

## Summary of Proposed Changes to the Administrative Plan for 2026

HABC has updated the format and organization of the Administrative Plan for clarity and increased ease of navigation. In addition to these formatting and structural changes, HABC has revised the Plan’s language to reflect updates to HABC policies as well as new or revised regulatory requirements. The chart below summarizes and details these changes. Non-substantive edits, such as minor grammatical corrections or rewording for clarity, are not included in the chart.

	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
Chapter 1: Overview of the Program			
1.	Chapter 1: Overview of the Program	<ul style="list-style-type: none"> <li>Chapter 1: Statement of Policies and Objectives</li> </ul>	<ul style="list-style-type: none"> <li>Reorganized chapter for clarity, added general program information, added visuals, and made updates to HABC-specific content including mission, vision, core values, and goals.</li> </ul>
2.	1.4.4 Regulatory and Statutory Waivers During Emergencies	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added language about CHA adopting HUD-published regulatory and/or statutory waivers to respond to declared states of emergency: <i>“During periods of declared states of emergency...HABC may adopt HUD published regulatory and/or statutory waivers to respond to the emergency”.</i> (excerpt)</li> </ul>
3.	1.4.5 Insufficient Funding	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added language giving HABC the ability to modify policies in the event of a funding shortfall: <i>“In the event of an actual or projected funding shortfall, HABC may modify its policies to comply with HUD requirements and/or improve the financial stability of the HCV program. As part of its shortfall action plan, HABC may temporarily or permanently waive or amend provisions of the Administrative Plan and/or implement other measures as necessary. Such actions may include, but are not limited to, adjusting voucher issuance, revising payment standards, capping rent increases, and modifying other applicable policies or provisions.”</i></li> </ul>
4.	1.5.1 Chart of MTW Policies	<ul style="list-style-type: none"> <li>1.7 MTW Policies</li> </ul>	<ul style="list-style-type: none"> <li>Updated chart of MTW policies to account for additional approved activities, including payment standard policies approved in 2025.</li> </ul>
Chapter 2: Fair Housing and Equal Opportunity			
5.	Chapter 2: Fair Housing and Equal Opportunity	<ul style="list-style-type: none"> <li>Chapter 1.C. Fair Housing and Non-Discrimination</li> </ul>	<ul style="list-style-type: none"> <li>Made section its own chapter and adds additional detail regarding applicable laws and regulations.</li> <li>Added section on policies related to persons with disabilities and related definitions.</li> <li>Added sections on Limited English Proficiency (LEP) and Violence Against Women Act (VAWA) provisions, and reference links to related Appendices.</li> </ul>
6.	2.3 Discrimination Complaints	<ul style="list-style-type: none"> <li>8.4 Discrimination Complaints</li> </ul>	<ul style="list-style-type: none"> <li>Moved to Fair Housing and Equal Opportunity chapter (from Voucher Issuance and Briefings chapter)</li> </ul>
7.	2.4.2 VAWA Notifications	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added when families will be provided with the VAWA Notice of Occupancy Rights: (1) when an applicant is denied, (2) at admission to the HCV program, and (3) with any notification of termination of assistance.</li> </ul>
8.	2.4.7 Response to Conflicting Documentation	<ul style="list-style-type: none"> <li>1.12.4 Terminating Assistance of a VAWA Offender</li> </ul>	<ul style="list-style-type: none"> <li>Reworded section on HABC’s response to conflicting documentation, for additional clarity:</li> </ul>

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			<i>“In cases where HABC received conflicting certification documents from two or members of a household...HABC may determine which is the true victim by requiring third-party documentation...must be submitted within 30 calendar days.” (excerpt)</i>
9.	2.4.9 VAWA Record Retention	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added requirement to retain VAWA-related information for a period of at least three (3) years.</li> </ul>
10.	2.5 Policies Related to Persons with Disabilities	<ul style="list-style-type: none"> <li>1.13 Reasonable Accommodations Policy</li> </ul>	<ul style="list-style-type: none"> <li>Clarified there are two definitions of a disability; one definition of individuals with disability for the disabled deduction and another for individuals with disability for a reasonable accommodation.</li> </ul>
