

The Summary of Proposed Revisions to The Corpus Christi Housing Authority (CCHA) Housing Choice Voucher Program (HCV) Administrative Plan

The Corpus Christi Housing Authority (CCHA) is announcing a public comment period for the proposed changes to the Housing Choice Voucher (HCV) Administrative Plan.

CCHA will receive written comments regarding the proposed HCV plan during the 45-day public comment period that will commence on Friday June 6, 2025, and conclude on Monday July 21, 2025. A Public Hearing to receive additional comments is scheduled for July 21, 2025.

The proposed revised CCHA HCV Administrative Plan tracks proposed changes as follows:

Regulatory, Housing Opportunity Through Modernization Act (HOTMA) or local policy changes effective upon Board Approval of the Plan – green highlighted

Local preference changes that are effective upon Board Approval of the Plan – blue highlighted

Housing Quality Standards (HQS) to National Standards for the Physical Inspection of Real Estate (NSPIRE) requirements effective October 1, 2025, or any alternative date per HUD announcement – yellow highlighted

Future HOTMA policy changes, with HOTMA implementation date to be announced later when HUD's Housing Information System (HIP) system is ready and required software changes are completed – gray highlighted

Background information regarding the Housing Opportunity Through Modernization Act

(HOTMA). HUD published a final rule on February 14, 2023, revising regulations related to income, assets, adjusted income, verification, and reexams (among others) to implement Sections 102 and 104 of HOTMA. While the new regulations were effective January 1, 2024, HUD has delayed the full compliance date for HOTMA 102/104. Currently, PHAs remain unable to fully comply with HOTMA 102/104 because compliance depends on transitioning from HUD's IMS/PIC system (which is unable to accept HOTMA-compliant Form HUD-50058) to HUD's new Housing Information Portal (HIP) system

On December 18, 2024, HUD published Notice PIH 2024-38, which identifies some provisions in HOTMA 102/104 that PHAs must comply with and indicates other HOTMA 102/104 provisions not listed in the notice are dependent on HIP implementation and may not be implemented yet. ***The proposed revised HCV Administrative Plan includes required HOTMA changes highlighted in green and future HOTMA changes highlighted in gray and included in chapters 6.b, 7.b., and 11.b.***

CCHA will notify program participants of the effective date at which the future HOTMA policies identified in the HCV Administrative Plan will be implemented, upon HUD notice that the HOTMA transition can take place when HIP is operational.

NSPIRE inspection requirements are scheduled for October 1, 2025, unless HUD delays this date.

Throughout the Housing Choice Voucher (HCV) Plan- Housing Quality Standards (HQS) will be referenced but after the implementation of NSPIRE, HQS also references the new NSPIRE protocols.

Chapter	Page	Text
Introduction		Added information on the Housing Opportunity Through Modernization Act (HOTMA)
1.1 Overview		No changes to this chapter
2.I.C Discrimination Complaints	2-4	Expanded the existing policies on Violence Against Women's Act (VAWA) including guidance from Notice FHEO 2023-1
3-1.B Family Household	3	Added policy based on Notice PIH 2017-08 regarding Veterans Affairs Supportive Housing (VASH) voucher and if a veteran is the perpetrator of domestic violence the victim is eligible to receive a regular HCV voucher.
3.I.K Definition of Family and Foster Children and Foster Adults	7	Revised the definition of family based on HOTMA requirements and definition of foster children and foster adults & homeless and at-risk youth
3.II.D. Family Consent to Release Info	13	Updated Consent to Release of Information policy to include the families right to revoke consent to collect information relevant to the family's income and added CCHA's policy deny admission or terminate assistance if the family revokes consent.
3.III. C. Restrictions on Assistance Based on Assets	22	Per HOTMA, added asset Limitation for New Admissions – CCHA's must deny admission of an applicant for the following: Net family assets exceeding \$100,000 (adjusted annually for inflation) The family has a present ownership interest in, legal right to reside in, and the effective legal authority to sell real property that is suitable for occupancy by the family as a residence.

