

**AAHC FISCAL YEAR 2024 DRAFT ANNUAL PLAN**

Annual Plan Attachment

**Section B.1 Annual Plan Element Proposed Changes FY24**

**Statement of Housing Needs and Strategy for Addressing Housing Needs.**

- A. **Housing Choice Voucher Waiting List.** The AAHC currently has the following preferences: persons with a disability, resident or works in Washtenaw or Monroe County, seniors and homeless. AAHC opened the HCV Waiting List for one month, on August 3, 2020; we received over 3,300 applications. At that time, about 50% of the AAHC’s voucher tenants reported as non-elderly disabled households. Below are the demographics as reported by the applicants:

**HCV Waiting List**

White	742
Black	2269
Asian	28
American Indian	20
Pacific Islander	2
Multiple Race	219
No Identification	0
Hispanic	144
Non-Hispanic	3199
Female	2612
Male	731
Average Annual Income	\$11,427
Average Household Size	2
Near Elderly (Age 55-60)	499
Elderly (Age 62 and older)	225
Disabled	2268
Homeless	1332

- B. **Project Based Voucher Waiting List:** The AAHC currently has the following preferences: persons with a disability, resident or works in Washtenaw or Monroe County, seniors and homeless. AAHC opened the RAD PBV Waiting List for one month, on August 3, 2020. AAHC advertised the opening for one (1) through five (5) bedroom units; and received over 2,200 applications. At that time about 43% of the applicants self-reported as homeless and 35% reported annual income of less than \$10,000. Below are the demographics as reported by the applicants:

**PBV Waiting List**

White	566
Black	1463
Asian	19
American Indian	12
Pacific Islander	2
Multiple Race	153
No Identification	0
Hispanic	91

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Non-Hispanic	2175
Female	1715
Male	551
Average Household Size	2 Persons
Near Elderly (Age 55-61)	342
Elderly (Age 62 and older)	181
Disabled	1496
Homeless	979
Reported Income between \$1 – \$9,999	35%
Reported Income between \$10,000 – \$19,999	26%

**During FY23, the following administrative policies were adopted by the AAHC Board**

**Admission and Continued Occupancy Plan**

**13 -OVER-INCOME FAMILIES**

For Public Housing residents, AAHC will terminate the tenancies of families who exceed the over-income (OI) limit for at least two consecutive years (24 consecutive months). The family will be considered public housing families and must be offered the option of paying an income-based rent or a flat rent at their next annual reexamination.

**Administrative Plan Policies**

**6: INCOME AND SUBSIDY DETERMINATIONS**

AAHC will exclude the Guaranteed Income to Grow Ann Arbor (GIG A2) monthly stipend from calculation of annual income. GIG A2 is a two-year guaranteed income pilot program that provides monthly payments of \$528 to 100 entrepreneurs with low and very low incomes in Ann Arbor. Guaranteed Income is applicable to Ann Arbor entrepreneur, small business owner, gig worker, or someone with a side hustle. Guaranteed Income to Grow Ann Arbor would provide \$528 a month for 24 months to support well-being, economic stability, or business.

**15: SPECIAL HOUSING TYPES: SECTION VII: HOMEOWNERSHIP**

Participants of the homeownership program, receive homeownership assistance payments in lieu of assistance with monthly unit rent. In administration of the homeownership voucher type AAHC must adopt policies for determining the amount of homeownership expenses to be allowed in accordance with HUD requirements. Staff recommend the board approval the AAHC to amend the policy to include a monthly allowance of \$300 for major repairs and replacements.

**16 - VOLUNTARY USE OF SMALL AREA FMRS**

AAHC will voluntarily adopt the use of SAFMRs. We will utilize the SAFMRs for both the tenant-based voucher program and the project-based voucher program for the following zip codes: 48103, 48104, 48105, and 48109, no later than July 1, 2024.

**17 – PROJECT BASED VOUCHER**

If a PHA plans to exceed the cap on the number of units in a project that may have PBV attached for non-elderly families (i.e., the greater of 25 dwelling units or 25 percent of the dwelling units in any

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project), the Administrative Plan must describe the types of services offered to families for a project to qualify for the exception and to the extent to which such services will be provided. The current Administrative Plan now list the types of services that may be offered to qualify.

