFR 983.101]

NSPIRE standards for the tenant-based program, including those for special housing types, generally apply to the PBV program. NSPIRE requirements for shared housing, manufactured home space rental, and the homeownership option do not apply because these housing types are not assisted under the PBV program.

Lead-based Paint [24 CFR 983.101(c)]

The lead-based paint requirements for the tenant-based voucher program do not apply to the PBV program. Instead, The Lead-based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations at 24 CFR Part 35, Subparts A, B, H, and R, and 40 CFR 745.227, apply to the PBV program.

17-III.C. HOUSING ACCESSIBILITY FOR PERSONS WITH DISABILITIES

The housing must comply with program accessibility requirements of section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and implementing regulations at 24 CFR part 8. The PHA must ensure that the percentage of accessible dwelling units complies with the requirements of section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), as implemented by HUD's regulations at 24 CFR 8, subpart C.

Housing first occupied after March 13, 1991, must comply with design and construction requirements of the Fair Housing Amendments Act of 1988 and implementing regulations at 24 CFR 100.205, as applicable. (24 CFR 983.102)

17-III.D. INSPECTING UNITS

Pre-selection Inspection [24 CFR 983.103(a)]

The PHA must examine the proposed site before the proposal selection date. If the units to be assisted already exist, the PHA must inspect all the units before the proposal selection date and must determine whether the units substantially comply with NSPIRE. To qualify as existing housing, units must substantially comply with NSPIRE on the proposal selection date. However, the PHA may not execute the HAP contract until the units fully comply with NSPIRE.

Pre-HAP Contract Inspections [24 CFR 983.103(b), FR Notice 1/18/17, and Notice PIH 2017-20]

The PHA must inspect each contract unit before execution of the HAP contract. The PHA may not provide assistance on behalf of the family until the unit fully complies with NSPIRE, unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial inspection as a result of only non-life-threatening conditions, or if the unit passed an alternative inspection.

PHA Policy

Prior to execution of the HAP Contract, each PBV contract unit must be inspected and determined to substantially comply with NSPIRE standards.

The PHA may execute a HAP Contract and commence housing assistance payments when a unit fails the initial inspection solely due to non-life-threatening (NLT) deficiencies, provided:

- No life-threatening deficiencies are present;
- The owner agrees, in writing, to correct all identified NLT deficiencies within the timeframe established by HUD;
- The PHA documents all deficiencies and establishes a correction deadline; and
- The unit otherwise meets all PBV program requirements.

The PHA will conduct a follow-up inspection to verify correction of all NLT deficiencies. Failure to correct the deficiencies within the required timeframe may result in abatement of housing assistance payments, suspension of assistance, or other remedies available under the HAP Contract and HUD regulations.

Life-threatening deficiencies must be corrected within the HUD-required correction period before a unit may be occupied under the PBV program or assistance may commence.

Turnover Inspections [24 CFR 983.103(c)]

Before providing assistance to a new family in a contract unit, the PHA must inspect the unit. The PHA may not provide assistance on behalf of the family until the unit fully complies with NSPIRE.

Annual/Biennial Inspections [24 CFR 983.103(d); FR Notice 6/25/14]

At least once every 24 months during the term of the HAP contract (or at least triennially for small rural PHAs), the PHA must inspect a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained

in accordance with NSPIRE. Turnover inspections are not counted toward meeting this inspection requirement. The PHA also has the option in certain mixed finance properties to rely on alternative inspections conducted at least triennially.

PHA Policy

The PHA will inspect on an annual basis a random sample consisting of at least 20 percent of the contract units in each building to determine if the contract units and the premises are maintained in accordance with NSPIRE.

If more than 20 percent of the sample of inspected contract units in a building fail the initial inspection, the PHA must reinspect 100 percent of the contract units in the building.

Alternative Inspections [24 CFR 983.103(g); Notice PIH 2016-05]

In the case of mixed-finance properties that are subject to alternative inspections, the PHA may rely upon an alternative inspection conducted at least triennially to demonstrate compliance with inspection requirements.

PHA Policy

The PHA will accept the results of inspections performed by HUD REAC, or for the HOME or LIHTC programs. Inspections will only be accepted if PBV and HCV units are included in the population of units forming the basis of the sample.

The PHA will not utilize inspection results other than from inspections conducted by HUD or for the HOME or LIHTC programs.

Inspection reports and other data must be provided to the PHA within five business days of the inspection. The PHA will review the inspection reports and determine whether the unit will receive a "pass" within five business days. If the PHA determines that the unit does not pass, the PHA will notify the owner and conduct an inspection within 10 business days.

Other Inspections [24 CFR 983.103(e)]

The PHA must inspect contract units whenever needed to determine that the contract units comply with NSPIRE standards and that the owner is providing maintenance, utilities, and other services in accordance with the HAP contract. The PHA must take into account complaints and any other information coming to its attention in scheduling inspections.

The PHA must conduct follow-up inspections needed to determine if the owner (or, if applicable, the family) has corrected an NSPIRE deficiency and must conduct inspections to determine the basis for exercise of contractual and other remedies for owner or family NSPIRE deficiencies.

In conducting PHA supervisory quality control inspections, the PHA should include a representative sample of both tenant-based and project-based units.

Inspecting PHA-Owned Units [24 CFR 983.103(f)]

In the case of PHA-owned units, the inspections must be performed by an independent entity designated by the PHA and approved by HUD. The independent entity must furnish a copy of each inspection report to the PHA and to the HUD field office where the project is located. The PHA must take all necessary actions in response to inspection reports from the independent entity, including exercise of contractual remedies for violation of the HAP contract by the PHA-owner.

PART IV: REHABILITATED AND NEWLY CONSTRUCTED UNITS

17-IV.A. OVERVIEW [24 CFR 983.151]

There are specific requirements that apply to PBV assistance for newly constructed or rehabilitated housing that do not apply to PBV assistance in existing housing. This part describes the requirements unique to this type of assistance.

Housing selected for this type of assistance may not at a later date be selected for PBV assistance as existing housing.

17-IV.B. AGREEMENT TO ENTER INTO HAP CONTRACT

In order to offer PBV assistance in rehabilitated or newly constructed units, the PHA must enter into an agreement to enter into HAP contract (Agreement) with the owner of the property. The Agreement must be in the form required by HUD [24 CFR 983.152(b)]. The PHA may not enter into an Agreement if commencement of construction or rehabilitation has commenced after proposal submission [24 CFR 983.152(c)]. Construction begins when excavation or site preparation (including clearing of the land) begins for the housing. Rehabilitation begins with the physical commencement of rehabilitation activity on the housing.

In the Agreement the owner agrees to develop the PBV contract units to comply with NSPIRE, and the PHA agrees that upon timely completion of such development in accordance with the terms of the Agreement, the PHA will enter into a HAP contract with the owner for the contract units [24 CFR 983.152(a)].

Content of the Agreement [24 CFR 983.152(d)]

At a minimum, the Agreement must describe the following features of the housing to be developed and assisted under the PBV program:

- Site and the location of the contract units;
- Number of contract units by area (size) and number of bedrooms and bathrooms;
- Services, maintenance, or equipment to be supplied by the owner without charges in addition to the rent;
- Utilities available to the contract units, including a specification of utility services to be paid by the owner and utility services to be paid by the tenant;
- An indication of whether or not the design and construction requirements of the Fair Housing Act and section 504 of the Rehabilitation Act of 1973 apply to units under the Agreement. If applicable, any required work item resulting from these requirements must be included in the description of work to be performed under the Agreement;
- Estimated initial rents to owner for the contract units;
- Description of the work to be performed under the Agreement. For rehabilitated units, the description must include the rehabilitation work write up and, where determined necessary by the PHA, specifications and plans. For new construction units, the description must include the working drawings and specifications.
- Any additional requirements for quality, architecture, or design over and above NSPIRE standards.

Execution of the Agreement [24 CFR 983.153]

The Agreement must be executed promptly after PHA notice of proposal selection to the selected owner. The PHA may not enter into the Agreement if construction or rehabilitation has started after proposal submission. Generally, the PHA may not enter into the Agreement with the owner until the subsidy layering review is completed. Likewise, the PHA may not enter into the Agreement until the environmental review is completed and the PHA has received environmental approval. However, the PHA does not need to conduct a subsidy layering review in the case of a HAP contract for existing housing or if the applicable state or local agency has conducted such a review. Similarly, environmental reviews are not required for existing structures unless otherwise required by law or regulation.

PHA Policy

The PHA will enter into the Agreement with the owner within 30 days of receiving both environmental approval and notice that subsidy layering requirements have been met, and before construction or rehabilitation work is started.

17-IV.C. CONDUCT OF DEVELOPMENT WORK

Labor Standards [24 CFR 983.154(b)]

If an Agreement covers the development of nine or more contract units (whether or not completed in stages), the owner and the owner's contractors and subcontractors must pay Davis-Bacon wages to laborers and mechanics employed in the development of housing. Further, these Davis-Bacon requirements apply to existing PBV units when the nature of any work to be performed either before the execution of the HAP contract or within 18 months after execution constitutes project development. Any development initiated on existing units within 18 months after the effective date of the HAP contract on projects with nine or more contract units triggers Davis-Bacon requirements.

The HUD-prescribed form of the Agreement will include the labor standards clauses required by HUD, such as those involving Davis-Bacon wage rates. The addendum to the HAP contract, Form HUD-5679, also includes the required labor standards clauses.

The owner, contractors, and subcontractors must also comply with the Contract Work Hours and Safety Standards Act, Department of Labor regulations in 29 CFR part 5, and other applicable federal labor relations laws and regulations. The PHA must monitor compliance with labor standards.

Owner Disclosure [24 CFR 983.154(d) and (e)]

The Agreement and HAP contract must include a certification by the owner that the owner and other project principals are not on the U.S. General Services Administration list of parties excluded from federal procurement and non-procurement programs.

The owner must also disclose any possible conflict of interest that would be a violation of the Agreement, the HAP contract, or HUD regulations.

17-IV.D. COMPLETION OF HOUSING

The Agreement must specify the deadlines for completion of the housing, and the owner must develop and complete the housing in accordance with these deadlines. The Agreement must also specify the deadline for submission by the owner of the required evidence of completion.

Evidence of Completion [24 CFR 983.155(b)]

At a minimum, the owner must submit the following evidence of completion to the PHA in the form and manner required by the PHA:

- Owner certification that the work has been completed in accordance with NSPIRE and all requirements of the Agreement; and
- Owner certification that the owner has complied with labor standards and equal opportunity requirements in development of the housing.

At the PHA's discretion, the Agreement may specify additional documentation that must be submitted by the owner as evidence of housing completion.

PHA Policy

The PHA will determine the need for the owner to submit additional documentation as evidence of housing completion on a case-by-case basis depending on the nature of the PBV project. The PHA will specify any additional documentation requirements in the Agreement to enter into HAP contract.

PHA Acceptance of Completed Units [24 CFR 983.156]

Upon notice from the owner that the housing is completed, the PHA must inspect to determine if the housing has been completed in accordance with the Agreement, including compliance with NSPIRE standards and any additional requirements imposed under the Agreement. The PHA must also determine if the owner has submitted all required evidence of completion.

If the work has not been completed in accordance with the Agreement, the PHA must not enter into the HAP contract.

If the PHA determines the work has been completed in accordance with the Agreement and that the owner has submitted all required evidence of completion, the PHA must submit the HAP contract for execution by the owner and must then execute the HAP contract.

PART V: HOUSING ASSISTANCE PAYMENTS CONTRACT (HAP)

17-V.A. OVERVIEW

The PHA must enter into a HAP contract with an owner for units that are receiving PBV assistance. The purpose of the HAP contract is to provide housing assistance payments for eligible families. Housing assistance is paid for contract units leased and occupied by eligible families during the HAP contract term. With the exception of single-family scattered-site projects, a HAP contract shall cover a single project. If multiple projects exist, each project is covered by a separate HAP contract. The HAP contract must be in the form required by HUD [24 CFR 983.202(a)].