4 – Application, Waiting List & Selection	Pages	Updates to the local preferences.
Elderly Preference	9	Changing from a 5 point to a 10-point preference
Partnering Agency & Homeless Transition Preference	9-10	Clarifying the difference between these preferences and assigning point values.

5– Briefings & Issuance		No changes to this chapter
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Chapter 6 A– Income & Subsidy Determinations	Pages	These changes will become effective upon Board approval in July 2025
6.I.D Calculating Earned Income	7-8	HOTMA defines types of income that is included or excluded as Annual Income
6.I.F Business Income	9	Defines independent contractor
6.I.G Student Financial Assistance	11-16	Gives CCHA instructions on when student income is included or excluded

6.I.H Periodic Payments	17-18	Defines Periodic payments and determines if they are included in income calculations including Lump-sum Payments, Retirement Accounts, Social Security Benefits, Alimony & Child Support
6.I.I Non-recurring Income	18-19	Defines that income received as an independent contractor, day laborer or seasonal worker is included as income.
6.I.L Additional Exclusions	22-26	All other exclusions from annual income are defined including payments for the care of foster children and adults, insurance payments, military personnel in hostile fire, loan proceeds, and training programs.
6.I.M Assets	28	Defines which lump-sum payments are included or excluded under HOTMA
	33-34	Explains how CCHA should treat different types of trusts under HOTMA
6.II.D Health & Medical Expense Deductions	38-39	HOTMA redefines what qualifies as a deduction
6.III.C Applying Payment Standards	49-51	HOTMA instructs on when CCHA can increase or decrease the payment standard
6.III.D Applying Utility Allowances	52-53	Clarifies when CCHA can increase a family's utility allowance due to Reasonable Accommodations.
Chapter 6 B– Income & Subsidy Determinations		The updates in this chapter will happen when HOTMA is fully enacted.
6.I.C Calculating Annual Income	6-7	Changes to Calculating Annual Income at reexamination using previous 12-month income
6.I.C Calculating Annual Income	7-8	Changes to definitions on earned income including wages, day laborer, seasonal worker,
6.I.D Earned Income	9-10	Removal of certain income acquired under state and local employment training programs
6.I.E Earned Income Disallowance	10	Changes to calculation of disallowance
6.I.G Student Financial Assistance	13-19	Changes to calculating Student Financial Assistance; requires CCHA to determine the student relationship to the household and whether any excess student aid should be included in the family's income
6.I.J Welfare Assistance	23	Clarifying when welfare assistance is counted as annual income
6.II.B Assets Disposed of for Less Than Fair Market Value	32-33	Clarifies when CCHA will be included during a divorce, and foreclosure or bankruptcy, and requires a family to sign declaration about the value of the asset
6.II.C Asset Inclusion and Exclusion	34-42	Defines Necessary and Non-Necessary Person Property; Sets the Necessary Personal Property threshold at \$50,000 for 2024 and \$51,600 for 2025
6.II.D Determining Income from Assets	43-44	Clarifies when assets are included and excluded from annual income; defines Net Family Assets; explains
6.III.A-D Adjusted Income	44-47	Updates Elderly Adjustment from \$400 to \$525 after HOTMA is activated; Links Dependent Deduction to Consumer Price Index, and redefines Health & Medical Care Expenses
6.III.F Child Care Expenses	51	Defines when a family can deduct Childcare
6.III.G Hardship Exemption	52-57	Defines a hardship and when a family qualifies for this exemption; Includes rent and childcare hardship exemptions
Exhibit 6-1	69-76	A list of changed definitions
Exhibit 6-2	77-78	Definitions for Family Assets

