

Glenarden Housing Authority 2024 Updated Policies Admissions and Continued Occupancy Policy Comparison Guide

Quadel Training and Consulting, LLC is pleased to provide the Glenarden Housing Authority (GHA) with updated draft policies for the Low-Income Public Housing Program for consideration to be adopted by the GHA Board of Commissioners.

Over the course of several months, Quadel has met with the GHA management to review policies and discuss alternatives and potential impacts to changing current policies. Many of the recommended changes result from the required and discretionary policies of the Housing Opportunities with Modernization Act (HOTMA) and supporting Public and Indian Housing notices (PIH Notice). The PIH Notices update program rules with both mandated actions as well as setting forth discretionary policies that allow the housing agencies to create policies that are appropriate to their environment and population.

The following chart summarizes new policies, the rational and governing authority for the change.

Updated Admin Plan	Updated Policy	Rational for change
CHAPTER 1: PROGRAM AUTHORITY AND OBJECTIVES	Introduce policies that are now available through the Housing Through Modernization Act (HOTMA) and those that will become effective upon the effective date of implementation. This date is referred to as the GHA HOTMA Compliance Date . The GHA will post on its website when the GHA HOTMA Compliance Date has been established.	The Housing Through Modernization Act makes several regulatory changes to the HCV and Public Housing Programs.
CHAPTER 2: GENERAL ADMINISTRATIVE PROVISIONS AND POLICIES	No substantial changes made.	
CHAPTER 3: GENERAL FAIR HOUSING POLICIES	Adding protected groups to the non-discrimination policy: The GHA will not discriminate because of color, familial status, national origin, physical or mental disability , race, religion, sex, marital status, sexual orientation, gender identity, source of income, age, ancestry, citizenship, creed, or occupation .	Changes made to comply with HUD and State laws.
Fair Housing Complaint	Include addresses and information for how to file complaint under Fair Housing	Best practices for meeting requirement. This should also be posted to the Development Offices.

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<p>Family Outreach</p>	<p>Remove “To reach persons who cannot read the newspapers, GHA will distribute fact sheets to the broadcast media and utilize public service announcements.”.</p> <p>Add:” When the GHA’s waiting list is open, GHA will publicize the availability and nature of housing assistance through a newspaper of general circulation, minority media and the GHA website. Efforts will be made to notify local officials, government agencies, and agencies that specifically address the needs of individuals with disabilities. Notices will be provided in English. Efforts will be made to notify local officials, government agencies, and agencies that specifically address the needs of individuals with disabilities. “</p>	<p>Best practice collaboration with local units of government and assistance agencies to utilize external resources.</p>
<p>CHAPTER 4: APPLYING TO THE PROGRAM AND WAITING LIST</p>	<p>The GHA will notify applicants of the means to apply when the wait list is opened.</p> <p>If on-line applications are utilized and an applicant needs assistance completing or submitting the on-line application assistance may be provided via other means as identified by GHA.</p>	<p>Updating the policy to provide for current technology and to remove inconsistencies related to debt to other PHAs.</p>
<p>Unit Refusal</p>	<p>Applicants offered two opportunities to accept a unit if the first refusal is for “good cause”.</p>	<p>Clarifies that the applicant will have a second opportunity for unit offer before removal from the wait list.</p>
<p>Unit Acceptance</p>	<p>Extend the acceptance of a unit to two days rather than 24 hours.</p>	<p>Allow additional time for applicant acceptance.</p>
<p>Occupancy Standard / Unit Size</p>	<p>Occupancy Standards: Foster children must be included in the determination of unit size (HOTMA), remove time period in the household. Remove age and gender requirements from the subsidy determination.</p>	<p>Simplification and consistency of application for families of the same size. Remove requirement for monitoring age of household members, gender (identity) of</p>

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		household members. Reduce the need to change units based on age/gender.
CHAPTER 5: INITIAL AND CONTINUING ELIGIBILITY	Added restriction on eligibility due to Net Family Assets. A family cannot receive benefits if the (i) Exceed the net asset threshold established by HUD annually; (ii) they have present ownership interest in, a legal right to reside in, and the effective legal authority to sell, based on the State of Maryland laws, real property that is suitable for occupancy by the family as a residence.	HOTMA requirement
Definition of Family	Update definition of "family".	HOTMA requirement
Self-certification of SSN	The GHA may accept the self-certification of social security number if the family member presents additional third-party documentation such as a bank account or other documentation supporting the identity of the individual. This self-certification must disclose the social security number and will be verified through HUD EIV systems.	HOTMA discretionary policy.
Definition of Income	GHA will use HUD's current definition of income and income exclusions. The definition of Assets, Net Family Assets, Necessary and Non-necessary personal assets are set forth by HOTMA.	HOTMA has changed the definition of income; exclusions; assets and asset exclusions. These will not be implemented until GHA HOTMA Compliance Date as they require the use of the new HUD form 50058 and HUD's Housing Information Portal.
Deductions from Income	HOTMA has established annual adjustment for deductions that will be implemented upon the GHA HOTMA Compliance Date. These also include	Required by HOTMA

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	new threshold for medical expense that is increasing from 3% to 10% (See Hardships)	
Restriction on Over Income Public Housing Families	When the GHA becomes aware, through an annual reexamination or an interim reexamination for an increase in income, that a family's income exceeds the applicable income limit, the GHA will document that the family exceeds the threshold and will begin to monitor the family income over a 24-month grace period. The over income limit is set by multiplying the very low-income level for the applicable area by a factor of 2.4 (a limit equal to approximately 120% of the area median income). After the 24-month grace period, families remaining over the established income limit will receive notification of termination from the GHA housing program.	HOTMA Section 103 was implemented in 2024 prior to Sections 102 and 104
CHAPTER 6: VERIFICATIONS	The GHA will accept a self-certification from a family as verification of net family assets less than the HUD established annual threshold, assets disposed of for less than fair market value and will accept self-certification of ownership in real property. The GHA will also accept a self-certification of social security number when the family presents documentation issued by a federal agency including the member's name.	HOTMA discretionary policy.
Prior Year Wage Income	The use of Prior Year Income will be effective upon the GHA HOTMA Compliance date. The EIV Income Report may be used to verify and calculate income if the family self-certifies that the amount is accurate and representative of current income. The family must be provided with the information from EIV.	