In accordance with PIH Notice 2017-21 states that: “The PBV statute defines project as a single building, multiple contiguous buildings, or multiple buildings on contiguous parcels of land. This definition was unchanged by HOTMA. PHAs have discretion to define a project within the parameters of the statutory definition. AAHC defines a project as a single building, or as multiple contiguous buildings, or as multiple buildings on contiguous parcels of land.”

Related to the definition of a suitable location to include areas that have a high-student population. One of HUD’s definition of a suitable area is one with a poverty level of less than 20%, with some exceptions as described below. Ann Arbor, like other communities with a large population of students in higher education, appear to have high poverty census tracts that are not actually high-poverty. All of areas with high poverty census tracts in Ann Arbor are census tracts with high student populations, who self-report their income and are considered temporarily in poverty, and who live in high-cost housing. AAHC revised its definition of suitable location as a project located in a census tract where more than 50% of residents are post-secondary students (college students).

### **TEMPORARY POLICY SUPPLEMENT: EMERGENCY HOUSING VOUCHER (EHV)**

AAHC has amended the Administrative Plan to include the new service fee activities to allow payment for rental arrears, storage expenses, or lock change fees. As well as, eligible uses for housing mobility services to encourage move to high opportunity neighborhoods, incentives to owners with accessible units who lease to disabled households, support to families to fulfill their obligations under EHV, and household items such as furniture, toiletries, and cleaning supplies.

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**Financial Resources:**

<b>2024 Planned Financial Sources and Uses</b>		
<b>Federal Sources:</b>	<b>Planned (Est.)</b>	<b>Planned Uses</b>
Moving to Work Housing Choice Voucher Housing Assistance Payments (HAP) & Admin Fees		HCV and PBV HAP & Admin Expenses
EHP/VASH/FUP Housing Choice Voucher Housing Assistance Payments (HAP)		EHV/FUP/VASH HAP
EHP/VASH/FUP Admin Fees		EHV/FUP/VASH Admin Expenses
Mainstream Voucher Program Housing Assistance Payments (HAP)		HAP Expenses
Mainstream Voucher Admin Fees		Administrative Expenses
Family Self Sufficiency		Family Self Sufficiency program
Other (Fraud Recovery)		Voucher Programs and Central Office
Capital Funds & Operating Funds for Turnkey III		Garden Circle (MI064000100)
<b>Non-federal sources (list below)</b>		
City of Ann Arbor General Fund		Voucher Administration, Central Office,
Affordable Housing Millage		Affordable Housing Development, Tenant Services, and Administrative Expenses
Mental Health Millage Rebate		Tenant Services and Administrative Expenses
Ann Arbor Downtown Development Authority		Development of City-Owned Properties in DDA District
Other Revenue		Property Management Fees
<b>Total resources</b>		

**Section B.2 and C.1 New Activities**

**Moving to Work:** AAHC was designated as a Moving-To-Work (MTW) agency in January 2022. MTW is a demonstration program for Public Housing Authorities (PHAs) to design strategies to help residents find or increase employment, become financially self-sufficient and increase housing opportunities for low-income households. The MTW program allows the AAHC more flexibility with how voucher program funds are administered. AAHC was selected in MTW Cohort #4 Landlord Incentives. AAHC will use the exemption allowed under MTW to establish strategies to increase and continue landlord participation on the HCV program and increase the successful lease-up and long-term housing stability of voucher participants. The MTW program objectives are to reduce costs, give households incentives to achieve economic self-sufficiency, and to increase housing choice. The intent is to serve the same number of low-income families as without MTW funding flexibility. The AAHC will continue to serve a mixture of family sizes. The AAHC will ensure that 75% of the families assisted will have incomes at or below 50% of area median income. All assisted units will continue to meet housing quality standards (HQS). Finally, the AAHC will establish a reasonable rent policy that will encourage self-sufficiency for participating families.

**Garden Circle Turnkey III:** The AAHC owns a single-family home on Garden Circle, Ann Arbor MI, that was acquired through HUD's Turnkey III lease to ownership program. The Turnkey III program no longer exists and the families that have lived in this home have not been able to purchase the property. The AAHC will dispose of the property through the Streamlined RAD Conversion for Small PHA's process. The property will be retained by the AAHC by ground leasing the property for \$1 to a wholly owned subsidiary of the AAHC, Colonial Oaks, LLC. Colonial Oaks currently includes 50 former public housing units that were converted to project-based vouchers under the RAD program.