Exhibit 6-3	79-81	How welfare benefit reduction affects family income
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7.A. Verification		These changes will become effective upon Board approval in July 2025
7.I.A Consent Forms	1-2	Requires CCHA to use the HUD-9886-A form for all applicants and family members over 18
7.I.B. & C. Use of other Programs' Income Determinations	3-5	Safe Harbor verification method and Streamlined Income determinations explained. CCHA will not use these verification methods.
7.II.B Social Security Numbers (SSN)	12	Allows applicants to self-certify with third-party verification of a SSN
7.III.C Periodic Payments	22	Gives applicants a remedy if they disagree with what is reported on EIV
7.III.J Student Financial Assistance	26	New requirements for verification of student income
7.B. Verification		The updates in this chapter will happen when HOTMA is fully enacted.
7.I.D Verification Hierarchy Requirements and Upfront Verf.	12-22	Updated Verification Hierarchy Requirements based on recent HUD notices.
7.III.H. Tax Refunds	45	CCHA are not required to verify the amount of a family's tax refund if the family's net assets are less than the HUD threshold.
7.III.K Zero Annual Income Status	48	Revised Zero income policy as allowed per HOTMA to accept self-certification of zero income and require families to submit a zero-income form

Chapter 8 – Housing Quality Standards	1	Updated the Chapter with new National Standards for the Physical Inspection of Real Estate (NSPIRE) requirements.
8.I.A General Standards	3	Defines new regulations on carbon monoxide alarms and lead-based paint hazard
8.I.D Owner & Family Responsibilities	7-9	Defines when and why owners and tenants are responsible for inspection deficiencies; Defines when CCHA will waive a responsibility
8.II.F Inspection Results and Re-inspections for Units Under HAP Contract	17	Defines when and how the family and the landlord of inspection failures.

9 - Leasing		No changes to this chapter
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10– Moving	Pages	Updated the Chapter with NSPIRE requirements
10.I.B Family Moves due to Unit Deficiencies	2-3	Defines when the CCHA will issue a new voucher to a family when a unit fails inspection due to owner deficiencies

11.A.– Reexaminations	Pages	These changes will become effective upon Board approval in July 2025
11.II.B Interim Changes	7-8	Changes to family unit size will be used to determine the payment standard at the reexamination
11.II.C. Changes Affecting Income or Expenses	9	Requires a family to report income /expense changes in 10 days; no action is required by CCHA
11.III.B Changes in Payment Standard and Utility Allowances	11	Defines when CCHA can change the payment standards

11.B. Re-examinations		The updates in this chapter will happen when HOTMA is fully enacted.
11.I.E Calculating Annual Income at Reexaminations	4-6	Notice PIH 2023-27 lists steps to follow the calculation of both earned and unearned income.
11.II.D Processing Interim Re-examination	11-14	Requires CCHA to estimate the family income based on the last 12 months of income
11.II.E Effective Dates	14-15	Defines with a family must report changes in status and remedies for not reporting
11.IV. Non-Interim Reexamination transactions	20	New part of this chapter; lists non-interim transactions and how to implement them.
Exhibit 11-1 Calculating Income		Examples of the new rules

12– Terminations	Pages	
12.I.D	2	Failure to provide a signed consent form for all family members over the age of 18, or revoking consent, will result in termination.
12.I.E Mandatory Policies & Other Authorized Terminations	7-8	Defines how CCHA would terminate vouchers due to funding cuts.
12.II.E VAWA	12	Includes the term “human trafficking” with VAWA language to better align with current guidelines published in the Federal Reserve on January 4, 2023.