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Smoke-Free Policy	GHA prohibits the use of prohibited tobacco products in all public housing living units, indoor common areas in public housing including, but not limited to bathrooms, lobbies, hallways, stairways, elevators, management offices, community rooms and balconies, and in GHA administrative offices. The smoke-free policy extends to all outdoor areas up to 25 feet from the public housing and administrative office buildings.	HUD requirement 24 CFR § 965.653(c)
CHAPTER 8: RENT CALCULATION	Effective upon GHA HOTMA Compliance Date the GHA will use prior year income for determination of annual income at annual re-examination. Anticipated Income (currently used) will be used for new admission and interim re-examinations	HOTMA required policy
Hardships	<p>Health and Medical Care Expense Hardship for families with an increase from 3% medical expense to 10%. Effective upon GHA HOTMA Compliance Date.</p> <p>General financial hardship: Effective upon the GHA HOTMA Compliance date, to receive general relief, an elderly or disabled family or a family that includes a person with disabilities must demonstrate that the family's unreimbursed health and medical care expenses or unreimbursed reasonable attendant care and auxiliary apparatus expenses increased, or the family's financial hardship is a result of a change in circumstances that would not otherwise trigger an interim reexamination.</p>	HOTMA Requirement

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	Effective upon the GHA HOTMA Compliance Date, a family whose eligibility for the childcare expense deduction is ending may request a financial hardship to continue the childcare expense deduction.	
Chapter 10: ONGOING PROGRAM OPERATIONS	Annual Re-exam: The GHA will provide the resident no more than two requests for documentation (the initial request and one follow up request). If the family fails to provide verification of student status, medical expenses, or childcare expenses the GHA will not include these deductions in the determination of adjusted annual income.	The objective of this policy is to obtain family compliance and reduce late re-examination certifications.
Streamlined Income Determination	For any family member with a fixed source of income, the GHA may determine that family member's income using a streamlined income determination by applying, for each fixed-income source, the verified cost of living adjustment (COLA) or current rate of interest to the previously verified or adjusted income amount.	Discretionary policy to reduce administrative burdens
Safe Harbor Income Determination	The GHA may determine a family's annual income (for the purposes of determining income eligibility and annual re-examinations), including income from assets, prior to the application of any deductions based on income determinations made within the previous 12-month period, using income determinations from the means-tested federal public assistance programs.	This is a HOTMA discretionary policy available prior to GHA HOTMA Compliance Date. Purpose is to streamline income determinations
Family Notification to GHA	All changes of income and family composition must now be done within 15 calendar days.	Provide consistency in reporting and sufficient time for tenant response.
Date Interim Is Effective	Effective upon the GHA HOTMA Compliance Date, if the tenant has complied with the interim reporting	HOTMA Requirement

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	<p>requirement and the tenant’s rent is anticipated to decrease, rent decreases will be effective on the first day 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. Prior to the GHA HOTMA Compliance Date, the effective date of the tenant’s decreased portion will be on the first day of the month following the completed request for interim.</p>	
Increase of Income	<p>Effective upon the GHA HOTMA Compliance Date, the GHA will perform an interim to increase the tenant rent for an increase of unearned income greater than 10% of the family household income reported at the last annual recertification.</p> <ul style="list-style-type: none"> GHA will create an interim for earned income if greater than 10% and follows an interim for reduced income during the same certification period. 	HOTMA Policy
Decrease of Income	<p>Effective upon the GHA HOTMA Compliance Date. Decreases in income that are greater than 10% or more of the family’s annual adjusted income will receive an interim recertification.</p>	HOTMA Policy
Repayment Agreements	<p>If the family chooses to enter into a repayment agreement, the GHA will require a minimum down payment of 20% of the amount owed. The term of repayment agreement will not exceed twenty-four (24) months. In no event will the GHA enter into a repayment agreement for retroactive rents whereby the monthly amount of the repayment plus TTP is greater than 40% of the family’s adjusted monthly income.</p>	HUD Requirement (PIH Notice 2018-18)

<p>CHAPTER 12: PROGRAM INTEGRITY</p>	<p>De Minimis Errors. Effective upon the GHA HOTMA Compliance Date, de minimis errors occur when the GHA determination of a family's income deviates from the correct income determination by no more than \$30 per month in monthly adjusted income (or \$360 in annual adjusted income).</p> <p>Depending upon the family circumstances and when errors are detected, the GHA may take one of the following corrective actions to credit or repay the family.</p> <ul style="list-style-type: none"> • Repay the family the tenant portion overpayment • This may be performed if the family no longer resides in the same unit • Apply the family a credit to reduce the amount of tenant rent until the amount of family overpayment has been met. • This may be performed if the family continues to reside in the same unit as when the overpayment was made. 	<p>HOTMA Requirement</p>