11.	2.7 Limited English Proficiency and Language Interpretation	<ul style="list-style-type: none"> <li>1.14 Language Interpretation of Documents, American Sign Language (ASL) Interpretation.</li> </ul>	<ul style="list-style-type: none"> <li>Added the following steps HABC will take to determine the appropriate level of language assistance to individuals who need information or services in a language other than English: (1) assess the number of LEP persons, (2) assess the frequency of interaction, (3) determine the nature of the service, and (4) any available resources and costs.</li> </ul>
Chapter 3: Waiting List & Applications			
12.	Chapter 3: Waiting List and Applications	<ul style="list-style-type: none"> <li>Chapter 3: Applying for Admissions</li> </ul>	<ul style="list-style-type: none"> <li>Combined chapter 3 (Applying for Admissions) and chapter 4 (Establishing Preferences and Maintaining the Waiting List) into one chapter.</li> <li>Updated introduction and reworded sections to clarify HABC policy.</li> </ul>
13.	3.2.1 HABC Waiting Lists	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Revised language to clarify that HABC has individual waiting lists for Tenant-Based Voucher (TBV) and Project-Based Voucher (PBV) assistance.</li> </ul>
14.	3.2.4 Reporting Changes While on the Waiting List	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> <li>2.3.12 Split Households Prior to Voucher Issuance</li> </ul>	<ul style="list-style-type: none"> <li>Added guidance regarding family changes while waiting on the waiting list: <i>“Failure to report changes may affect an applicant’s placement on the waiting list(s) and may result in removal.”</i></li> <li>Added/clarified language regarding family break-up while on the waiting list. Specifically, in the case of family break-up, HABC will consider: (1) the interest of any minor children, (2) the interest of any elderly or disabled family members, (3) the interest of any family member who is a victim of domestic violence, dating violence, sexual assault, stalking, and/or human trafficking, (4) any possible risks to family members, and (5) recommendations of social service professionals.</li> </ul>
15.	3.2.5 Removal from the Waiting List	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added clarity that applicants removed from one list will have no effect on status on other waiting lists: <i>“The applicant will be removed only from the waiting list for which the outreach was for.” (excerpt)</i></li> </ul>
16.	3.3.1 Special Admissions	<ul style="list-style-type: none"> <li>4.8 Special Admissions</li> </ul>	<ul style="list-style-type: none"> <li>Moved from Establishing Preferences chapter and modified for clarity.</li> </ul>
17.	3.3.2 Special Programs	<ul style="list-style-type: none"> <li>4.7 Special Program Categories</li> </ul>	<ul style="list-style-type: none"> <li>Named the targeted funding programs HABC administers: (1) Mainstream, (2) Non-Elderly Disabled (NED) Category II, (3) Family Unification Program (FUP), (4) Veterans Affairs Supportive Housing (VASH), and (5) Emergency Housing Vouchers (EHV).</li> </ul>

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18.	3.4 Preferences	<ul style="list-style-type: none"> <li>4.3.1 Local Preferences</li> </ul>	<ul style="list-style-type: none"> <li>Clarified explanation of the use of preferences, whereby applicants may be selected in orders other than by application date and time:  <i>“While all applicants must meet basic eligibility requirements, those who qualify for a preference may receive assistance before others who applied earlier.”</i> (excerpt)</li> <li>Added guidance related to who may not be eligible for a local preference; for example, applicants who have been evicted from other housing assistance programs within the past three years due to drug-related criminal activity, or have made false statements in order to qualify for a local preference.</li> </ul>
19.	3.4.1 HABC Set-Aside/Limited Preference Categories	<ul style="list-style-type: none"> <li>4.9-4.13</li> </ul>	<ul style="list-style-type: none"> <li>Reorganized sections on limited preferences/”set-asides”.</li> <li>Added preference for FUP Youth whose assistance under the FUP program is expiring.</li> <li>Added note that Healthy Opportunities Program will end in 2025.</li> <li>Moved Student Housing Initiative (SHI) from other chapter</li> <li>Moved information on Special Purpose Voucher (SPVs) such as VASH, NED, FUP, and Mainstream to the SPV chapter.</li> </ul>