13 Owners		No changes to this chapter
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14– Program Integrity	Pages	
14.II.D De Minimis Errors	7	Added a new policy of De Minimis Errors to provide clarification due to HOTMA changes

15 Special Housing Types	Pages	Includes policies if CCHA decides to use a special housing type as needed for reasonable accommodation.
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16 Program Administration	Pages	No changes to this chapter
16.II.B Payment Standards	3-6	HOTMA offered definitions for Small Area FMR, basic range payment standards, and established exceptions but CCHA has not established any designated payment standard areas.
16.IV.A Orner of Family Debts to CCHA	26-27	Give CCHA the option to set up payment agreements with either the family or an owner for unpaid rents. Outline remedies if these debts are not paid
16.VI.B Record Retention	35	Establishes a 3-year requirement for keeping Form 50058 and supporting documentation, and Enterprise Income Verification (EIV) income reports,
16.IX. VAWA Notification, Documentation & Confidentiality	39-42	Includes the term “human trafficking” with the VAWA language to better align with the current guidelines; Defines domestic violence, economic abuse and technological abuse to better align with current guidelines.

Chapter 17: Project- Based Vouchers	Pages	Not HOTMA or NSPIRE related, but updates to our Admin Plan to keep us in compliance.
17.I.C Maximum Number of PBV Units	5-7	Allow CCHA to commit 20% of its authorized voucher units to Project Based Vouchers (PBV); Analysis of impact required for more units.
PBV Units that no longer qualify	9	Outlines how to handle units that no longer qualify

Proposal & Project Selection	13-20	Describes the circumstances under which CCHA will use noncompetitive selection for PBV projects; and outlines the proposal process
Dwelling units	27-31	Identifies the special housing quality standards that apply to the PBV program including inspection protocol
Rehabilitated & New Construction	32-37	Clarifies the specific requirement for PBV newly constructed housing including contracts, broadband and labor standards.
Housing Assistance Payment (HAP)	37-42	Allows CCHA and owner to place multiple projects under one Housing Assistance Payment (HAP) contract; Describes how a PHA should terminate a HAP due to insufficient funding
Family Obligation	43-48	Outlines the family's responsibilities for care of the unit and remedy's for violations.
Waitlist Organization	52-55	States CCHA may use separate waitlist for each building or project and allow owners to maintain their own waiting list; CCHA does not have separate waitlists PBV buildings or properties.
Family Right to Move	63-65	In compliance with VAWA guidelines, clarifies a family's right to move and outlines protocols
Operating Cost Adjustment Factor (OCAF)	69-74	Establishes how PBV owners can request a rent increase

18 Project Based Vouchers (PBV) Under the Rental Assistance Demonstration (RAD) Program	Pages	Not HOTMA or NSPIRE related, but updates to our Admin Plan to keep us in compliance.
PBV Percentage Limitation	13	Clarifies that RAD units do not count against the max amount of assistance CCHA may utilize for the PBV program
Interim inspections	16	Clarifies under what conditions interim inspections must be done
Enforcement of Housing Quality Standards	19-24	Requires CCHA to hold PBV owners to the same inspection standards as other landlords and defines responsibilities with respect to tenant and landlord; Also defines remedy for CCHA if landlords do not comply.
Family Briefing	31	Additional requirements for CCHA to inform new families of during orientation
Continuation of HAP	36-37	This pertains to residents in units when the unit converts to RAD, but it updates our plan in case we need it for the future
Moves	40-43	At conversion, this allows CCHA to move families that are over or under housed to the right sized units
Emergency Transfers	44	Requires RAD properties to allow transfers under VAWA
Vacancy Payments	50-51	Describes under what circumstances CCHA will make vacancy payments to the RAD property

19.IV. Specialty Voucher Programs	Pages	Not HOTMA or NSPIRE related, but updates to our Admin Plan to keep us in compliance.
Foster Youth Initiative (FYI)	8-13	Allows CCHA to extend services to these voucher holders an extra 24 months
Veterans Affairs Supportive Housing (VASH)	14-28	Clarification on how to determine applicants' annual income; establishes a minimum rent; sets payment standards & allows special housing types

Mainstream Vouchers	29-32	Allows for a separate waiting list, but CCHA uses our local preference identify applicants; Defines circumstances when extension can be granted
Glossary of Terms		Updated Glossary of Terms with new HOTMA requirements,