The existing tenant may continue to live at the property with a project-based or tenant protection voucher or move with a tenant-based voucher. Staff held the first mandatory resident meeting on March 10, 2023.

If there are any proceeds from the disposition of the property, after deducting the reasonable and necessary costs of disposition, the proceeds will be spent on renovations of existing low-income properties under a PBV HAP contract in the Colonial Oaks portfolio, including: 2072 Garden Circle, 1504 – 1506 Broadway, 3681 – 3689 Platt, 2670 - 2680 S. Main, 1020 - 1042 Pennsylvania, 221 – 253 S. Seventh, 3565 – 3585 Oakwood, and 805 – 807 W. Washington. .

**Faircloth to RAD:** the AAHC has 3 additional units under the Faircloth regulations that can be developed under the RAD conversion process. The AAHC is exploring the process and best locations to develop 3 additional subsidized housing units at properties it currently owns or is currently developing.

The Ann Arbor City Council passes a resolution to support an analysis of city-owned properties to determine if they are financially feasible to develop as affordable housing. The analysis was completed by the AAHC, and 10 properties were identified as good locations for affordable housing development. Each site is unique and will have a separate plan for its development. Properties were analyzed based on zoning, regulatory restrictions, environmental conditions, and eligibility for HUD and LIHTC funding. The AAHC spent 2 years on community engagement to

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understand the priorities of the community and to start discussing site concepts. Four properties are in the zoning and site plan development stage, two properties are in the pre-development due diligence phase, and four properties are in the queue until staff have the capacity to complete pre-development due diligence.

The City of Ann Arbor passed an affordable housing millage for 1 mil for 20 years, which will raise about \$6.5 million annually. It is anticipated that the millage will support the development (new construction, acquisition, and renovation) of approximately 1500 new affordable housing units for households up to 60% of the Area Median Income (AMI). The millage also allows for up to 20% of the funds to be used for tenant supportive services. The millage is a key component of the development strategy for the 10 city-owned properties to provide gap financing and tenants service funding.

### **Section B.6 Progress Report**

*Please see the 4 goals from FY20 – FY24 Plan with a progress report for each goal*

- 1) Complete Redevelopment of all public housing units to Project Based Vouchers through the Rental Assistance Demonstration (RAD) project

The AAHC was approved by HUD to redevelop all its public housing to project-based vouchers under the RAD program. Phases 1, 2, 3, 4, & 5 are completed. The single-family Turnkey III home on Garden Circle is the only property that has not converted yet.

- 2) Develop new affordable housing:
  - a. At existing public housing sites
  - b. New properties

a. Through the RAD conversion program, AAHC demolished and built new housing at 3 former public housing properties. A total of 58 new apartments were added through the RAD conversion process. Phase 1, Miller Manor, was redeveloped with three (3) additional apartments. Phase 3 at N. Maple added 23 apartments. Phase 4 at Lower Platt (now known as Creekside Court) added 28 apartments and White/State/Henry (now known as State Crossing) added 4 apartments.

AAHC has begun renovating Garden Circle, the only property not converted under the Rental Assistance Demonstration. Renovations will include rehabilitation of the kitchen and bathroom, addition of a second bathroom, and extensive repair to the basement of the three-bedroom single-family dwelling.

b. AAHC acquired Siller Terrace, a 14-unit two and three-bedroom garden style apartment located in Ann Arbor. The property although, not restricted to a special population such as veterans, seniors, or homeless households; units are restriction to household at 60% AMI or less. Any existing over-income tenants will be grand fathered in, but all new tenants must meet the income-restrictions.

The AAHC has acquired Lurie Terrace, a 136-unit senior apartment in Ann Arbor. The AAHC will be income restricted as well as restricted to households who are 62 years or older. Forty

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percent of the units will be restricted to households at 60% AMI or less and 60% will be restricted to households at 80% AMI or less. Any existing over-income tenants will be grandfathered in, but all new tenants must meet the income-restrictions.