20.	3.4.2 Local Preferences	<ul style="list-style-type: none"> <li>4.3.1 Local Preferences</li> </ul>	<ul style="list-style-type: none"> <li>Added reference to RAD Choice mobility turnover cap: <i>“HABC may limit the number of HCVs issued under the RAD Choice-Mobility Option for PBRA conversions to no more than one-third (33%) of its annual turnover vouchers in any calendar year.”</i></li> </ul>
21.	3.4.3 Other Preferences	<ul style="list-style-type: none"> <li>PIH Notice 2024-30</li> </ul>	<ul style="list-style-type: none"> <li>Added preference on HABC’s TBV waiting list for families who are currently assisted through HABC’s EHV program and who are at risk of termination due to the lack of continued program funding.</li> <li>HABC will not apply a residency preference to Mainstream voucher applicants. Added language regarding the ability for HABC to establish a separate waiting list for Mainstream vouchers, at HABC’s discretion.</li> </ul>
22.	3.5 Applying for Admission	<ul style="list-style-type: none"> <li>3.2 Overview of the Application Process</li> </ul>	<ul style="list-style-type: none"> <li>Clarified that initial application is a pre-application:  <i>“To be considered for the HCV program, individuals and families must first submit a complete pre-application when the waiting list is open...”</i> (excerpt)</li> </ul>
23.	3.6.1 Notification of Selection	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added process of notifying the family in writing upon selection from the waiting list. Family will be withdrawn for failure to respond.</li> </ul>
24.	3.6.2 Application Completion and Interview	<ul style="list-style-type: none"> <li>3.7 Application Completion and Interview</li> </ul>	<ul style="list-style-type: none"> <li>Specified that an interview will take place to complete full program application:  <i>“When an applicant reaches the top of the waiting list, HABC will send a written notice scheduling an eligibility interview...”</i> (excerpt)  <i>“Applicants who miss two scheduled appointments or cannot be reached will be withdrawn from the waiting list.”</i> (excerpt)</li> </ul>
Chapter 4: Eligibility for Admission			

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25.	4.3.10 Persons with Disability and Disabled Family	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added definitions of persons with disabilities and disabled families, and referenced two definitions of disabled persons as described in the Fair Housing and Equal Access chapter.</li> </ul>
26.	4.3.18 Full-Time Students	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added definition of full-time student. <i>"A full-time student is a person who is attending school or vocational training on a full-time basis."</i></li> </ul>
27.	4.3.19 Veteran	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added definition of veteran <i>"A veteran is a person who served in the armed forces of the United States (Army, Navy, Air Force, Marines,...)..."</i></li> </ul>
28.	4.4.1 Income Limits	<ul style="list-style-type: none"> <li>Glossary</li> </ul>	<ul style="list-style-type: none"> <li>Added extremely low-income family definition. <i>"Extremely low-income family. A family whose annual income does not exceed the federal poverty level or 30% of the median income for the area, whichever number is higher."</i></li> </ul>
29.	4.4.3 Income Limits for VASH	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added link to Special Purpose Voucher Programs chapter, which describes alternative income determination and income limits for the VASH program.</li> </ul>
30.	4.5 Citizenship or Eligible Immigration Status	<ul style="list-style-type: none"> <li>2.6 Citizenship/Eligible Immigration Status</li> </ul>	<ul style="list-style-type: none"> <li>Added guidance related to the family's requirement to declare citizenship of all members,</li> <li>Added definitions, guidance, and requirements regarding U.S. citizens and nationals, eligible non-citizens, ineligible non-citizens, and mixed families. <i>"Each family member must declare whether he/she is a citizen, a national, eligible non-citizen, or an individual who elects not to contend that they have eligible immigration status."</i></li> <li>Provided guidance related to ineligible families and the timeframe to determine citizenship status.</li> <li>Established timeframes for determination of citizenship status: HABC will require citizenship documents in the normal timeframe for eligibility documents and will provide one 30-day extension. <i>"If the family fails to submit required evidence of eligible immigration status within the time period specified in the notice...HABC will proceed to deny assistance."</i></li> </ul>