17-V.B. HAP CONTRACT REQUIREMENTS

Contract Information [24 CFR 983.203]

The HAP contract must specify the following information:

- The total number of contract units by number of bedrooms;
- The project's name, street address, city or county, state and zip code, block and lot number (if known), and any other information necessary to clearly identify the site and the building;
- The number of contract units in each building, the location of each contract unit, the area of each contract unit, and the number of bedrooms and bathrooms in each contract unit;
- Services, maintenance, and equipment to be supplied by the owner and included in the rent to owner;
- Utilities available to the contract units, including a specification of utility services to be paid by the owner (included in rent) and utility services to be paid by the tenant;
- Features provided to comply with program accessibility requirements of Section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR part 8;
- The HAP contract term;
- The number of units in any project that will exceed the 25 percent per project cap, which will be set aside for occupancy by qualifying families (elderly and/or disabled families and families receiving supportive services); and
- The initial rent to owner for the first 12 months of the HAP contract term.

Execution of the HAP Contract [24 CFR 983.204]

The PHA may not enter into a HAP contract until each contract unit has been inspected and the PHA has determined that the unit complies with the NSPIRE standards, unless the PHA has adopted a policy to enter into a HAP contract for units that fail the initial inspection where no life-threatening conditions are present. For existing housing, the HAP contract must be executed promptly after the PHA selects the owner proposal and inspects the housing units. For newly constructed or rehabilitated housing the HAP contract must be executed after the PHA has inspected the completed units and has determined that the units have been completed in accordance with the agreement to enter into HAP, and the owner furnishes all required evidence of completion.

PHA Policy

For existing housing, the HAP Contract will be executed within 30 days of the PHA determining that:

- All units pass inspection; or
- The units qualify for occupancy under the PHA's Non-Life-Threatening (NLT) Deficiency policy and the owner has agreed to correct all identified deficiencies within HUD-required timeframes.

For rehabilitated or newly constructed housing, the HAP Contract will be executed within 30 days of the PHA determining that:

- The units have been completed in accordance with the Agreement to Enter into HAP Contract;
- The owner has submitted all required evidence of completion; and
- The units either meet NSPIRE standards or qualify for occupancy under the PHA's NLT Deficiency policy.

17-V.B.(1) Non-Life-Threatening Deficiency Correction Requirements

When assistance begins under the PHA's NLT Deficiency policy, the owner must correct all cited deficiencies within the timeframes prescribed by HUD NSPIRE regulations and guidance.
The PHA will schedule and perform a verification inspection to confirm the corrections have been completed.
If the owner fails to correct deficiencies within the required timeframe, the PHA may:

- Abate housing assistance payments;
- Withhold future housing assistance payments;
- Require additional inspections;
- Amend the HAP Contract; or
- Terminate the HAP Contract in accordance with HUD requirements.

The PHA reserves the right to require correction of any deficiency prior to occupancy when the PHA determines that the condition presents a health or safety risk to residents, even if the condition is classified by HUD as non-life-threatening.

Term of HAP Contract [24 CFR 983.205, FR Notice 1/18/17, and Notice PIH 2017-21]

The PHA may enter into a HAP contract with an owner for an initial term of no less than one year and no more than 20 years for each contract unit. The length of the term of the HAP contract for any contract unit may not be less than one year, nor more than 20 years. In the case of PHA-owned units, the term of the HAP contract must be agreed upon by the PHA and the independent entity approved by HUD [24 CFR 983.59(b)(2)].

PHA Policy

The term of all PBV HAP contracts will be negotiated with the owner on a case-by-case basis.

At the time of the initial HAP contract term or any time before expiration of the HAP contract, the PHA may extend the term of the contract for an additional term of up to 20 years if the PHA determines an extension is appropriate to continue providing affordable housing for low-income families. A HAP contract extension may not exceed 20 years. A PHA may provide for multiple extensions; however, in no circumstances may such extensions exceed 20 years, cumulatively. Extensions after the initial extension are allowed at the end of any extension term, provided that not more than 24 months prior to the expiration of the previous extension contract the PHA agrees to extend the term, and that such extension is appropriate to continue providing affordable housing for low-income families or to expand housing opportunities. Extensions after the initial extension term shall not begin prior to the expiration date of the previous extension term. Subsequent extensions are subject to the same limitations. All extensions must be on the form and subject to the conditions prescribed by HUD at the time of the extension. In the case of PHA-owned units, any extension of the term of the HAP contract must be agreed upon by the PHA and the independent entity approved by HUD [24 CFR 983.59(b)(2)].

PHA Policy

When determining whether or not to extend an expiring PBV contract, the PHA will consider several factors including, but not limited to:

The cost of extending the contract and the amount of available budget authority;

The condition of the contract units;

The owner's record of compliance with obligations under the HAP contract and lease(s);

Whether the location of the units continues to support the goals of deconcentrating poverty and expanding housing opportunities; and

Whether the funding could be used more appropriately for tenant-based assistance.

Termination by PHA [24 CFR 983.205(c) and FR Notice 1/18/17]

The HAP contract must provide that the term of the PHA's contractual commitment is subject to the availability of sufficient appropriated funding as determined by HUD or by the PHA in accordance with HUD instructions. For these purposes, sufficient funding means the availability of appropriations, and of funding under the ACC from such appropriations, to make full payment of housing assistance payments payable to the owner for any contract year in accordance with the terms of the HAP contract.

In times of insufficient funding, HUD requires that PHAs first take all cost-saving measures prior to failing to make payments under existing PBV HAP contracts.

If it is determined that there may not be sufficient funding to continue housing assistance payments for all contract units and for the full term of the HAP contract, the PHA may terminate the HAP contract by notice to the owner. The termination must be implemented in accordance with HUD instructions.

Termination by Owner [24 CFR 983.205(d)]

If in accordance with program requirements the amount of rent to an owner for any contract unit is reduced below the amount of the rent to owner at the beginning of the HAP contract term, the owner may terminate the HAP contract by giving notice to the PHA. In this case, families living in the contract units must be offered tenant-based assistance.

Statutory Notice Requirements: Contract Termination or Expiration [24 CFR 983.206, FR Notice 1/18/17, and Notice PIH 2017-21]

Not less than one year before the HAP contract terminates, or if the owner refuses to renew the HAP contract, the owner must notify the PHA and assisted tenants of the termination. The notice must be provided in the form prescribed by HUD. If the owner does not give timely notice, the owner must permit the tenants in assisted units to remain in their units for the required notice period with no increase in the tenant portion of their rent, and with no eviction as a result of the owner's inability to collect an increased tenant portion of rent. An owner may renew the terminating contract for a period of time sufficient to give tenants one-year advance notice under such terms as HUD may require.

Upon termination or expiration of the contract, a family living at the property is entitled to receive a tenant-based voucher. Tenant-based assistance would not begin until the owner's required notice period ends. The PHA must provide the family with a voucher and the family must also be given the option by the PHA and owner to remain in their unit with HCV tenant-based assistance as long as the unit complies with inspection and rent reasonableness requirements. The family must pay their total tenant payment (TTP) and any additional amount if the gross rent exceeds the applicable payment standard. The family has the right to remain in the project as long as the units are used for rental housing and are otherwise eligible for HCV assistance. The owner may not terminate the tenancy of a family that exercises its right to remain except for serious or repeated lease violations or other good cause. Families that receive a tenant-based voucher at the expiration or termination of the PBV HAP contract are not new admissions to the PHA HCV tenant-based program and are not subject to income eligibility requirements or any other admission requirements. If the family chooses to remain in their unit with tenant-based assistance, the family may do so regardless of whether the family share would initially exceed 40 percent of the family's adjusted monthly income.

Remedies for NSPIRE Deficiencies [24 CFR 983.208(b)]

The PHA may not make any HAP payment to the owner for a contract unit during any period in which the unit does not comply with NSPIRE standards. If the PHA determines that a contract does not comply with NSPIRE standards, the PHA may exercise any of its remedies under the HAP contract, for any or all of the contract units. Available remedies include termination of housing assistance payments, abatement or reduction of housing assistance payments, reduction of contract units, and termination of the HAP contract.

PHA Policy

The PHA will abate and terminate PBV HAP contracts for noncompliance with NSPIRE in accordance with the policies used in the tenant-based voucher program. These policies are contained in Section 8-II.G., Enforcing Owner Compliance.

17-V.C. AMENDMENTS TO THE HAP CONTRACT

Substitution of Contract Units [24 CFR 983.207(a)]

At the PHA's discretion and subject to all PBV requirements, the HAP contract may be amended to substitute a different unit with the same number of bedrooms in the same project for a previously covered contract unit. Before any such substitution can take place, the PHA must inspect the proposed unit and determine the reasonable rent for the unit.

Addition of Contract Units [FR Notice 1/18/17 and Notice PIH 2017-21]

The PHA and owner may amend the HAP contract to add additional PBV contract units in projects that already have a HAP contract without having to fulfill the selection requirements found at 24 CFR 983.51(b) for those additional PBV units, regardless of when the HAP contract was signed. The additional PBV units, however, are still subject to the PBV program cap and individual project caps. Prior to attaching additional units without competition, the PHA must submit to the local field office information outlined in FR Notice 1/18/17. The PHA must also detail in the administrative plan their intent to add PBV units and the rationale for adding units to the specific PBV project.

PHA Policy

The PHA will add units to the contract on a case-by-case basis to ensure the availability of affordable housing as long as the addition of units does not exceed allowable project caps.

17-V.D. HAP CONTRACT YEAR, ANNIVERSARY AND EXPIRATION DATES [24 CFR 983.207(b) and 983.302(e)]

The HAP contract year is the period of 12 calendar months preceding each annual anniversary of the HAP contract during the HAP contract term. The initial contract year is calculated from the first day of the first calendar month of the HAP contract term.

The annual anniversary of the HAP contract is the first day of the first calendar month after the end of the preceding contract year.

There is a single annual anniversary and expiration date for all units under a particular HAP contract, even in cases where contract units are placed under the HAP contract in stages (on different dates) or units are added by amendment. The anniversary and expiration dates for all units coincide with the dates for the contract units that were originally placed under contract.

17-V.E. OWNER RESPONSIBILITIES UNDER THE HAP CONTRACT [24 CFR 983.210]

When the owner executes the HAP contract s/he certifies that at such execution and at all times during the term of the HAP contract:

- All contract units are in good condition and the owner is maintaining the premises and contract units in accordance with NSPIRE standards;
- The owner is providing all services, maintenance, equipment and utilities as agreed to under the HAP contract and the leases;
- Each contract unit for which the owner is receiving HAP, is leased to an eligible family referred by the PHA, and the lease is in accordance with the HAP contract and HUD requirements;
- To the best of the owner's knowledge the family resides in the contract unit for which the owner is receiving HAP, and the unit is the family's only residence;
- The owner (including a principal or other interested party) is not the spouse, parent, child, grandparent, grandchild, sister, or brother of any member of a family residing in a contract unit;
- The amount of the HAP the owner is receiving is correct under the HAP contract;
- The rent for contract units does not exceed rents charged by the owner for comparable unassisted units;
- Except for HAP and tenant rent, the owner has not received and will not receive any other payment or consideration for rental of the contract unit;
- The family does not own or have any interest in the contract unit (does not apply to family's membership in a cooperative); and
- Repair work on the project selected as an existing project that is performed after HAP execution within such post-execution period as specified by HUD may constitute development activity, and if determined to be development activity, the repair work undertaken shall be in compliance with Davis-Bacon wage requirements.

17-V.F. ADDITIONAL HAP REQUIREMENTS

Housing Quality and Design Requirements [24 CFR 983.101(e) and 983.208(a)]

The owner is required to maintain and operate the contract units and premises in accordance with NSPIRE standards, including performance of ordinary and extraordinary maintenance. The owner must provide all the services, maintenance, equipment, and utilities specified in the HAP contract with the PHA and in the lease with each assisted family. In addition, maintenance, replacement and redecoration must be in accordance with the standard practice for the building as established by the owner.

The PHA may elect to establish additional requirements for quality, architecture, or design of PBV housing. Any such additional requirements must be specified in the Agreement to enter into a HAP contract and the HAP contract. These requirements must be in addition to, not in place of, compliance with NSPIRE standards.