The following city-owned properties are in the development stage:

- 121 E. Catherine: proposed 66-unit project with 50% of the units reserved for supportive housing and 50% reserved for low-income households in the creative sector. All units would be affordable to households up to 60% AMI.
- 350 S. 5<sup>th</sup>: Approved zoning and supplemental regulations that require a minimum of 40% (approximately 145) affordable units affordable for households up to 60% AMI in a 2-tower building.
- 415 W. Washington: proposed residential building with about 125 units, 15% of which would be affordable to households up to 60% AMI or a cash contribution to the Affordable Housing fund in lieu of including units on site.
- 2000 S. Industrial: proposed mixed-use site including residential and City uses such as offices, storage, and fleet services
- 1510 E. Stadium: conducting due diligence
- 721 N Main: conducting due diligence

### 3) Project-Based Voucher:

Increase the number of Project-Based Vouchers in the City of Ann Arbor and other communities in Washtenaw County that have a strong economic base and public transportation. AAHC projects that we will convert about 200 vouchers to project-based vouchers by FY25.

In addition, 23 VASH vouchers for chronically homeless veterans were project-based through a partnership with the VA.

- a. Addition of PBV Units: The AAHC issued Project-Based Voucher RFP on September 9, 2020, for up to 150 vouchers in the City of Ann Arbor. The AAHC received applications for 162 project-based vouchers. The AAHC has entered into agreement for 79 vouchers within Ann Arbor for the following projects: 33 vouchers at 100 S. 4<sup>th</sup> Ave 48104, 30 vouchers at 600 W. Huron 48104, 10 vouchers at 2270 Platt Road 48108, and 6 vouchers at 100-106 and 112-114 Glendale 48103. The AAHC issued a Project-Based Voucher RFP on February 2, 2023, for up to 175 vouchers in the City of Ann Arbor. The AAHC received applications for 50 project-based vouchers. The AAHC conditionally approved 50 vouchers with the following projects: 18 vouchers Hickory Way III and 32 vouchers 121 E Catherine.
- b. Statement of need Consistent to PHA Plan: AAHC will project-base up to 20% of the AAHC's budget authority to de-concentrate poverty and expand housing and economic opportunities for very low-income, homeless, and special needs households in the City of Ann Arbor and other high opportunity areas in Washtenaw County. The AAHC prioritizes PBV on Permanent Supportive Housing units. These activities are consistent with the AAHC's 5-year and Annual Plan as well as AAHC's mission.

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- i. The AAHC was approved by HUD on December 27, 2022, to project base up to 125 additional vouchers. AAHC issued a Project-Based Voucher RFP on October 18, 2023, for up to 50 vouchers throughout Washtenaw County.
- 4) Increase supportive housing for residents with complex needs spanning from homelessness, mental illness, substance use disorders, and/or other physical/mental disabilities.
  - a. Increase support services for tenants in affordable housing and voucher program
  - b. Through community partnerships
  - c. Additional funding sources
  - d. Continue to work with partners and provide support to eligible families

### ***Continuum of Care (CoC)***

The AAHC partnered with Avalon Housing and Ozone House to provide housing and services to chronically homeless individuals and families through the HUD Continuum of Care program. A minimum of 59 of these households will be housed at AAHC properties and Avalon and Ozone House will be providing on-site services. These funds have enabled Avalon to provide 24/7 services at Miller Manor. In FY21, all of the CoC grants have been transferred to Avalon Housing to administer.

### ***Support Service HCV Eviction Prevention***

The AAHC is partnering with SOS to hire a case manager to help AAHC voucher tenants maintain their vouchers.

The coordinated support service allows assist families to lease up in Ann Arbor and resolve landlord/tenant issues such as securing funds to avoid eviction and/or assistance with securing funds for outstanding utility bills and were able to retain their housing. AAHC will continue contracting services with SOS to provide voucher families assistance in maintaining their assistance.

### ***Support Service On-site PBV***

The AAHC partnered with Avalon Housing & Peace Neighborhood Center & Community Action Network to provide on-site services for tenants at West Arbor, Miller Manor, Maple Meadows, Hikone, Green-Baxter, and Baker Commons.