31.	4.6 Social Security Numbers	<ul style="list-style-type: none"> <li>2.5 Mandatory Social Security Numbers</li> </ul>	<ul style="list-style-type: none"> <li>Updated requirements and verification guidelines for social security numbers. <i>"The applicant and all members of the applicant's household must disclose the complete and accurate Social Security number (SSN) assigned to each household member, and the documentation necessary to verify each SSN."</i> (excerpt)</li> <li>Added language regarding the timeframe to submit documentation of SSN: <i>"Assistance cannot be provided to the family until all SSN documentation requirements are met." "If a child under age 6 has been added to an applicant family within 6 months prior to voucher issuance, an otherwise eligible family maybe admitted to the program and must disclose and document the child's SSN within 90 days of the effective date of the initial HAP contract."</i> (excerpt)</li> </ul>

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32.	4.7.3 Authorization for the Release of Information	<ul style="list-style-type: none"> <li>3.7.1 Requirement to Attend Interview</li> </ul>	<ul style="list-style-type: none"> <li>Created subsection with updated MTW policy that applicants and participants must sign the MTW Authorization for Release of Information instead of the HUD-9886-A form.</li> <li>Clarified that Mod Rehab households are still subject to regulatory consent forms.</li> </ul>
33.	4.9.5 VASH Screening	<ul style="list-style-type: none"> <li>HUD/VASH Operating Notice August 2024</li> </ul>	<ul style="list-style-type: none"> <li>Added guidelines for screening VASH applicants – may only screen for an income limit and lifetime sex offender registration: <i>“Eligibility screening for VASH vouchers is limited to two criteria...”</i> (excerpt)</li> </ul>
Chapter 5: Subsidy Standards			
34.	General	<ul style="list-style-type: none"> <li>Revised chapter for clarity</li> </ul>	<ul style="list-style-type: none"> <li>Revised language throughout the chapter for clarity.</li> </ul>
35.	5.2 Determining Voucher (Family Unit) Size	<ul style="list-style-type: none"> <li>5.2 Determining Voucher (Family Unit) Size</li> </ul>	<ul style="list-style-type: none"> <li>Replaced <i>“HABC does not determine who shares a bedroom, but there must be at least one person per bedroom on the voucher”</i> with <i>“For each family, HABC determines the appropriate voucher size under HABC subsidy standards and enters the family unit size on the voucher that is issued.”</i></li> </ul>
36.	5.2.2 Determining Voucher Size	<ul style="list-style-type: none"> <li>5.3 Parameters for Determination of Voucher Size</li> </ul>	<ul style="list-style-type: none"> <li>Removed stipulation that a foster child must reside in the unit for 180+ calendar days to be included in determining voucher size.</li> </ul>
37.	5.3 Temporarily and Permanently Absent Members	<ul style="list-style-type: none"> <li>Chapter 6: Factors Related to TTP</li> </ul>	<ul style="list-style-type: none"> <li>Moved definition of temporarily and permanently absent family members from Determining TTP chapter to subsidy standards chapter.</li> <li>Added definition of shared custody: <i>“Children subject to shared custody may be provided space according to subsidy standards if they will reside in the assisted household at least 51 percent of the year.”</i></li> <li>Added guidance for absent students, absences due to placement in foster care, absence due to incarceration, absence due to military service, absence for nursing home confinement, and return of permanently absent family members.</li> </ul>
38.	5.4.1 Request for Exceptions to Subsidy Standards	<ul style="list-style-type: none"> <li>5.4.1 Request for Exceptions to Subsidy Standards</li> </ul>	<ul style="list-style-type: none"> <li>Clarified that HABC will only issue a larger voucher due to additions of the family by birth, adoption, foster care, marriage, and court awarded custody.</li> <li>Clarified that HABC will only alert the family to medical exceptions if alerted to potential conflicts.</li> </ul>
39.	5.5 Unit Size Selected	<ul style="list-style-type: none"> <li>5.5 Unit Size Selected</li> </ul>	<ul style="list-style-type: none"> <li>Removed subsection related to unit size as it is addressed in MTW Policy box: <i>“The participant must select a unit consistent with and not greater than the dwelling unit size listed on their voucher.”</i></li> </ul>
Chapter 6: Voucher Issuance and Briefings			