PHA Policy

The PHA will identify the need for any special features on a case-by-case basis depending on the intended occupancy of the PBV project. The PHA will specify any special design standards or additional requirements in the invitation for PBV proposals, the agreement to enter into HAP contract, and the HAP contract.

Vacancy Payments [24 CFR 983.352(b)]

At the discretion of the PHA, the HAP contract may provide for vacancy payments to the owner for a PHA-determined period of vacancy extending from the beginning of the first calendar month after the move-out month for a period not exceeding two full months following the move-out month. The amount of the vacancy payment will be determined by the PHA and cannot exceed the monthly rent to owner under the assisted lease, minus any portion of the rental payment received by the owner (including amounts available from the tenant's security deposit).

PHA Policy

The PHA will decide on a case-by-case basis if the PHA will provide vacancy payments to the owner. The HAP contract with the owner will contain any such agreement, including the amount of the vacancy payment and the period for which the owner will qualify for these payments.

PART VI: SELECTION OF PBV PROGRAM PARTICIPANTS

17-VI.A. OVERVIEW

Many of the provisions of the tenant-based voucher regulations [24 CFR 982] also apply to the PBV program. This includes requirements related to determining eligibility and selecting applicants from the waiting list. Even with these similarities, there are requirements that are unique to the PBV program. This part describes the requirements and policies related to eligibility and admission to the PBV program.

17-VI.B. ELIGIBILITY FOR PBV ASSISTANCE [24 CFR 983.251(a) and (b)]

The PHA may select families for the PBV program from those who are participants in the PHA's tenant-based voucher program and from those who have applied for admission to the voucher program. For voucher participants, eligibility was determined at original admission to the voucher program and does not need to be redetermined at the commencement of PBV assistance. For all others, eligibility for admission must be determined at the commencement of PBV assistance.

Applicants for PBV assistance must meet the same eligibility requirements as applicants for the tenant-based voucher program. Applicants must qualify as a family as defined by HUD and the PHA, meet asset limitation requirements, have income at or below HUD-specified income limits, and qualify on the basis of citizenship or the eligible immigration status of family members [24 CFR 982.201(a) and 24 CFR 983.2(a)]. In addition, an applicant family must provide social security information for family members [24 CFR 5.216 and 5.218] and consent to the PHA's collection and use of family information regarding income, expenses, and family composition [24 CFR 5.230]. The PHA may also not approve a tenancy if the owner (including a principal or other interested party) of the unit is the parent, child, grandparent, grandchild, sister, or brother of any member of the family, unless needed as a reasonable accommodation. An applicant family must also meet HUD requirements related to current or past criminal activity.

PHA Policy

The PHA will determine an applicant family's eligibility for the PBV program in accordance with the policies in Chapter 3.

In-Place Families [24 CFR 983.251(b)]

An eligible family residing in a proposed PBV contract unit on the date the proposal is selected by the PHA is considered an "in-place family." These families are afforded protection from displacement under the PBV rule. If a unit to be placed under contract (either an existing unit or a unit requiring rehabilitation) is occupied by an eligible family on the date the proposal is selected, the in-place family must be placed on the PHA's waiting list. Once the family's continued eligibility is determined (the PHA may deny assistance to an in-place family for the grounds specified in 24 CFR 982.552 and 982.553), the family must be given an absolute selection preference and the PHA must refer these families to the project owner for an appropriately sized PBV unit in the project. Admission of eligible in-place families is not subject to income targeting requirements.

This regulatory protection from displacement does not apply to families that are not eligible to participate in the program on the proposal selection date.

17-VI.C. ORGANIZATION OF THE WAITING LIST [24 CFR 983.251(c)]

The PHA may establish a separate waiting list for PBV units or it may use the same waiting list for both tenant-based and project-based assistance. The PHA may also merge the PBV waiting list with a waiting list for other assisted housing programs offered by the PHA. If the PHA chooses to offer a separate waiting list for PBV assistance, the PHA must offer to place applicants who are listed on the tenant-based waiting list on the waiting list for PBV assistance.

If a PHA decides to establish a separate PBV waiting list, the PHA may use a single waiting list for the PHA's whole PBV program, or it may establish separate waiting lists for PBV units in particular projects or buildings or for sets of such units.

PHA Policy

The PHA will establish and manage separate waiting lists for individual projects or buildings that are receiving PBV assistance. The PHA currently has waiting lists for the following PBV projects:

-Wellington Family Homes

17-VI.D. SELECTION FROM THE WAITING LIST [24 CFR 983.251(c)]

Applicants who will occupy units with PBV assistance must be selected from the PHA's waiting list. The PHA may establish selection criteria or preferences for occupancy of particular PBV units. The PHA may place families referred by the PBV owner on its PBV waiting list.

Income Targeting [24 CFR 983.251(c)(6)]

At least 75 percent of the families admitted to the PHA's tenant-based and project-based voucher programs during the PHA fiscal year from the waiting list must be extremely low-income families. The income targeting requirement applies to the total of admissions to both programs.

Units with Accessibility Features [24 CFR 983.251(c)(7)]

When selecting families to occupy PBV units that have special accessibility features for persons with disabilities, the PHA must first refer families who require such features to the owner.

Preferences [24 CFR 983.251(d), FR Notice 11/24/08]

The PHA may use the same selection preferences that are used for the tenant-based voucher program, establish selection criteria or preferences for the PBV program as a whole, or for occupancy of particular PBV developments or units. The PHA must provide an absolute selection preference for eligible in-place families as described in Section 17-VI.B. above.

The PHA may establish a selection preference for families who qualify for voluntary services, including disability-specific services, offered in conjunction with assisted units, provided that preference is consistent with the PHA plan. The PHA may not, however, grant a preference to a person with a specific disability [FR Notice 1/18/17].

In advertising such a project, the owner may advertise the project as offering services for a particular type of disability; however, the project must be open to all otherwise eligible disabled persons who may benefit from services provided in the project. In these projects, disabled residents may not be required to accept the particular services offered as a condition of occupancy.

If the PHA has projects with "excepted units" for elderly families or supportive services, the PHA must give preference to such families when referring families to these units [24 CFR 983.261(b); FR Notice 1/18/17].

PHA Policy

The PHA will provide a selection preference when required by the regulation (e.g., eligible in-place families, elderly families or units with supportive services, or mobility impairments for accessible units). The following additional preferences have been established for the following projects, buildings, or sets of units:

- **Wellington Family Homes- Right to Return preference.**

17-VI.E. OFFER OF PBV ASSISTANCE

Refusal of Offer [24 CFR 983.251(e)(3)]

The PHA is prohibited from taking any of the following actions against a family who has applied for, received, or refused an offer of PBV assistance:

- Refuse to list the applicant on the waiting list for tenant-based voucher assistance;
- Deny any admission preference for which the applicant qualifies;
- Change the applicant's place on the waiting list based on preference, date, and time of application, or other factors affecting selection under the PHA's selection policy;
- Remove the applicant from the tenant-based voucher waiting list.

Disapproval by Landlord [24 CFR 983.251(e)(2)]

If a PBV owner rejects a family for admission to the owner's units, such rejection may not affect the family's position on the tenant-based voucher waiting list.

Acceptance of Offer [24 CFR 983.252]

Family Briefing

When a family accepts an offer for PBV assistance, the PHA must give the family an oral briefing. The briefing must include information on how the program works and the responsibilities of the family and owner. In addition to the oral briefing, the PHA must provide a briefing packet that explains how the PHA determines the total tenant payment for a family, the family obligations under the program, and applicable fair housing information.

Persons with Disabilities

If an applicant family's head or spouse is disabled, the PHA must assure effective communication, in accordance with 24 CFR 8.6, in conducting the oral briefing and in providing the written information packet. This may include making alternative formats available (see Chapter 2). In addition, the PHA must have a mechanism for referring a family that includes a member with a mobility impairment to an appropriate accessible PBV unit.

Persons with Limited English Proficiency

The PHA should take reasonable steps to assure meaningful access by persons with limited English proficiency in accordance with Title VI of the Civil Rights Act of 1964 and Executive Order 13166 (see Chapter 2).

17-VI.F. OWNER SELECTION OF TENANTS

The owner is responsible for developing written tenant selection procedures that are consistent with the purpose of improving housing opportunities for very low-income families and reasonably related to program eligibility and an applicant's ability to fulfill their obligations under the lease. An owner must promptly notify in writing any rejected applicant of the grounds for any rejection [24 CFR 983.253(a)(2) and (a)(3)].

Leasing [24 CFR 983.253(a)]

During the term of the HAP contract, the owner must lease contract units to eligible families that are selected and referred by the PHA from the PHA's waiting list. The contract unit leased to the family must be the appropriate size unit for the size of the family, based on the PHA's subsidy standards.

Filling Vacancies [24 CFR 983.254(a)]

The owner must promptly notify the PHA of any vacancy or expected vacancy in a contract unit. After receiving such notice, the PHA must make every reasonable effort to promptly refer a sufficient number of families for the owner to fill such vacancies. The PHA and the owner must make reasonable efforts to minimize the likelihood and length of any vacancy.

PHA Policy

The owner must notify the PHA in writing (mail, fax, or email) within five business days of learning about any vacancy or expected vacancy.

The PHA will make every reasonable effort to refer families to the owner within 30 days of receiving such notice from the owner.

Reduction in HAP Contract Units Due to Vacancies [24 CFR 983.254(b)]

If any contract units have been vacant for 120 or more days since owner notice of the vacancy, the PHA may give notice to the owner amending the HAP contract to reduce the number of contract units by subtracting the number of contract units (according to the bedroom size) that have been vacant for this period.

PHA Policy

If any contract units have been vacant for 120 days, the PHA will give notice to the owner that the HAP contract will be amended to reduce the number of contract units that have been vacant for this period. The PHA will provide the notice to the owner within 10 business days of the 120th day of the vacancy. The amendment to the HAP contract will be effective the 1st day of the month following the date of the PHA's notice.

17-VI.G. TENANT SCREENING [24 CFR 983.255]

PHA Responsibility

The PHA is not responsible or liable to the owner or any other person for the family's behavior or suitability for tenancy. However, the PHA may opt to screen applicants for family behavior or suitability for tenancy and may deny applicants based on such screening.

PHA Policy

The PHA will not conduct screening to determine a PBV applicant family's suitability for tenancy.

The PHA must provide the owner with an applicant family's current and prior address (as shown in PHA records) and the name and address (if known by the PHA) of the family's current landlord and any prior landlords.

In addition, the PHA may offer the owner other information the PHA may have about a family, including information about the tenancy history of family members or about drug trafficking and criminal activity by family members. The PHA must provide applicant families a description of the PHA policy on providing information to owners, and the PHA must give the same types of information to all owners.

The PHA may not disclose to the owner any confidential information provided in response to a request for documentation of domestic violence, dating violence, sexual assault, stalking, or human trafficking, except at the written request or with the written consent of the individual providing the documentation [see 24 CFR 5.2007(a)(4)].

PHA Policy

The PHA will inform owners of their responsibility to screen prospective tenants, and will provide owners with the required known name and address information, at the time of the turnover inspection or before. The PHA will not provide any additional information to the owner, such as tenancy history, criminal history, etc.

Owner Responsibility

The owner is responsible for screening and selection of the family to occupy the owner's unit. When screening families the owner may consider a family's background with respect to the following factors:

- Payment of rent and utility bills;
- Caring for a unit and premises;
- Respecting the rights of other residents to the peaceful enjoyment of their housing;
- Drug-related criminal activity or other criminal activity that is a threat to the health, safety, or property of others; and
- Compliance with other essential conditions of tenancy.

PART VII: OCCUPANCY

17-VII.A. OVERVIEW

After an applicant has been selected from the waiting list, determined eligible by the PHA, referred to an owner and determined suitable by the owner, the family will sign the lease and occupancy of the unit will begin.

17-VII.B. LEASE [24 CFR 983.256]

The tenant must have legal capacity to enter a lease under state and local law. *Legal capacity* means that the tenant is bound by the terms of the lease and may enforce the terms of the lease against the owner.

