# 2024 City of Pasadena Housing Department Administrative Plan Proposed Changes

# **Chapter 1-Statement of Policies and Objectives**

Introduction: page 1-1

Explanation of need for updates as the result of the Final Rule implementing Sections 102 & 104 of the HOTMA Act of 2015. The CoPHD will implement these HOTMA changes beginning with reexaminations effective January 1, 2025.

G. Limited English Proficiency: Page 1-7

Updates this section to provide information about right to interpretation and to reference the Language Access Plan.

# **Chapter 2-Eligibility for Admission**

No changes.

## **Chapter 3-Applying for Admission**

No changes.

#### Chapter 4-Establishing and Maintaining the Waiting List

L. Expiration of Waiting List: Page 4-7 Rescinds the prior policy to expire the waiting list when it is over 5 years old or fewer than 200 applicants with Pasadena preference remain.

#### **Chapter 5-Subsidy Standards**

No changes.

# Chapter 6-Factors Related to Total Tenant Payment Determination

Introduction: page 6-1 References that the chapter was updated as the result of the Final Rule implementing Sections 102 & 104 of the HOTMA Act of 2015.

Income Exclusions: page 6-2 Specifies what is not included as annual income.

Determining Net Family Income from Assets: pages 6-8 to 6-9 Updates this plan to increase the threshold for imputed assets from \$5000 to \$50,000, and incorporates HOTMA established asset eligibility ceiling of \$100,000. Extends the asset ceiling threshold deadline for an additional 6 months for assisted households with a head of household who is over 65 or disabled, or includes a disabled dependent.

# Dependent Allowance: Pages 6-10

States that the Dependent Allowance will be adjusted annually based on CPI beginning in 2025. The adjustment factor will be provided by HUD.

Elderly or Disabled Family Allowance: Pages 6-10-6-11

States that the elderly or disabled family allowance will increase to \$525 beginning with reexaminations effective January 1, 2025 and will be adjusted annually based on CPI beginning in 2025. The adjustment factor will be provided by HUD.

# Childcare Allowance: Page 6-11

Provides hardship exemption to households who are no longer eligible for childcare allowance due to lack of employment or withdrawing from school. This exemption can be provided to households who demonstrate a need to continue to receive the allowance and that the loss of it causes an economic hardship. An extension of up to 90-days with one additional 90-day extension can be given.

# Disability Assistance Expense Allowance: Page 6-12

HOTMA increases the threshold for a disability expense deduction from amounts above 3% of gross income to amounts above 10% of gross income. This policy provides an extended rollout of this increased threshold for participants already receiving this deduction.

Participants:	2025 Effective Reexams	2026 Effective Reexams	2027 Effective Reexams
Already receiving a disability expense deduction of 3% of Gross Income	5% Of Gross Income	7.5% Of Gross Income	10% Of Gross Income
Claiming a disability expense deduction at 2024 Recertification	10% of Gross Income	10% of Gross Income	10% of Gross Income

Medical Expense Allowance: Pages 6-12-6-13

HOTMA increases the threshold for a medical expense deduction for people at least 62 or disabled from amounts above 3% of gross income to amounts above 10% of gross income. This policy provides an extended rollout of this increased threshold for participants already receiving this deduction.

Participants:	2025 Effective Reexams	2026 Effective Reexams	2027 Effective Reexams
Already receiving a medical expense deduction of 3% of Gross Income	5% Of Gross Income	7.5% Of Gross Income	10% Of Gross Income
Claiming a medical expense deduction at 2024 Recertification	10% of Gross Income	10% of Gross Income	10% of Gross Income

## Minimum Rent: Page 6-14

Rescinds the minimum rent policy. Prior to the COVID pandemic, the CoPHD had a \$50 minimum tenant rent policy. This policy was waived during the pandemic and is now proposed to be rescinded.

H. Definition of Temporarily/Permanently Absent: Pages 6-20-6-21 (and throughout Administrative Plan).

Increases timeframe to report changes in income and family composition from 15 to 30 days.

# **Chapter 7-Verification Procedures**

B. Release of Information: Pages 7-4-7-5

Implements the HOTMA rule change to require the Form HUD-9886 to be signed once at admission. Subsequently, the Form HUD-9886 is only required to be signed when a person 18 or older becomes a household member, when a family member turns 18, or when required by HUD instructions. Allows the assisted household to revoke the consent provided by the Form HUD-9886. However, assistance to the family would be terminated because annual income reexamination could not be conducted.

#### **Chapter 8-Issuance and Briefings**

No changes.

**Chapter 9-Request for Tenancy Approval and Contract Execution** No changes.

**Chapter 10-Housing Quality Standards and Inspections** No changes.

Chapter 11-Owner Rents, Rent Reasonableness, and Payment Standards No changes.

Chapter 12-Reexaminations

Introduction: Page 12-1

References that the chapter was updated as the result of the Final Rule implementing Sections 102 & 104 of the HOTMA Act of 2015.

B. Annual Reexamination: Pages 12-5

Update to clarify that 9886 must only be signed at annual re-exam if a family member has turned 18 or an adult 18 or over is being added.

C. Reporting Interim Changes: Page 12-8

Update to include that a review of EIV is no longer required by HUD for interim reexaminations.

Increases timeframe to report changes in income and family composition from 15 to 30 days.

Increases in Income: Page 12-9

Codifies threshold for interim reexaminations at increases of 10% or greater in adjusted income. Increases timeframe for families to report changes from 15 to 30 days, removes special requirements for reporting changes due to In-Home Supportive Services employment and public assistance reductions due to employment.

Decreases in Income: Page 12-9

Codifies threshold for interim reexaminations at decreases of 10% or greater in adjusted income.

Chapter 13-Moves with Continued Assistance/Portability

No changes.

Chapter 14-Contract Terminations No changes.

Chapter 15-Denial or Termination of Assistance No changes.

Chapter 16-Owner Disapproval and Restriction No changes.

Chapter 17-Property Owner or Family Debts to the CoPHD No changes.

Attachment B

#### **Chapter 18-Complaints and Appeals**

No changes.

# **Chapter 19-Project Based Vouchers**

Minor changes to reference HOTMA updates.

# Chapter 20-Supportive Housing Program

Extends the time period for an inspection to be valid as an initial inspection from 30 to 120 days.

# **Chapter 21-Consolidated Annual Contribution Contract**

No changes.

# **Chapter 22-Records Management**

No changes.

# Chapter 23-Program Integrity Addendum

No changes.

# Chapter 24-EIV Security Policies and Procedures

No changes.

# Chapter 25-Special Housing Choice Voucher Allocations

No changes.

# Chapter 26- Public Housing and Housing Choice Voucher Programs Temporary Compliance Assistance

Minor changes to reference HOTMA updates.