40.	General	<ul style="list-style-type: none"> <li>Revised chapter for clarity</li> </ul>	<ul style="list-style-type: none"> <li>Revised language throughout the chapter for clarity.</li> </ul>

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41.	6.2 Voucher Briefing	<ul style="list-style-type: none"> <li>8.3 Briefing Types and Required Attendance</li> </ul>	<ul style="list-style-type: none"> <li>Reorganized and added subsections to include process for notification and how the briefing will be conducted. <ul style="list-style-type: none"> <li>Notification will be in writing that will explain the briefing type, identify who is required to participate, and date and time of the briefing.</li> <li>Briefings will be conducted in English and will explain how the program works. Translation available upon request.</li> </ul> </li> <li>Explained that HABC may conduct an abbreviated oral briefing after the family's first full briefing.</li> <li>Updated the information that will be provided in the voucher briefing packet.</li> </ul>
42.	6.3 Issuance of Voucher	<ul style="list-style-type: none"> <li>8.2 Issuance of Voucher</li> </ul>	<ul style="list-style-type: none"> <li>Added <i>"The voucher is the family's authorization to search for housing. It specifies the unit size for which the family qualifies and includes both the date of voucher issuance and date of expiration."</i></li> </ul>
43.	6.3.1 Term of Voucher	<ul style="list-style-type: none"> <li>8.6 Term of Voucher</li> </ul>	<ul style="list-style-type: none"> <li>Updated initial term date from 90 days to 120 days.</li> <li>VASH, EH, FUP, and Mainstream vouchers will always have an initial term of 120 days.</li> <li>Updated expirations/extensions and Tolling subsections to match approved Voucher Term Board Resolution.</li> <li>Added updated requirements regarding voucher extensions for Mainstream and FUP participants.</li> </ul>
44.	6.3.3 Tolling	<ul style="list-style-type: none"> <li>8.6.2 Tolling</li> </ul>	<ul style="list-style-type: none"> <li>Updated tolling example using a voucher term of 120 days rather than 90 days.</li> </ul>
45.	6.5.2 Housing Search Assistance to Voucher Holders	<ul style="list-style-type: none"> <li>8.6.3 Assistance to Voucher Holders</li> </ul>	<ul style="list-style-type: none"> <li>Added: <i>"Voucher holders will be notified at their briefing session that <a href="http://www.AffordableHousing.com">www.AffordableHousing.com</a> (formerly GoSection8.com) is periodically updated and how the updated list may be obtained. Families who need additional assistance during their search may call HABC's Leasing and Contracting Office to request assistance."</i></li> </ul>
Chapter 7: Verification			
46.	General	<ul style="list-style-type: none"> <li>Revised chapter for clarity</li> </ul>	<ul style="list-style-type: none"> <li>Revised language throughout the chapter for clarity. Reorganized chapter layout for ease of navigation.</li> </ul>
47.	7.2 General Verification Requirements	<ul style="list-style-type: none"> <li>7.4 Requirements for Acceptable Documents</li> </ul>	<ul style="list-style-type: none"> <li>Added: <i>"Any documents used for verification should be the original (not photocopies), and printouts from websites or web pages are considered original documents."</i></li> </ul>
48.	7.2.2 Response to Verification Request	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added subsection including: <i>"Families have five business days to respond to HABC requests for information. Exceptions may be granted on a case-by-case basis."</i> (excerpt)</li> </ul>
49.	7.3 Family Consent to Release of Information	<ul style="list-style-type: none"> <li>7.2 MTW Release of Information</li> </ul>	<ul style="list-style-type: none"> <li>Reworded for clarity.</li> </ul>
50.	7.4 Verification Hierarchy	<ul style="list-style-type: none"> <li>7.3 Methods of Income Verification and Time Allowed</li> </ul>	<ul style="list-style-type: none"> <li>Reorganized verification hierarchy and removed reference to prior verification methods (the Work Number and RIM guidance).</li> <li>Added: <i>"Moderate Rehab participants will be subject to the standard HUD verification hierarchy."</i></li> </ul>
51.	7.4.1 Enterprise Income Verification (EIV) System	<ul style="list-style-type: none"> <li>Not in previous Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added subsection that provides detailed examples of the use of EIV Income report.</li> </ul>