Form of Lease [24 CFR 983.256(b)]

The tenant and the owner must enter into a written lease agreement that is signed by both parties. If an owner uses a standard lease form for rental units to unassisted tenants in the locality or premises, the same lease must be used for assisted tenants, except that the lease must include a HUD-required tenancy addendum. The tenancy addendum must include, word-for-word, all provisions required by HUD.

If the owner does not use a standard lease form for rental to unassisted tenants, the owner may use another form of lease, such as a PHA model lease.

The PHA may review the owner's lease form to determine if the lease complies with state and local law. If the PHA determines that the lease does not comply with state or local law, the PHA may decline to approve the tenancy.

PHA Policy

The PHA will not review the owner's lease for compliance with state or local law.

Lease Requirements [24 CFR 983.256(c)]

The lease for a PBV unit must specify all of the following information:

- The names of the owner and the tenant;
- The unit rented (address, apartment number, if any, and any other information needed to identify the leased contract unit);
- The term of the lease (initial term and any provision for renewal);
- The amount of the tenant rent to owner, which is subject to change during the term of the lease in accordance with HUD requirements;
- A specification of the services, maintenance, equipment, and utilities that will be provide by the owner; and
- The amount of any charges for food, furniture, or supportive services.

Tenancy Addendum [24 CFR 983.256(d)]

The tenancy addendum in the lease must state:

- The program tenancy requirements;
- The composition of the household as approved by the PHA (the names of family members and any PHA-approved live-in aide);
- All provisions in the HUD-required tenancy addendum must be included in the lease. The terms of the tenancy addendum prevail over other provisions of the lease.

Initial Term and Lease Renewal [24 CFR 983.256(f)]

The initial lease term must be for at least one year. The lease must provide for automatic renewal after the initial term of the lease in either successive definitive terms (e.g. month-to-month or year-to-year) or an automatic indefinite extension of the lease term. For automatic indefinite extension of the lease term, the lease terminates if any of the following occur:

- The owner terminates the lease for good cause
- The tenant terminates the lease
- The owner and tenant agree to terminate the lease
- The PHA terminates the HAP contract
- The PHA terminates assistance for the family

Changes in the Lease [24 CFR 983.256(e)]

If the tenant and owner agree to any change in the lease, the change must be in writing, and the owner must immediately give the PHA a copy of all changes.

The owner must notify the PHA in advance of any proposed change in the lease regarding the allocation of tenant and owner responsibilities for utilities. Such changes may only be made if approved by the PHA and in accordance with the terms of the lease relating to its amendment. The PHA must redetermine reasonable rent, in accordance with program requirements, based on any change in the allocation of the responsibility for utilities between the owner and the tenant. The redetermined reasonable rent will be used in calculation of the rent to owner from the effective date of the change.

Owner Termination of Tenancy [24 CFR 983.257]

With two exceptions, the owner of a PBV unit may terminate tenancy for the same reasons an owner may in the tenant-based voucher program (see Section 12-III.B. and 24 CFR 982.310). In the PBV program, terminating tenancy for "good cause" does not include doing so for a business or economic reason, or a desire to use the unit for personal or family use or other non-residential purpose.

Tenant Absence from the Unit [24 CFR 983.256(g) and 982.312(a)]

The lease may specify a maximum period of family absence from the unit that may be shorter than the maximum period permitted by PHA policy. According to program requirements, the family's assistance must be terminated if they are absent from the unit for more than 180 consecutive days. PHA termination of assistance actions due to family absence from the unit are subject to 24 CFR 981.312, except that the unit is not terminated from the HAP contract if the family is absent for longer than the maximum period permitted.

Continuation of Housing Assistance Payments [24 CFR 982.258]

Housing assistance payments shall continue until the tenant rent equals the rent to owner. The cessation of housing assistance payments at such point will not affect the family's other rights under its lease, nor will such cessation preclude the resumption of payments as a result of later changes in income, rents, or other relevant circumstances if such changes occur within 180 days following the date of the last housing assistance payment by the PHA. After the 180-day period, the unit shall be removed from the HAP contract pursuant to 24 CFR 983.211.

PHA Policy

If a participating family receiving zero assistance experiences a change in circumstances that would result in a HAP payment to the owner, the family must notify the PHA of the change and request an interim reexamination before the expiration of the 180-day period.

Security Deposits [24 CFR 983.259]

The owner may collect a security deposit from the tenant. The PHA may prohibit security deposits in excess of private market practice, or in excess of amounts charged by the owner to unassisted tenants.

PHA Policy

The PHA prohibits the owner from collecting security deposits in excess of amounts charged by the owner to unassisted tenants.

When the tenant moves out of a contract unit, the owner, subject to state and local law, may use the security deposit, including any interest on the deposit, in accordance with the lease, as reimbursement for any unpaid tenant rent, damages to the unit, or other amounts owed by the tenant under the lease.

The owner must give the tenant a written list of all items charged against the security deposit and the amount of each item. After deducting the amount used to reimburse the owner, the owner must promptly refund the full amount of the balance to the tenant.

If the security deposit does not cover the amount owed by the tenant under the lease, the owner may seek to collect the balance from the tenant. The PHA has no liability or responsibility for payment of any amount owed by the family to the owner.

17-VII.C. MOVES

Overcrowded, Under-Occupied, and Accessible Units [24 CFR 983.260]

If the PHA determines that a family is occupying a wrong size unit, based on the PHA's subsidy standards, or a unit with accessibility features that the family does not require, and the unit is needed by a family that does require the features, the PHA must promptly notify the family and the owner of this determination, and the PHA must offer the family the opportunity to receive continued housing assistance in another unit.

PHA Policy

The PHA will notify the family and the owner of the family's need to move based on the occupancy of a wrong-size or accessible unit within 10 business days of the PHA's determination. The PHA will offer the family the following types of continued assistance in the following order, based on the availability of assistance:

PBV assistance in the same building or project;

PBV assistance in another project; and

Tenant-based voucher assistance.

If the PHA offers the family a tenant-based voucher, the PHA must terminate the housing assistance payments for a wrong-sized or accessible unit at the earlier of the expiration of the term of the family's voucher (including any extension granted by the PHA) or the date upon which the family vacates the unit. If the family does not move out of the wrong-sized unit or accessible unit by the expiration of the term of the family's voucher, the PHA must remove the unit from the HAP contract.

If the PHA offers the family another form of assistance that is not a tenant-based voucher, and the family does not accept the offer, does not move out of the PBV unit within a reasonable time as determined by the PHA, or both, the PHA must terminate the housing assistance payments for the unit at the expiration of a reasonable period as determined by the PHA and remove the unit from the HAP contract.

PHA Policy

When the PHA offers a family another form of assistance that is not a tenant-based voucher, the family will be given 120 days from the date of the offer to accept the offer and move out of the PBV unit. If the family does not move out within this 120-day time frame, the PHA will terminate the housing assistance payments at the expiration of this 120-day period.

The PHA may make exceptions to this 120-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member.

Family Right to Move [24 CFR 983.261]

The family may terminate the lease at any time after the first year of occupancy. The family must give advance written notice to the owner in accordance with the lease and provide a copy of such notice to the PHA. If the family wishes to move with continued tenant-based assistance, the family must contact the PHA to request the rental assistance prior to providing notice to terminate the lease.

If the family terminates the lease in accordance with these requirements, the PHA is required to offer the family the opportunity for continued tenant-based assistance, in the form of a voucher or other comparable tenant-based rental assistance. If voucher or other comparable tenant-based assistance is not immediately available upon termination of the family's lease in the PBV unit, the PHA must give the family priority to receive the next available opportunity for continued tenant-based assistance.

If the family terminates the assisted lease before the end of the first year, the family relinquishes the opportunity for continued tenant-based assistance.

Emergency Transfers under VAWA [Notice PIH 2017-08]

Except where special consideration is needed for the project-based voucher program, the PHA will follow VAWA policies as outlined in Chapter 16 Part IX of this administrative plan, including using the Emergency Transfer Plan as the basis for PBV transfers under VAWA (Exhibit 16-4).

HUD requires that the PHA include policies that address when a victim has been living in a unit for less than a year or when a victim seeks to move sooner than a tenant-based voucher is available.

PHA Policy

When the victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking has lived in the unit for less than one year, the PHA will provide several options for continued assistance.

The PHA will first try to transfer the participant to another PBV unit in the same development or transfer to a different development where the PHA has PBV units. The PHA will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible.

If no units are available for an internal transfer, or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may receive continued assistance through an external transfer to either tenant-based rental assistance (HCV) or assistance in the PHA's public housing program. Such a decision will be made by the PHA based on the availability of tenant-based vouchers and/or vacancies in public housing units. Such families must be selected from the waiting list for the applicable program. The PHA has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking in both its HCV and public housing programs in order to expedite this process. See Section 4-III.C. of this administrative plan.

If a victim wishes to move after a year of occupancy in the unit, but no tenant-based vouchers are available, the PHA will offer the participant an internal transfer to another PBV unit in the same development or a transfer to a different development where the PHA has PBV units. The PHA will expedite the administrative processes in this case in an effort to conduct the transfer as quickly as possible.

If no units are available for an internal transfer, or if there is reasonable cause to believe that such a transfer would put the victim in jeopardy, the participant may receive continued assistance through an external transfer to the PHA's public housing program. The PHA has adopted a waiting list preference for victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking as part of the public housing ACOP in order to expedite this process.

17-VII.D. EXCEPTIONS TO THE OCCUPANCY CAP [24 CFR 983.262]

As of April 17, 2018, the PHA may not pay housing assistance under a PBV HAP contract for more than the greater of 25 units or 25 percent of the number of dwelling units in a project unless:

- The units are exclusively for elderly families
- The units are for households eligible for supportive services available to all families receiving PBV assistance in the project

If the project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year estimates, the project cap is the greater of 25 units or 40 percent (instead of 25 percent) of the units in the project [FR Notice 7/14/17].

If a family at the time of initial tenancy is receiving and while the resident of an excepted unit has received Family Self-Sufficiency (FSS) supportive services or any other service as defined by the PHA and successfully completes the FSS contract of participation or the supportive services requirement, the unit continues to count as an excepted unit for as long as the family resides in the unit. However, if the FSS family fails to successfully complete the FSS contract of participation or supportive services objective and consequently is no longer eligible for the supportive services, the family must vacate the unit within a reasonable period of time established by the PHA, and the PHA shall cease paying HAP on behalf of the family.

Further, when a family (or remaining members of a family) residing in an excepted unit no longer meets the criteria for a "qualifying family" because the family is no longer an elderly family due to a change in family composition, the PHA has the discretion to allow the family to remain in the excepted unit. If the PHA does not exercise this discretion, the family must vacate the unit within a reasonable period of time established by the PHA, and the PHA must cease paying housing assistance payments on behalf of the non-qualifying family.

Individuals in units with supportive services who choose to no longer participate in a service or who no longer qualify for services they qualified for at the time of initial occupancy cannot subsequently be denied continued housing opportunity because of this changed circumstance. A PHA or owner cannot determine that a participant's needs exceed the level of care offered by qualifying services or require that individuals be transitioned to different projects based on service needs.

If the family fails to vacate the unit within the established time, the unit must be removed from the HAP contract unless the project is partially assisted, and it is possible for the HAP contract to be amended to substitute a different unit in the building in accordance with program requirements; or the owner terminates the lease and evicts the family. The housing assistance payments for a family residing in an excepted unit that is not in compliance with its family obligations to comply with supportive services requirements must be terminated by the PHA.

The PHA may allow a family that initially qualified for occupancy of an excepted unit based on elderly family status to continue to reside in a unit, where through circumstances beyond the control of the family (e.g., death of the elderly family member or long-term or permanent hospitalization or nursing care), the elderly family member no longer resides in the unit. In this case, the unit may continue to be counted as an excepted unit for as long as the family resides in that unit. Once the family vacates the unit, in order to continue as an excepted unit under the HAP contract, the unit must be made available to and occupied by a qualified family.

PHA Policy

The PHA will allow families who initially qualified to live in an excepted unit to remain when circumstances change due to circumstances beyond the remaining family members' control.