The AAHC is partnering with CAN and Avalon to provide on-site services at the new State Crossing and Creekside Court Community Centers, respectively.

The AAHC is partnering with Huron Valley PACE to provide on-site services at the newly acquired senior housing property, Lurie Terrace.

### ***Additional Voucher Support Services***

The AAHC is partnering with Avalon Housing and Michigan Ability Partners to assist AAHC voucher waitlist applicants lease up successfully and to provide ongoing support services.

### ***Family Unification Program (FUP)***



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The AAHC has partnered with the Michigan Department of Health and Human Services (MDHHS), Washtenaw County Continuum of Care (CoC), and Ozone House to provide housing assistance to 32 families for the HCV Family Unification Program. AAHC continues to provide housing to eligible families.

The Family Unification Program (FUP) is a program under which Housing Choice Vouchers (HCVs) are provided to two different populations: Families for whom the lack of adequate housing is a primary factor in: the imminent placement of the family's child or children in out-of-home care, or the delay in the discharge of the child or children to the family from out-of-home care. In addition, Eligible youths who have attained at least 18 years and not more than 24 years of age and who have left foster care, or will leave foster care within 90 days, and is homeless or is at risk of becoming homeless at age 16 or older.

In addition to rental assistance, supportive services must be provided by the MDHHS to FUP youths for the entire 18 months in which the youth participate in the program; examples of the skills targeted by these services include money management skills, job preparation, educational counseling, and proper nutrition and meal preparation.

### ***Non-Elderly Disabled Mainstream Voucher (NED)***

The AAHC has partnered with 11 agencies to administer the NED Voucher program, all of whom serve persons with disabilities as a cornerstone of their non-profit mission or public agency purpose. HUD awarded AAHC 45 voucher for the NED program in 2018; 90 vouchers in 2019; and 41 vouchers in 2020. AAHC continues to provide housing to eligible families.

NED HCVs enables non-elderly disabled families to lease affordable private housing of their choice. NED vouchers also assist persons with disabilities who often face difficulties in locating suitable and accessible housing on the private market. The target population for the NED program are any household that includes one or more non-elderly person with disabilities.

In addition, eligible families included non-elderly persons with disabilities who are transitioning out of institutional or other segregated settings, at serious risk of institutionalization, currently experiencing homelessness, or those at risk of experiencing homelessness.

### ***Emergency Housing Vouchers***

AAHC received an award of 29 Emergency Housing Vouchers (EHV) effective July 1, 2021. The Emergency Housing Voucher (EHV) program is available through the American Rescue Plan Act (ARPA). Through EHV, AAHC assist individuals and families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability.

AAHC works with the CoC and its other homeless services/victim services referral partners in determining which activities it will undertake in support of EHVs participants. Activities such as housing search assistance, assistance with security

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deposit, utility deposit, rental application, holding fees, and other related uses are intended to prevent and respond to housing instability.

### **Additional Vouchers**

AAHC received 22 new voucher increments from HUD; 16 in October 2022, and 6 in August 2023. Due to a competitive rental market around the country, it's increasingly becoming necessary to help families lease units. As a result, HUD revisited its current guidance on the eligible uses of administrative fees allowing PHA's to expanding such activities to cover costs that encourage housing stability for participants. To ensure success, AAHC administers funds directly to our partners that provide services to participating families that fit their specific needs.

Administrative activities also include housing search assistance activities such as pre-move counseling, helping a family identify and visit potentially available units during their housing search, helping a family find a unit that meets the household's disability-related needs, providing transportation and directions, and assisting with the completion of rental applications. These activities also include post-lease up activities often related to housing search assistance efforts, such as post-move counseling and landlord/tenant mediation. These activities cover HCV owner recruitment and outreach activities, including the costs associated with materials or webpages specifically geared to owners, as well as landlord liaison staff and associated expenses.

### **City of Ann Arbor General Fund Support**

The City of Ann Arbor allocated \$525,000 in FY20; \$535,000 in FY21; \$546,000 in FY22 and over \$1.1 million in FY23 for tenant mental health and other supportive services for AAHC tenants and Voucher program participants. These funds are partially funding the programs listed above.