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			<ul style="list-style-type: none"> <li>Explained use of EIV for new admissions and for participants at reexamination.</li> <li>Included use of required HUD reports not previously included (Income Validation Tool, Identity Verification report, Deceased tenants report, etc.).</li> </ul>
52.	7.4.2 Upfront Income Verification (UIV)	<ul style="list-style-type: none"> <li>7.3.1 Upfront Income Verification</li> </ul>	<ul style="list-style-type: none"> <li>Gave examples of UIV and added <i>"UIV will be used to the extent that these systems are available to HABC."</i></li> </ul>
53.	7.4.3 Third-Party Verification	<ul style="list-style-type: none"> <li>7.3.2 Written Third-Party Verification</li> </ul>	<ul style="list-style-type: none"> <li>Added <i>"Any of the following verification methods may be used by HABC in no particular order."</i></li> <li>Explained difference between written third-party documents provided by the family, a written third-party form sent directly to a source, and oral third-party received over the phone.</li> </ul>
54.	7.4.4 Self-Certification	<ul style="list-style-type: none"> <li>7.3.4 Tenant Declaration (Level 1)</li> </ul>	<ul style="list-style-type: none"> <li>Clarified that self-certification is to be used as a last resort when HABC is unable to obtain third-party verification.</li> <li>Added <i>"HABC may require a family to certify that a family member does not receive a particular type of income or benefit."</i></li> <li>Added list of items the family can attest by self-certification: <i>"A source that is fully excluded, net family assets under \$50,000, declaration of ownership in real property, and certification of non-recurring income."</i></li> <li>Added a list of items the family cannot attest by self-certification: <i>"...social security/SSI benefits, public assistance, disability, unemployment, veteran's pension, court-ordered child support, worker's compensation, unreimbursed medical expenses, and full-time student status."</i></li> </ul>
55.	7.4.5 When Third-Party Verification is Not Required	<ul style="list-style-type: none"> <li>Not in current Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added guidance that explains third-party verification will not be required: <ul style="list-style-type: none"> <li>If there is a service charge</li> <li>If the primary source is a legal document like a birth certificate</li> <li>Assets disposed of for less than fair market value</li> <li>Self-certification of assets</li> <li>If source of income is fully excluded</li> </ul> </li> </ul>
56.	7.5.1 Substantial Difference	<ul style="list-style-type: none"> <li>7.13 Computer Matching and Income Discrepancies</li> </ul>	<ul style="list-style-type: none"> <li>Added <i>"If third-party information differs substantially from family-provided information, HABC reserves the right to request additional verification information and use any other verification method in priority order to reconcile the difference."</i></li> <li>Clarified the threshold for substantial difference is \$5,000 annually.</li> </ul>
57.	7.5.2 Fraud	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added language explaining fraud and provided links for more information. <i>"Information provided by the family that proves to be untrue may be used to disqualify the applicant for admission or terminate the participant's assistance on the basis of attempted fraud."</i></li> </ul>

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58.	7.6 Verification of Legal Identity	<ul style="list-style-type: none"> <li>7.7.2 Verification of Legal Identity</li> </ul>	<ul style="list-style-type: none"> <li>Added <i>“HABC may, at its discretion, allow the submission of expired documents to verify legal identity.”</i></li> </ul>
59.	7.8 Verification of Social Security Numbers	<ul style="list-style-type: none"> <li>7.7.13 Verification of Social Security Numbers</li> </ul>	<ul style="list-style-type: none"> <li>Reworded subsection and added <i>“The family must provide documentation of a valid social security number for each member of the household, with the exception of individuals who do not contend eligible immigration status.”</i></li> </ul>
60.	7.8.1 Documents Used to Verify Social Security Numbers	<ul style="list-style-type: none"> <li>7.7.13 Verification of Social Security Numbers</li> </ul>	<ul style="list-style-type: none"> <li>Created subcategories to describe documents needed and guidance when the member is under the age of 6.</li> <li>Clarified that social security numbers need only be verified once unless there is a discrepancy.</li> </ul>