In all other cases, the PHA will provide written notice to the family and owner within 10 business days of making the determination. The family will be given 120 days from the date of the notice to move out of the PBV unit. If the family does not move out within this 120-day time frame, the PHA will terminate the housing assistance payments at the expiration of this 120-day period.

The PHA may make exceptions to this 120-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member.

PART VIII: DETERMINING RENT TO OWNER

17-VIII.A. OVERVIEW

The amount of the initial rent to an owner of units receiving PBV assistance is established at the beginning of the HAP contract term. Although for rehabilitated or newly constructed housing, the agreement to enter into HAP Contract (Agreement) states the estimated amount of the initial rent to owner, the actual amount of the initial rent to owner is established at the beginning of the HAP contract term.

During the tem of the HAP contract, the rent to owner is redetermined at the owner's request in accordance with program requirements, and at such time that there is a ten percent or greater decrease in the published FMR.

17-VIII.B. RENT LIMITS [24 CFR 983.301]

Except for certain tax credit units (discussed below), the rent to owner must not exceed the lowest of the following amounts:

- An amount determined by the PHA, not to exceed 110 percent of the applicable fair market rent (or any HUD-approved exception payment standard) for the unit bedroom size minus any utility allowance;
- The reasonable rent; or
- The rent requested by the owner.

Certain Tax Credit Units [24 CFR 983.301(c)]

For certain tax credit units, the rent limits are determined differently than for other PBV units. Different limits apply to contract units that meet all of the following criteria:

- The contract unit receives a low-income housing tax credit under the Internal Revenue Code of 1986;
- The contract unit is not located in a qualified census tract;
- There are comparable tax credit units of the same bedroom size as the contract unit in the same project, and the comparable tax credit units do not have any form of rental assistance other than the tax credit; and
- The tax credit rent exceeds 110 percent of the fair market rent or any approved exception payment standard;

For contract units that meet all of these criteria, the rent to owner must not exceed the lowest of:

- The tax credit rent minus any utility allowance;
- The reasonable rent; or
- The rent requested by the owner.

Definitions

A *qualified census tract* is any census tract (or equivalent geographic area defined by the Bureau of the Census) in which at least 50 percent of households have an income of less than 60 percent of Area Median Gross Income (AMGI), or where the poverty rate is at least 25 percent and where the census tract is designated as a qualified census tract by HUD.

Tax credit rent is the rent charged for comparable units of the same bedroom size in the project that also receive the low-income housing tax credit but do not have any additional rental assistance (e.g., tenant-based voucher assistance).

Reasonable Rent [24 CFR 983.301(e) and 983.302(c)(2)]

The PHA must determine reasonable rent in accordable with 24 CFR 983.303. The rent to owner for each contract unit may at no time exceed the reasonable rent, except in cases where the PHA has elected within the HAP contract not to reduce rents below the initial rent to owner and, upon redetermination of the rent to owner, the reasonable rent would result in a rent below the initial rent. However, the rent to owner must be reduced in the following cases:

- To correct errors in calculations in accordable with HUD requirements
- If additional housing assistance has been combined with PBV assistance after the execution of the initial HAP contract and a rent decrease is required pursuant to 24 CFR 983.55
- If a decrease in rent to owner is required based on changes in the allocation of the responsibility for utilities between owner and tenant

If the PHA has not elected within the HAP contract to establish the initial rent to owner as the rent floor, the rent to owner shall not at any time exceed the reasonable rent.

PHA Policy

The PHA will elect within the HAP contract not to reduce rents below the initial level, with the exception of circumstances listed in 24 CFR 983.302(c)(2). If, upon redetermination of the rent to owner, the reasonable rent would result in a rent below the initial rent, the PHA will use the higher initial rent to owner amount.

Use of FMRs, Exception Payment Standards, and Utility Allowances [24 CFR 983.301(f)]

When determining the initial rent to owner, the PHA must use the most recently published FMR in effect and the utility allowance schedule in effect at execution of the HAP contract. When redetermining the rent to owner, the PHA must use the most recently published FMR and the utility allowance schedule in effect at the time of redetermination. At its discretion, the PHA may for initial rent, use the amounts in effect at any time during the 30-day period immediately before the beginning date of the HAP contract, or for redeterminations of rent, the 30-day period immediately before the redetermination date.

Any HUD-approved exception payment standard amount under the tenant-based voucher program also applies to the project-based voucher program. HUD will not approve a different exception payment stand amount for use in the PBV program.

Likewise, the PHA may not establish or apply different utility allowance amounts for the PBV program. The same utility allowance schedule applies to both the tenant-based and project-based voucher programs.

PHA Policy

Upon written request by the owner, the PHA will consider using the FMR or utility allowances in effect during the 60-day period before the start date of the HAP, or redetermination of rent. The owner must explain the need to use the previous FMRs or utility allowances and include documentation in support of the request. The PHA will review and make a decision based on the circumstances and merit of each request.

In addition to considering a written request from an owner, the PHA may decide to use the FMR or utility allowances in effect during the 60-day period before the start date of the HAP, or redetermination of rent, if the PHA determines it is necessary due to PHA budgetary constraints.

Use of Small Area FMRs (SAFMRs) [24 CFR 888.113(h)]

While small area FMRs (SAFMRs) do not apply to PBV projects, PHAs that operate a tenant-based program under SAFMRs may apply SAFMRs to all future PBV HAP contracts. If the PHA adopts this policy, it must apply to all future PBV projects and the PHA's entire jurisdiction. The PHA and owner may not subsequently choose to revert back to use of the FMRs once the SAFMRs have been adopted, even if the PHA subsequently changes its policy.

Further, the PHA may apply SAFMRs to current PBV projects where the notice of owner selection was made on or before the effective date of PHA implementation, provided the owner is willing to mutually agree to doing so and the application is prospective. The PHA and owner may not subsequently choose to revert back to use of the FMRs once the SAFMRs have been adopted, even if the PHA subsequently changes its policy. If rents increase as a result of the use of SAFMRs, the rent increase may not be effective until the first anniversary of the HAP contract.

PHA Policy

The PHA will not apply SAFMRs to the PHA's PBV program.

Redetermination of Rent [24 CFR 983.302]

The PHA must redetermine the rent to owner upon the owner's request or when there is a 10 percent or greater decrease in the published FMR.

Rent Increase

If an owner wishes to request an increase in the rent to owner from the PHA, it must be requested at the annual anniversary of the HAP contract (see Section 17-V.D.). The request must be in writing and in the form and manner required by the PHA. The PHA may only make rent increases in accordance with the rent limits described previously. There are no provisions in the PBV program for special adjustments (e.g., adjustments that reflect increases in the actual and necessary expenses of owning and maintaining the units which have resulted from substantial general increases in real property taxes, utility rates, or similar costs).

PHA Policy

An owner's request for a rent increase must be submitted to the PHA 60 days prior to the anniversary date of the HAP contract and must include the new rent amount the owner is proposing.

The PHA may not approve, and the owner may not receive any increase of rent to owner, until and unless the owner has complied with requirements of the HAP contract, including compliance with NSPIRE. The owner may not receive any retroactive increase of rent for any period of noncompliance.

Rent Decrease

If there is a decrease in the rent to owner, as established in accordance with program requirements such as a change in the FMR or exception payment standard, or reasonable rent amount, the rent to owner must be decreased regardless of whether the owner requested a rent adjustment, except where the PHA has elected within the HAP contract to not reduce rents below the initial rent under the initial HAP contract.

Notice of Rent Change

The rent to owner is redetermined by written notice by the PHA to the owner specifying the amount of the redetermined rent. The PHA notice of rent adjustment constitutes an amendment of the rent to owner specified in the HAP contract. The adjusted amount of rent to owner applies for the period of 12 calendar months from the annual anniversary of the HAP contract.

PHA Policy

The PHA will provide the owner with at least 30 days written notice of any change in the amount of rent to owner.

PHA-Owned Units [24 CFR 983.301(g)]

For PHA-owned PBV units, the initial rent to owner and the annual redetermination of rent at the anniversary of the HAP contract are determined by the independent entity approved by HUD. The PHA must use the rent to owner established by the independent entity.

17-VIII.C. REASONABLE RENT [24 CFR 983.303]

At the time the initial rent is established and all times during the term of the HAP contract, the rent to owner for a contract unit may not exceed the reasonable rent for the unit as determined by the PHA, except where the PHA has elected within the HAP contract to not reduce rents below the initial rent under the initial HAP contract.

When Rent Reasonable Determinations Are Required

The PHA must redetermine the reasonable rent for a unit receiving PBV assistance whenever any of the following occur:

- There is a 10 percent or greater decrease in the published FMR in effect 60 days before the contract anniversary (for the unit sizes specified in the HAP contract) as compared with the FMR that was in effect one year before the contract anniversary date;
- The PHA approves a change in the allocation of responsibility for utilities between the owner and the tenant;
- The HAP contract is amended to substitute a different contract unit in the same building or project; or
- There is any other change that may substantially affect the reasonable rent.

How to Determine Reasonable Rent

The reasonable rent of a unit receiving PBV assistance must be determined by comparison to rent for other comparable unassisted units. When making this determination, the PHA must consider factors that affect market rent. Such factors include the location, quality, size, type and age of the unit, as well as the amenities, housing services maintenance, and utilities to be provided by the owner.

Comparability Analysis

For each unit, the comparability analysis must use at least three comparable units in the private unassisted market. This may include units in the premises or project that is receiving project-based assistance. The analysis must show how the reasonable rent was determined, including major differences between the contract units and comparable unassisted units, and must be retained by the PHA. The comparability analysis may be performed by PHA staff or by another qualified person or entity. Those who conduct these analyses or are involved in determining the housing assistance payment based on the analyses may not have any direct or indirect interest in the property.

PHA-Owned Units

For PHA-owned units, the amount of the reasonable rent must be determined by an independent agency approved by HUD in accordance with PBV program requirements. The independent entity must provide a copy of the determination of reasonable rent for PHA-owned units to the PHA and to the HUD field office where the project is located.

Owner Certification of Reasonable Rent

By accepting each monthly housing assistance payment, the owner certifies that the rent to owner is not more than rent charged by the owner for other comparable unassisted units in the premises. At any time, the PHA may require the owner to submit information on rents charged by the owner for other units in the premises or elsewhere.

17-VIII.D. EFFECT OF OTHER SUBSIDY AND RENT CONTROL

In addition to the rent limits discussed in Section 17-VIII.B above, other restrictions may limit the amount of rent to owner in a PBV unit. In addition, certain types of subsidized housing are not even eligible to receive PBV assistance (see Section 17-II.D).

Other Subsidy [24 CFR 983.304]

To comply with HUD subsidy layering requirements, at the discretion of HUD or its designee, a PHA shall reduce the rent to owner because of other governmental subsidies, including tax credits or tax exemptions, grants, or other subsidized funding.

For units receiving assistance under the HOME program, rents may not exceed rent limits as required by that program.

For units in any of the following types of federally subsidized projects, the rent to owner may not exceed the subsidized rent (basic rent) or tax credit rent as determined in accordance with requirements for the applicable federal program:

- An insured or non-insured Section 236 project;
- A formerly insured or non-insured Section 236 project that continues to receive Interest Reduction Payment following a decoupling action;
- A Section 221(d)(3) below market interest rate (BMIR) project;
- A Section 515 project of the Rural Housing Service;
- Any other type of federally subsidized project specified by HUD.

Combining Subsidy

Rent to owner may not exceed any limitation required to comply with HUD subsidy layering requirements.

Rent Control [24 CFR 983.305]

In addition to the rent limits set by PBV program regulations, the amount of rent to owner may also be subject to rent control or other limits under local, state, or federal law.

PART IX: PAYMENTS TO OWNER

17-IX.A. HOUSING ASSISTANCE PAYMENTS [24 CFR 983.351]

During the term of the HAP contract, the PHA must make housing assistance payments to the owner in accordance with the terms of the HAP contract. During the term of the HAP contract, payments must be made for each month that a contract unit complies with NSPIRE standards and is leased to and occupied by an eligible family. The housing assistance payment must be paid to the owner on or about the first day of the month for which payment is due, unless the owner and the PHA agree on a later date.