### **Section B.7 Resident Advisory Board**

The Resident Advisory Board (RAB) held on November 9, 2022

This annual public, meeting of the Resident Advisory Board focused on the AAHC's Annual Plan and HUD's Moving To Work (MTW) Demonstration Program as a member of Cohort #4— Landlord Incentives.

**ATTENDEES:** Weneschia Brand (AAHC), Arin Yu (AAHC), Terrance Heiligh (AAHC), Alacia Upthegrove, and Sherry Ragay.

### **DISCUSSION:**

**Brand:** AAHC staff can be reached for additional comments and questions at [www.a2gov.org/housingcommission](http://www.a2gov.org/housingcommission)

### **Landlord Incentives**

AAHC is a participant in Moving To Work Cohort #4— Landlord Incentives. Participation in this cohort provides AAHC the opportunity to adopt policies that incentivize landlord participation in the Section 8 Voucher program. AAHC plans to provide damage loss payments, signing bonuses, and vacancy loss

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payments to landlords that rent to Section 8 Voucher participants. AAHC also plans to assist participants with providing security deposits and paying application fees.

The Ann Arbor Housing Commission discussed the Final Rule implementing Sections 102, 103, and 104 of the Housing Opportunity Through Modernization Act of 2016 (HOTMA) regulation changes for future adoption, with the Resident Advisory Board:

### Section 102: Income Reviews

**Fewer Interim Reexaminations:** HOTMA creates a 10% adjusted income increase/decrease threshold for conducting Interim Reexaminations, and in most cases requires that increases in earned income are not processed until the next Annual Reexamination, allowing families to keep more of their earnings before receiving a rent increase. The new requirements should lead to fewer Interim Reexaminations overall, alleviating burden for both participants and PHAs.

**Streamlined Verifications:** Several provisions will streamline the verification process for housing providers.

**Adults Only Need to Sign Consent Form Once:** HOTMA revises the required consent form that all adult household members sign, allowing them to sign the form only once instead of annually.

**Use of Income Determinations from Other Programs:** HOTMA allows PHAs to use income determinations made under other federal benefits programs for reexaminations.

**Review of EIV Not Required at Interim Reexamination:** HOTMA eliminates the requirement for PHAs to use EIV to verify tenant employment and income information during an interim reexamination, significantly reducing administrative burden.

**Increased Standard Deduction for Elderly/Disabled Households:** HOTMA increases standard deductions for families with a head, co-head, or spouse who is elderly or a person with a disability.

**Additional Income Exclusions:** The rule codifies additional income and asset exclusions, including:

- Amounts received from Medicaid or other state/local programs meant to keep a family member with a disability living at home
- Veterans' aide and attendant care
- Distributions of principal from non-revocable trusts, including Special Needs Trusts.

**Threshold for Claiming Medical/Disability Expenses Increased:** HOTMA increases the allowance for unreimbursed health and medical care expenses from 3% of annual income to 10%, phased-in over two years.

**Higher Threshold for Imputing Asset Income:** HOTMA raises the imputed asset threshold from \$5,000 to \$50,000, incentivizing families to build wealth without imputing income on those assets.

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

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

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

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

Asset Limitation: HOTMA imposes a \$100,000 asset limit for eligibility and continued assistance. Families are also ineligible for assistance if they own real property suitable for occupancy. PHAs have the option of delaying enforcement/termination for up to six months if the family is over the asset threshold at the time of annual reexamination.

Exclusion of Retirement and Educational Savings Accounts: Retirement accounts and educational savings accounts will not be considered a net family asset. This is a major benefit to families, incentivizing savings for important life milestones and opportunities. This will also provide significant administrative relief to PHAs by allowing them to stop verifying and calculating these assets altogether.

Self-Certification of Assets under \$50,000: HOTMA allows self-certification of net assets if estimated to be at or below \$50,000. This will be a time-savings for families and lower administrative burden for PHAs recertifying income.

### **Cross-Cutting**

Adjustments for Inflation: Deductions and the asset limitation will be adjusted for inflation annually, ensuring that deductions do not lose value over time and that families are able to build more wealth without losing program assistance. The current deduction amounts have never been adjusted.

Resident Advisory Board Discussion:

**OTHER RESIDENT INPUT:** *None*

**CHALLENGED ELEMENTS TO PLAN:** *None*