61.	7.8.2 Adding a Family Member who is a Child Under Six who Lack a Social Security Number	<ul style="list-style-type: none"> <li>7.7.13 Verification of Social Security Numbers</li> </ul>	<ul style="list-style-type: none"> <li>Added: <i>“When a participant requests to add a new household member who is at least 6 years of age, the participant must provide the complete and accurate SSN assigned to the new member at the time of the reexamination, in addition to the documentation required to verify it. HABC will not add the new household member until such documentation is provided.”</i></li> </ul>
62.	7.9 Verification of Age	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added: <i>“If an official record of birth or evidence of Social Security retirement benefits cannot be provided, HABC will require the family to submit other documents that support the reported age of the family member (e.g., school records, driver’s license if birth year is recorded) and to provide a self-certification.”</i></li> </ul>
63.	7.10.1 Marriage	<ul style="list-style-type: none"> <li>7.7.3 Verification of Marital Status</li> </ul>	<ul style="list-style-type: none"> <li>Added: <i>“Certification by the head of household is normally sufficient verification of marriage. If HABC has reasonable doubts about a marital relationship, HABC will require the family to document the marriage.”</i></li> </ul>
64.	7.10.2 Separation or Divorce	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added: <i>“HABC may require the family to provide documentation of the divorce or separation with a certified copy of a divorce decree, signed by a court officer; a copy of a court-ordered maintenance or other court record; or other documentation that shows a couple is divorced or separated.”</i></li> </ul>
65.	7.10.3 Verification of Guardianship	<ul style="list-style-type: none"> <li>7.7.6 Verification of Change in Family Composition</li> </ul>	<ul style="list-style-type: none"> <li>Added: <i>“HABC may require the family to provide court-ordered assignment or verification from a social services agency if there is a dispute over custody or the parent is not listed on the birth certificate.”</i></li> </ul>
66.	7.11 Verification of Family Member Absence	<ul style="list-style-type: none"> <li>7.7.5 Verification of Permanent Absence of ANY Family member</li> </ul>	<ul style="list-style-type: none"> <li>Clarified a member who is incarcerated may prompt an investigation of family obligations.</li> <li>Added <i>“For foster children and foster adults, third-party verification from the state or local government agency responsible for the placement of the foster child or foster adult with the family is required.”</i></li> </ul>
67.	7.13 Student Status Verification	<ul style="list-style-type: none"> <li>7.7.7 Verification of Full-time Student Status</li> </ul>	<ul style="list-style-type: none"> <li>Added when HABC would required families to provide information about the status of adult students: <ul style="list-style-type: none"> <li>○ If the family would receive a deduction</li> <li>○ If the family claims a childcare deduction to further his or her education</li> <li>○ The student is enrolled in an institution of higher education.</li> </ul> </li> </ul>
68.	7.13.1 Verification of Restrictions on Assistance to Students	<ul style="list-style-type: none"> <li>24 CFR 5.6.12</li> </ul>	<ul style="list-style-type: none"> <li>Single students will be determined eligible using their parents’ income unless: <ul style="list-style-type: none"> <li>○ The school is not an institution of higher education</li> <li>○ The student is older than 24 years old</li> </ul> </li> </ul>



# Summary of Proposed Changes to the Administrative Plan for 2026

	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
			<ul style="list-style-type: none"> <li>○ The student is a veteran</li> <li>○ The student is married</li> <li>○ The student has one dependent child or</li> <li>○ The student is a person with disabilities receiving assistance prior to 11/30/05</li> <li>• Added guidance to requesting parental income</li> <li>• Added verification of student financial assistance and fees</li> </ul>
69.	7.14 Verification of Disability	<ul style="list-style-type: none"> <li>• 7.7.8 Verification of Disability</li> </ul>	<ul style="list-style-type: none"> <li>• Removed verification criteria (now mentioned in Chapter 2) and listed verification reasons: <ul style="list-style-type: none"> <li>○ Determine waiting list preference</li> <li>○ All certain income disallowances and deductions from income</li> </ul> </li> <li>• Listed EIV as primary source for verification of disability income</li> </ul>