Except for discretionary vacancy payments, the PHA may not make any housing assistance payment to the owner for any month after the month when the family moves out of the unit (even if household goods or property are left in the unit).

The amount of the housing assistance payment by the PHA is the rent to owner minus the tenant rent (total tenant payment minus the utility allowance).

In order to receive housing assistance payments, the owner must comply with all provisions of the HAP contract. Unless the owner complies with all provisions of the HAP contract, the owner does not have a right to receive housing assistance payments.

17-IX.B. VACANCY PAYMENTS [24 CFR 983.352]

If an assisted family moves out of the unit, the owner may keep the housing assistance payment for the calendar month when the family moves out. However, the owner may not keep the payment if the PHA determines that the vacancy is the owner's fault.

PHA Policy

If the PHA determines that the owner is responsible for a vacancy and, as a result, is not entitled to the keep the housing assistance payment, the PHA will notify the landlord of the amount of housing assistance payment that the owner must repay. The PHA will require the owner to repay the amount owed in accordance with the policies in Section 16-IV.B.

At the discretion of the PHA, the HAP contract may provide for vacancy payments to the owner. The PHA may only make vacancy payments if:

- The owner gives the PHA prompt, written notice certifying that the family has vacated the unit and identifies the date when the family moved out (to the best of the owner's knowledge);
- The owner certifies that the vacancy is not the fault of the owner and that the unit was vacant during the period for which payment is claimed;
- The owner certifies that it has taken every reasonable action to minimize the likelihood and length of vacancy; and
- The owner provides any additional information required and requested by the PHA to verify that the owner is entitled to the vacancy payment.

The owner must submit a request for vacancy payments in the form and manner required by the PHA and must provide any information or substantiation required by the PHA to determine the amount of any vacancy payment.

PHA Policy

If an owner's HAP contract calls for vacancy payments to be made, and the owner wishes to receive vacancy payments, the owner must have properly notified the PHA of the vacancy in accordance with the policy in Section 17-VI.F. regarding filling vacancies.

In order for a vacancy payment request to be considered, it must be made within 10 business days of the end of the period for which the owner is requesting the vacancy payment. The request must include the required owner certifications and the PHA may require the owner to provide documentation to support the request. If the owner does not provide the information requested by the PHA within 10 business days of the PHA's request, no vacancy payments will be made.

17-IX.C. TENANT RENT TO OWNER [24 CFR 983.353]

The tenant rent is the portion of the rent to owner paid by the family. The amount of tenant rent is determined by the PHA in accordance with HUD requirements. Any changes in the amount of tenant rent will be effective on the date stated in the PHA notice to the family and owner.

The family is responsible for paying the tenant rent (total tenant payment minus the utility allowance). The amount of the tenant rent determined by the PHA is the maximum amount the owner may charge the family for rental of a contract unit. The tenant rent covers all housing services, maintenance, equipment, and utilities to be provided by the owner. The owner may not demand or accept any rent payment from the tenant in excess of the tenant rent as determined by the PHA. The owner must immediately return any excess payment to the tenant.

Tenant and PHA Responsibilities

The family is not responsible for the portion of rent to owner that is covered by the housing assistance payment and the owner may not terminate the tenancy of an assisted family for nonpayment by the PHA.

Likewise, the PHA is responsible only for making the housing assistance payment to the owner in accordance with the HAP contract. The PHA is not responsible for paying tenant rent, or any other claim by the owner, including damage to the unit. The PHA may not use housing assistance payments or other program funds (including administrative fee reserves) to pay any part of the tenant rent or other claim by the owner.

Utility Reimbursements

If the amount of the utility allowance exceeds the total tenant payment, the PHA must pay the amount of such excess to the tenant as a reimbursement for tenant-paid utilities, and the tenant rent to the owner must be zero.

The PHA may pay the utility reimbursement directly to the family or to the utility supplier on behalf of the family. If the PHA chooses to pay the utility supplier directly, the PHA must notify the family of the amount paid to the utility supplier.

PHA Policy

The PHA will make utility reimbursements to the family.

17-IX.D. OTHER FEES AND CHARGES [24 CFR 983.354]

Meals and Supportive Services

With the exception of PBV assistance in assisted living developments, the owner may not require the tenant to pay charges for meals or supportive services. Non-payment of such charges is not grounds for termination of tenancy.

In assisted living developments receiving PBV assistance, the owner may charge for meals or supportive services. These charges may not be included in the rent to owner, nor may the value of meals and supportive services be included in the calculation of the reasonable rent. However, non-payment of such charges is grounds for termination of the lease by the owner in an assisted living development.

Other Charges by Owner

The owner may not charge extra amounts for items customarily included in rent in the locality or provided at no additional cost to unsubsidized tenants in the premises.

EXHIBIT 17-1: PBV DEVELOPMENT INFORMATION

(Fill out one for each development)

Date: [Enter the date on which this form was completed]

DEVELOPMENT INFORMATION

Development Name: [Insert name of PBV development]

Address: [Insert full address of PBV development]

Owner Information: [Insert PBV development owner name and contact information. If development is PHA-owned, enter "PHA-owned."]

Property Management Company: [Insert property management company name and contact information, or enter "None"]

PHA-Owned: [Enter "Yes" or "No." If yes, enter name of independent entity]

Mixed Finance Development: [Enter "Yes" or "No." If yes, list other types of funding (i.e., LIHTC, HOME, etc.) and units to which other funding applies.]

HAP CONTRACT

Effective Date of Contract: [Enter start date of HAP contract]

HOTMA Requirements: [If HAP contract was signed prior to April 18, 2017, enter "Pre-HOTMA." If HAP contract was signed on or after April 18, 2017, enter "Post-HOTMA."]

Term of HAP Contract: [Enter term from HAP contract]

Expiration Date of Contract: [Enter expiration date from HAP contract]

PBV UNITS

	0 BR	1 BR	2 BR	3 BR	4 BR	5 BR	Total
# of Units							
Initial Contract Rent	$	$	$	$	$	$	

Structure Type: [Identify the structure type, i.e. Single Family Detached, Duplex or Two Family, Row House or Town House, Low Rise (3,4 Stories, including Garden Apartment), Highrise (5 or more stories)

Housing Type: [Identify if the units are an Independent Group Residence or Single Room Occupancy]

UTILITY RESPONSIBILITY

[Enter in Accordance with the HAP Exhibit C]

Utility	Fuel Type (Gas, Electric, Oil, Coal, Other)	Paid By (Tenant/Owner)	Provided By (Tenant/Owner)
Heating	Electric	Tenant	Owner
Cooking	Electric	Tenant	Owner
Water Heating	Electric	Tenant	Owner
Other Electric		Tenant	Owner
Water		Owner	Owner
Sewer		Owner	Owner
Trash Collection		Owner	Owner
Air Conditioning		Tenant	Owner
Refrigerator			
Range/Microwave			
Other (specify)			

Accessible Units and Features: [Identify which units are accessible and describe accessibility features or enter "None"]

Target Population: [Describe targeted population in accordance with HAP contract or enter "None"]

Excepted Units: [Identify excepted unit types below or enter "None"]

- **Supportive Services:** [Enter "Yes, see Exhibit D of HAP Contract" or enter "No"]
- **Elderly Units**: [Enter "Yes" or "No." If yes, identify which units are elderly units.]
- **Disabled Units** (only for HAP contracts executed prior to April 18, 2017) [Enter "Yes" or "No." If yes, identify which units are for persons with disabilities.]
- **FUPY/FYI Units:** [Enter "Yes" or "No." If yes, identify which units are FUP units]
- **Are units excepted because they are located in a low-poverty census tract area?:** [Enter "Yes" or "No"]

WAITING LIST AND SELECTION

Waiting List Type: [Enter "Site-based waiting list," "Combined with HCV," "Waiting list for entire PBV program," or "Merged with another assisted housing program"]

Preferences: [Enter "Same as HCV; see Chapter 4" or describe preferences offered. If different from HCV, also note in Section 17.1.B of this policy.]

Preference Verification: [Enter "Same as HCV; see Chapter 7" or describe for each preference listed above. If different from HCV, note in Section 17.1.B of this policy.]

For the PBV program, is the income limit the same as the HCV program? (Note: In mixed finance developments, other income limits may also apply.) [Enter "Same as HCV; see Chapter 3" or clearly describe. If different from HCV, note in Section 17.1.B of this policy.]

OCCUPANCY

Subsidy Standards: [Enter "Same as HCV; see Chapter 5" or describe. If different from HCV, note in Section 17.1.B of this policy]

Vacancy Payments: [Enter in accordance with HAP contract Part 1, e, 2 and Section 17-V.F. within this chapter]

EXHIBIT 17-2: Special Provisions Applying to TPVs Awarded as Part of a Voluntary Conversion of Public Housing Units in Projects that Include RAD PBV Units

[24 CFR Part 972.200; Notice PIH 2019-05; Notice PIH 2019-23]

Under certain circumstances, HUD allows small PHAs to reposition a public housing project (or portion of a project) by voluntarily converting units to tenant-based housing choice voucher assistance. In order to preserve affordable housing for residents of the project, the PHA is given priority to receive replacement tenant protection vouchers (TPVs). As part of the voluntary conversion, the PHA has the option to continue to operate it as rental housing. If so, the PHA or subsequent owner must allow existing families to remain in their units using the TPV in the form of tenant-based assistance. In this situation, however, the PHA may choose to project-base these TPVs in the former public housing project. Families must still be provided with the option to remain in their unit using tenant-based assistance. In order for the PHA to project-base the assistance and include these units on the PBV HAP contract, the family must voluntarily consent in writing to PBV assistance following the requirements in Appendix A of Notice PIH 2019-05. If the family fails to consent to PBV assistance and chooses to remain using tenant-based assistance, the family's unit is excluded from the PBV HAP contract until the family moves out or consents to switching to PBV assistance. In general, all applicable program regulations and guidance for the standard PBV program apply to these units.

The PHA may also convert units in the same former public housing project to the PBV program under the rental assistance demonstration (RAD) program. The RAD statute authorizes HUD to waive certain statutory and regulatory provisions governing the standard PBV program and specify alternative requirements. In order to facilitate the uniform treatment of residents and units at the project, Notice PIH 2019-23 extended some of the alternative requirements to non-RAD PBV units in the converted project (i.e., the TPV units in the project). As such, while PBV TPV units in the converted project generally follow the requirements for the standard PBV program listed in this chapter, where HUD has specified alternative requirements for non-RAD PBV units in the project, PBV TPV units will instead follow the requirements outlined in Chapter 18 of this policy for the RAD PBV program.

RAD Requirements Applicable to Non-RAD units in the Project

Alternative Requirement under RAD as Listed in Notice PIH 2019-23	Standard PBV Policy That Does Not Apply	Applicable Policy in Chapter 18
1.6.A.4. Site Selection – Compliance with PBV Goals	17-II.G. SITE SELECTION STANDARDS applies with the exception of deconcentration of poverty and expanding housing and economic opportunity requirements.	18-II.F. SITE SELECTION STANDARDS
1.6.B.5.d. PBV Site-Specific Utility Allowances	Alternative requirement under RAD. No corresponding policy in Chapter 17.	18-VII.C. UTILITY ALLOWANCES

1.6.C.1. No Rescreening of Tenants upon Conversion	Policies contained in Chapter 3 relating to eligibility do not apply to existing tenants who receive TPVs.	18-V.B. PROHIBITED RESCREENING OF EXISTING TENANTS UPON CONVERSION
1.6.C.2. Right to Return	Alternative requirement under RAD. No corresponding policy in Chapter 17.	18-I.D. RELOCATION REQUIREMENTS
1.6.C.3. Phase-in of Tenant Rent Increases	Alternative requirements under RAD. No corresponding policy in Chapter 17.	18-VIII.D. PHASE-IN OF TENANT RENT INCREASES
1.6.C.4. Family Self Sufficiency (FSS) and Resident Opportunities and Self-Sufficiency Service Coordinator (ROSS-SC) Programs	Not covered in administrative plan.	18-VI.C. PUBLIC HOUSING FSS AND ROSS PARTICIPANTS
1.6.C.5. Resident Participation and Funding	Alternative requirement under RAD. No corresponding policy in Chapter 17.	18-VI.D. RESIDENT PARTICIPATION AND FUNDING
1.6.C.6. Resident Procedural Rights	Policies related to hearings in Chapter 16 apply, with added procedural rights and notice requirements as outlined in Chapter 18.	18-VI.H. RESIDENTS' PROCEDURAL RIGHTS
1.6.C.7. Earned Income Disregard (EID)	Alternative requirements under RAD for in-place residents. New admissions follow policies in Chapter 6.	18-VI.G. EARNED INCOME DISALLOWANCE
1.6.C.8. Jobs Plus	Not covered in administrative plan.	No corresponding policy.
1.6.C.9. When Total Tenant Payment Exceeds Gross Rent	Alternative requirements under RAD for in-place residents. New admissions follow policies in 17-VII.B. LEASE, Continuation of Housing Assistance Payments.	18-VI.B. LEASE, Continuation of Housing Assistance Payments
1.6.C.10. Under-Occupied Unit	Alternative requirements	18-VI.E. MOVES, Overcrowded,

	under RAD for in-place residents. New admissions follow 17-VII.C. MOVES, Overcrowded, Under-Occupied, and Accessible Units	Under-Occupied, and Accessible Units
1.6.D.4. Establishment of Waiting List	Alternative requirements under RAD for initial establishment of the waiting list. Once waiting list is established, follow 17-VI.D. SELECTION FROM THE WAITING LIST	18-V.D. ORGANIZATION OF THE WAITING LIST
1.6.D.10. Initial Certifications and Tenant Rent Calculations	Alternative requirements under RAD for in-place residents. No corresponding policy in Chapter 17.	18-VIII.C. TENANT RENT TO OWNER, Initial Certifications

Note, while Notice PIH 2019-05 states that the PHA must screen families for eligibility for a tenant protection voucher and that families must be below the low-income limit (80 percent of AMI), Notice PIH 2019-23 waives these requirements for residents in projects that include RAD PBV units.

MEMORANDUM

To: County Housing Board of Commissioners

Through: Shannon Koenig, Executive Director and CEO

From: Jennifer Wiegert, Director of Communications and Partnerships

Date: November 10, 2026

Subject: *Landlord Incentives Program Update*

This memo reviews the Landlord Incentives Program's performance during Q2 and Q3 and provides an overview of its progress and outcomes during its first year.

I. Second & Third Quarter Update

The Landlord Incentives Program continued to demonstrate engagement during the second and third quarters of the year. During Q2, the program received nine requests, five of which were approved. All five approved requests were for Excessive Damage reimbursement.

During Q3, the program received 24 requests, with 11 approved across four incentive categories: Excessive Damage reimbursement, Signing Bonus, Security Deposit Assistance, and a mini-grant to support the participation of a new landlord.

Through the end of Q3, County Housing has allocated a total of $57,102.69 toward landlord incentives.

A. Requests Breakdown

Second Quarter (Q2)
Total Requests Received: 9
Total Requests Approved: 5
Approved Incentive Categories: Excessive Damage reimbursement

Third Quarter (Q3)
Total Requests Received: 24
Total Requests Approved: 11
Approved Incentive Categories:

- Excessive Damage reimbursement: 8
- Signing Bonus: 1
- Security Deposit Assistance: 1
- New Landlord Mini-Grant: 1

Financial Allocation Through Q3

The program's cumulative allocation totals $57,102.69, distributed as follows:

- Q1: $18,850.00
- Q2: $13,797.69
- Q3: $24,455.00

II. Summary & Outlook

The Landlord Incentives Program continues to provide financial support to landlords while encouraging participation in the Housing Choice Voucher (HCV) program. Third quarter saw a notable increase in requests compared with Q2, along with utilization across a broader range of incentive categories, including incentives intended to attract new landlords.

As awareness of the program continues to grow, staff are encouraged to promote available incentives when engaging with current and prospective landlords. Reinforcing County Housing's commitment to supporting landlords and helping address challenges that may arise during tenancy can strengthen partnerships, encourage landlord participation, and expand housing opportunities for families served by the HCV program.

Through Q3, the program has allocated $57,102.69 of the $100,000 annual budget, leaving $42,897.31 available for future requests. Staff will continue monitoring request volume, approval trends, and spending to ensure funds are deployed strategically and support the program's goals of strengthening landlord participation and promoting housing stability.

MEMORANDUM

To: County Housing Board of Commissioners

Through: Shannon Koenig, Executive Director and CEO

From: Jennifer Wiegert, Director of Communications and Partnerships

Date: November 10, 2026

Subject: *Customer Service & Engagement Review*

This memo summarizes County Housing's customer service survey results and website engagement analytics, highlighting customer satisfaction levels, opportunities to improve service delivery, and trends in website activity to help inform future customer experience and engagement efforts.

I. Customer Service Survey & Engagement Update

A. Customer Service Update

County Housing received 312 responses to its Customer Satisfaction Survey between January 2026 and October 2026. This survey is administered through our lobby interactions with stakeholders and is sent daily to visitors who access services in our lobby. The results provide valuable insight into how residents, landlords, and other stakeholders experience their interactions with County Housing.

Overall, 55.45% of respondents reported being satisfied or very satisfied, while 31.09% reported being dissatisfied or very dissatisfied. Another 13.46% reported a neutral experience.

Open-ended responses provided additional insight into these results and helped identify opportunities for improvement. Common themes include the need for more timely communication and follow-up, consistent and compassionate customer service, improved access to staff, and faster processing of applications, inspections, and other housing-related requests. Respondents also emphasized the importance of clear program guidance, accessible information, and more effective resolution of concerns.

These findings provide an opportunity to build on the positive experiences reported by lobby visitors while addressing areas where service can improve. Moving forward, our focus will be on strengthening communication, improving service consistency, increasing staff accessibility, and making processes timelier and

more efficient. Our goal is to ensure that residents, landlords, and community partners feel heard, informed, and supported during their interactions with County Housing.

B. Engagement Update

County Housing's website analytics show consistent patterns in the pages visitors are accessing from June through October. The Homepage ranked as the most-viewed page in all five months, while Waitlist Information and Properties consistently ranked among the top four pages.

RentCafe/Your Account also remained a frequently accessed resource, reaching the second-highest position in August. Job Listing and Housing Programs continued to rank among the top seven pages throughout the reporting period.

The rankings help County Housing understand which website resources are most prominent in visitors' activity and can inform future decisions about website content, navigation, and access to services.

II. Attachment

County Housing Website Analytics

County Housing Website Analytics

Board overview | June–October 2026

What the rankings show:

Homepage ranked #1 in all five months.

Waitlist Information and Properties pages remained among the top pages every month.

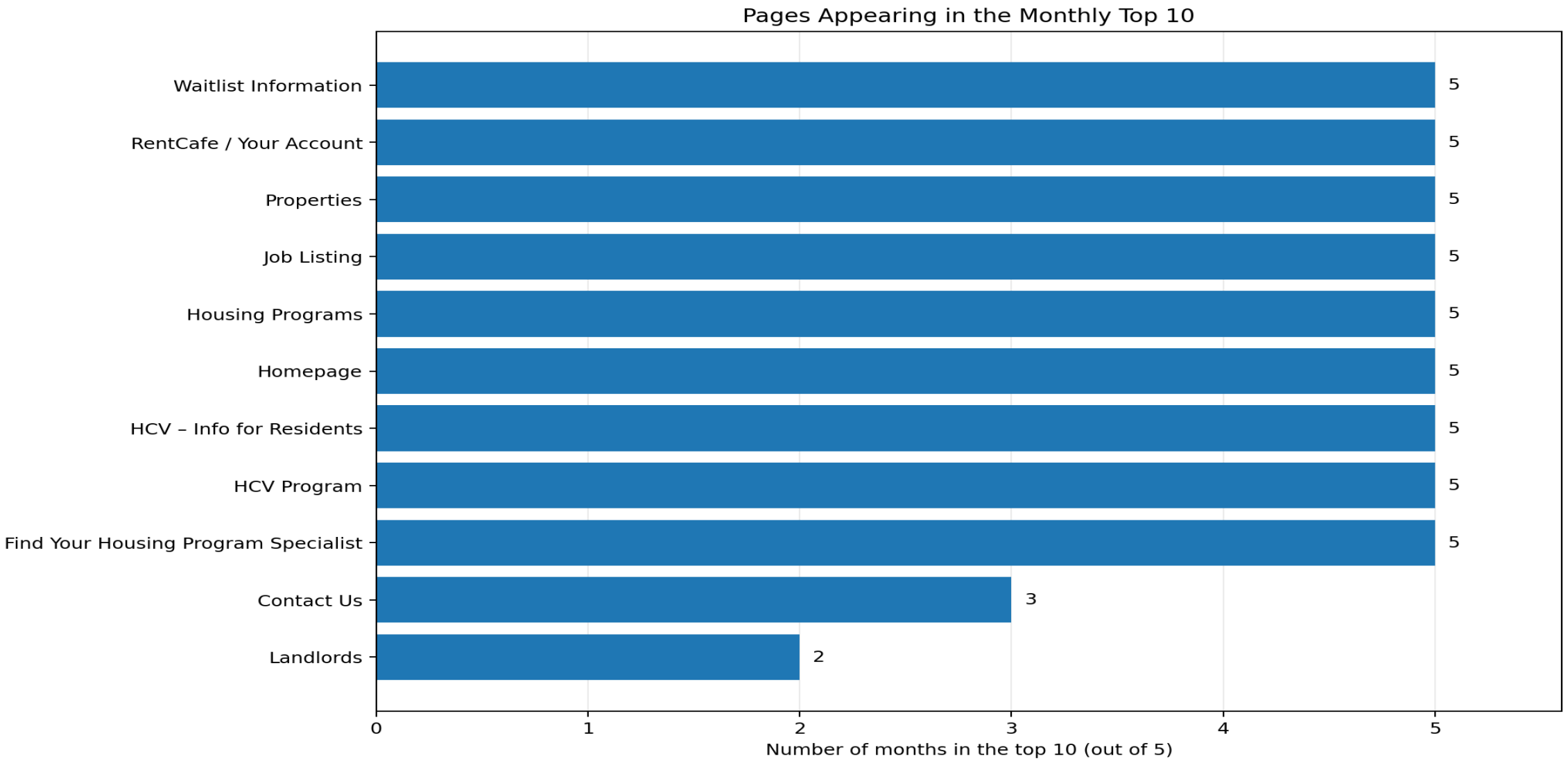
RentCafe/Your Account page ranked in the top five every month, reaching #2 in August.

Job Listing and Housing Programs pages appeared in the top seven in every month.

Contact Us page appeared in the top 10 from August through October; Landlords appeared in June and July only.

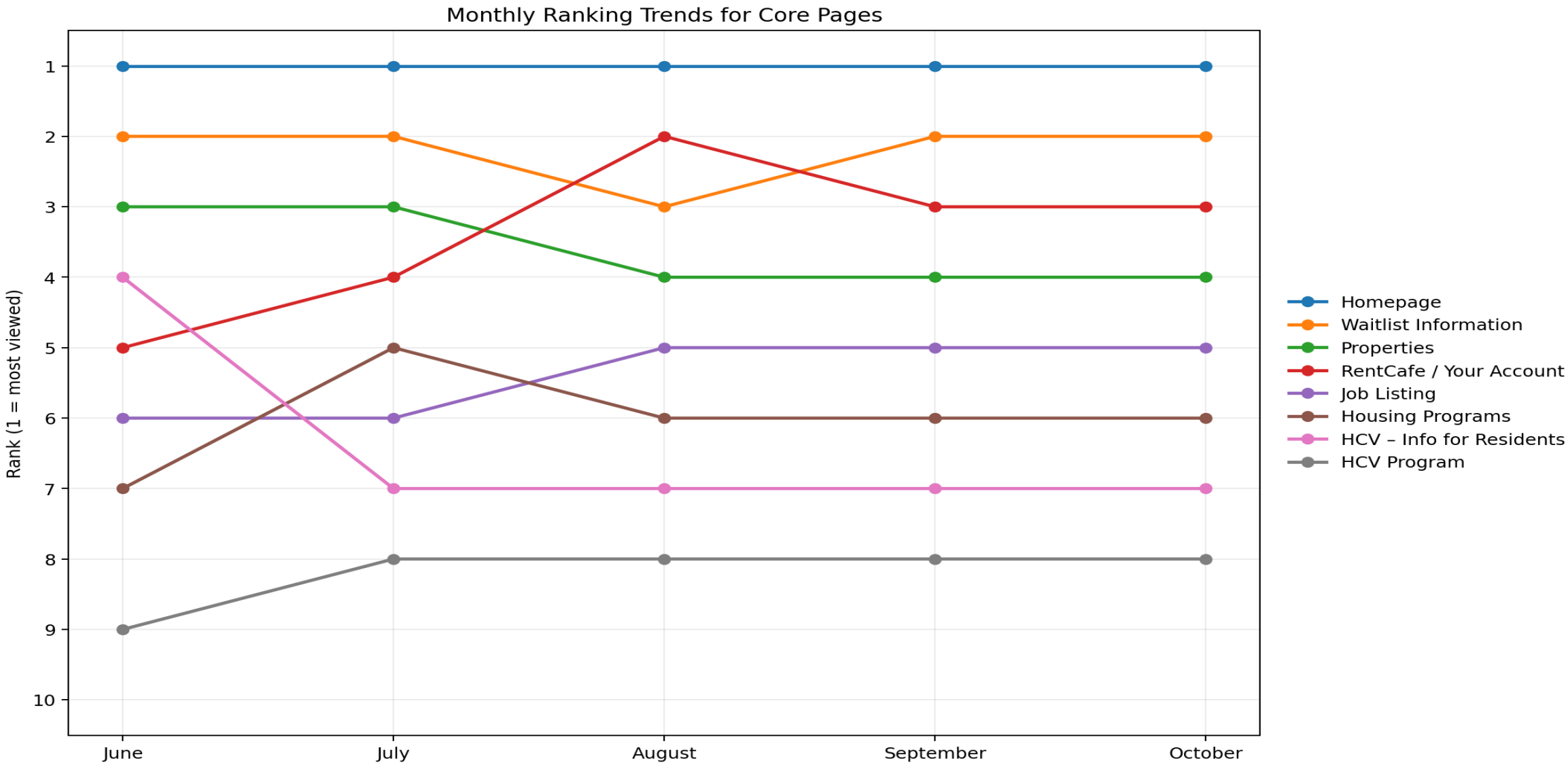
Consistency Across the Five-Month Period

Count of months each page appeared in the monthly top 10



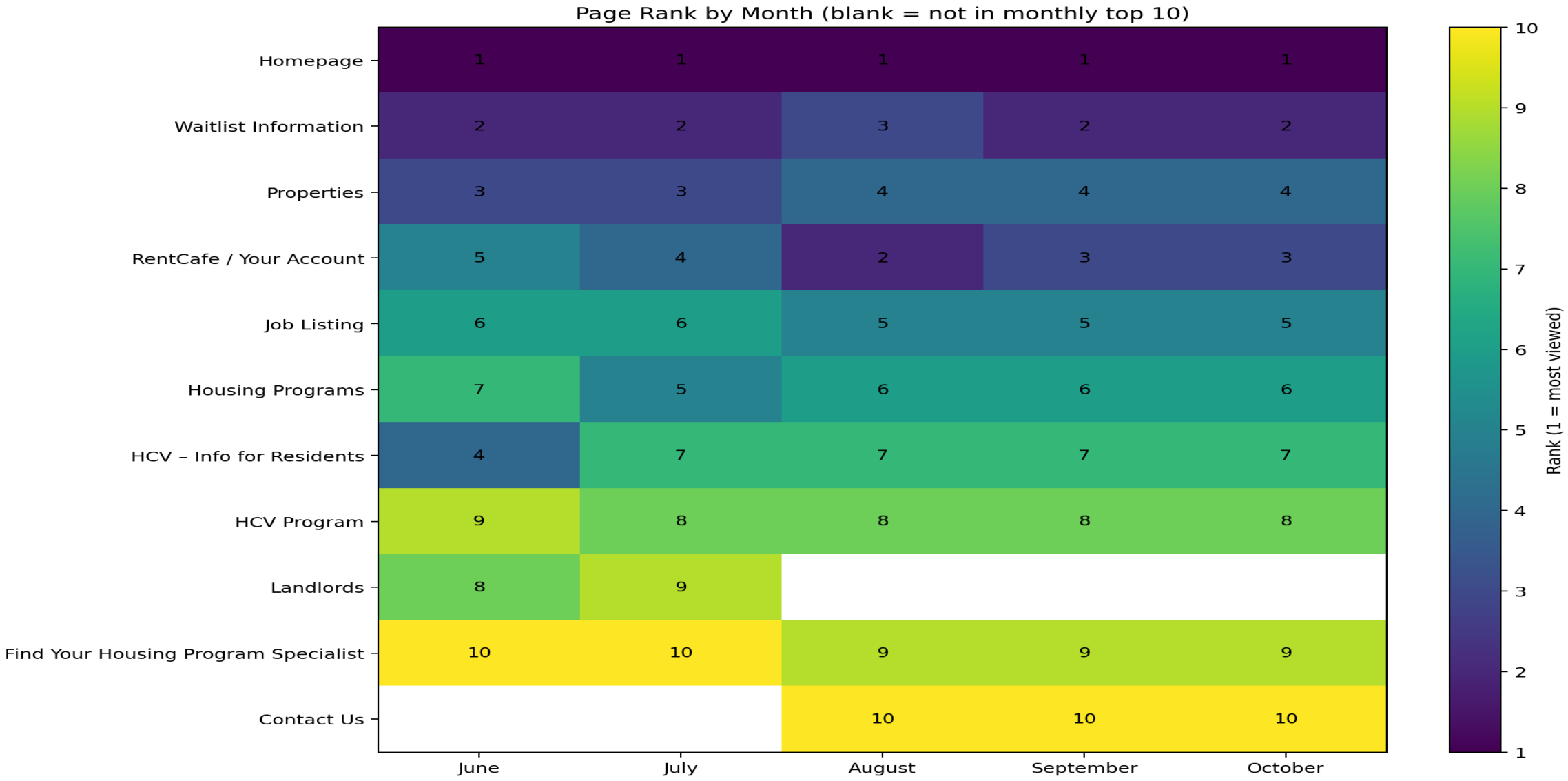
Ranking Trends for Core Pages

Lower rank number indicates a higher position in the list



Monthly Top-10 Rankings at a Glance

Numbers indicate rank; blank cells indicate the page was not listed in that month's top 10. October matches September.



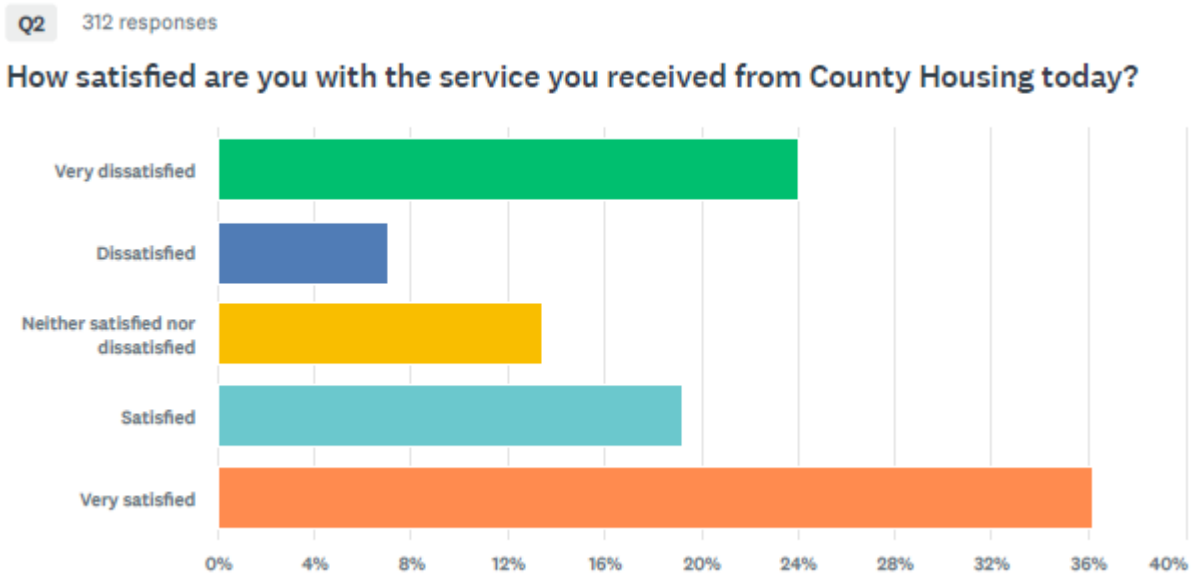
County Housing Customer Service Survey Results

Board overview | 2026

312 Total Respondents

Respondent Demographics
71% HCV Residents
13.49% Landlords
11.18% Other
4.28% Public Housing Residents

Overall Customer Satisfaction
55.45% Satisfied or Very Satisfied
31.09% Dissatisfied or Very Dissatisfied
13.46% Neither Satisfied nor Dissatisfied



Key Takeaway: While more than half of respondents reported positive experiences, nearly one-third expressed dissatisfaction, highlighting an opportunity to identify service gaps and improve the customer experience.

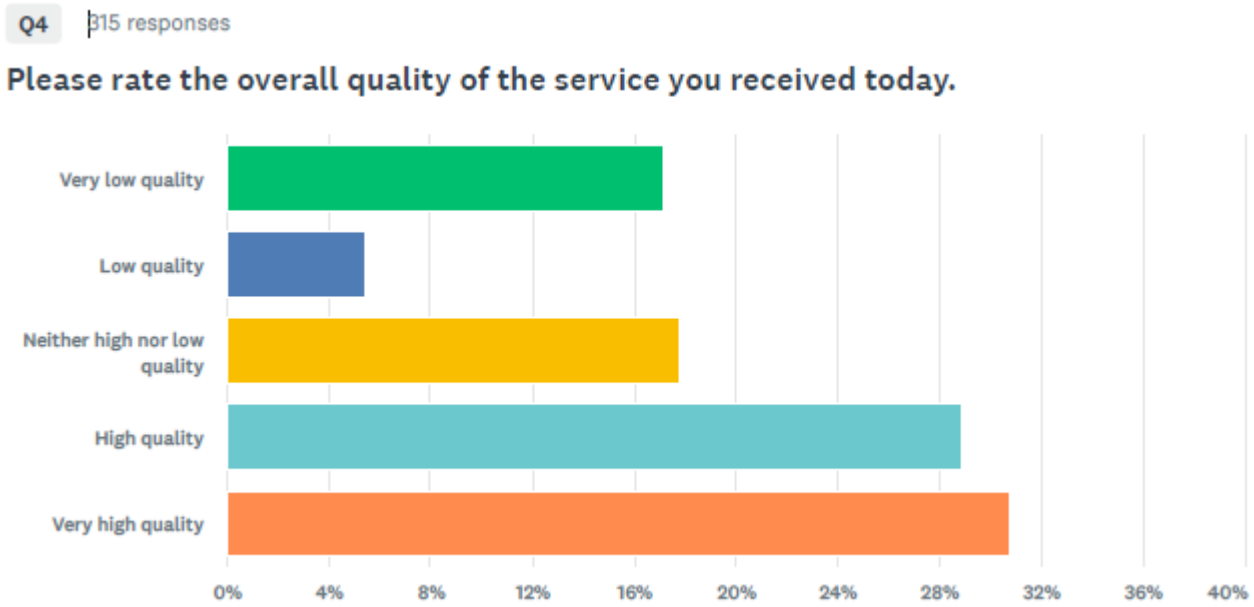
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