70.	7.15 Verification of US Citizenship and Eligible Immigration Status	<ul style="list-style-type: none"> <li>• 7.7.9 Verification of Citizenship/Eligible Immigrant Status</li> </ul>	<ul style="list-style-type: none"> <li>• Added:  <i>“The documentation required for eligible non-citizens varies depending upon factors such as the date the person entered the U.S., the conditions under which eligible immigration status has been granted, age, and the date on which the family began receiving HUD-funded assistance.  For family members aged 62 or older who claim to be eligible immigrants, proof of age is required; however, no further verification of eligible immigration status is required.  For family members under the age of 62 who claim to be eligible immigrants, HABC will verify immigration status with the U.S. Citizenship and Immigration Services (USCIS). HABC will follow all USCIS protocols for verification of eligible immigration status.”</i> </li> </ul>
71.	7.15.1 Timing of Verification	<ul style="list-style-type: none"> <li>• 7.7.10 Time of Verification</li> </ul>	<ul style="list-style-type: none"> <li>• Removed language that is no longer applicable.</li> </ul>
72.	7.16 Verification of Waiting List Preferences	<ul style="list-style-type: none"> <li>• 7.8 Verification of Waiting List Preferences</li> </ul>	<ul style="list-style-type: none"> <li>• Reworded for clarity.</li> </ul>
73.	7.17 Verification of Income	<ul style="list-style-type: none"> <li>• 7.9 Verifications By Types of Income</li> </ul>	<ul style="list-style-type: none"> <li>• Added and revised language regarding verification of the following types of income: employment income, business and self-employment income, Social Security and SSI benefits, unemployment, child support and/or alimony, recurring income, non-recurring income, income from retirement accounts, student financial assistance, and income from excluded sources; and requirements for zero income households.</li> </ul>
74.	7.18 Verification of Assets	<ul style="list-style-type: none"> <li>• 7.10 Income from Assets</li> </ul>	<ul style="list-style-type: none"> <li>• Updated MTW policy that allow for net family assets to be self-certified. Specified the assets are assessed using market/face value.</li> </ul>
75.	7.18.1 Assets Disposed of for Less than Fair Market Value	<ul style="list-style-type: none"> <li>• 7.11.12 Assets worth \$50,000 or more</li> </ul>	<ul style="list-style-type: none"> <li>• Allowed family to self certify assets disposed of at less than fair market value in the 2 years preceding the certification.</li> </ul>

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	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
76.	7.18.2 Savings Account Interest Income and Dividends	<ul style="list-style-type: none"> <li>7.10.1 Savings Account Interest Income and Dividends \$50,000 or more</li> </ul>	<ul style="list-style-type: none"> <li>Added HABC methods to verify interest income: <ul style="list-style-type: none"> <li>Account statements/passbooks</li> <li>Broker's statements</li> <li>IRS Form 1099</li> </ul> </li> </ul>
77.	7.18.3 Retirement Accounts	<ul style="list-style-type: none"> <li>Not in Previous Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Listed written third-party as primary verification method for retirement accounts (before, upon, and after retirement).</li> </ul>
78.	7.18.4 Net Income from Rental Property	<ul style="list-style-type: none"> <li>7.10.3 Net Rental Income from Property Owned by Family</li> </ul>	<ul style="list-style-type: none"> <li>Added HABC policy to require the executed lease, IRS Form 1040 with Schedule E, and a self-certification of expenses as methods to verify income from a rental property.</li> </ul>
79.	7.19.2 Health and Medical Care Expenses	<ul style="list-style-type: none"> <li>7.12.2 Medical Expenses</li> </ul>	<ul style="list-style-type: none"> <li>Updated description of health and medical care expenses and verification criteria.</li> </ul>
80.	7.19.3 Disability Assistance Expenses	<ul style="list-style-type: none"> <li>7.12.3 Assistance to Persons with Disabilities</li> </ul>	<ul style="list-style-type: none"> <li>Reworded verification criteria: <ul style="list-style-type: none"> <li>The family member is a person with disabilities</li> <li>The expense permits a family member to work</li> <li>The expense is not reimbursed</li> </ul> </li> </ul>
81.	7.19.4 Childcare Expenses	<ul style="list-style-type: none"> <li>7.12.1 Childcare Expenses</li> </ul>	<ul style="list-style-type: none"> <li>Reorganized subsection and highlighted eligibility for the deduction. Added HABC verification requirement for pursuing an eligible activity.</li> </ul>
82.	7.19.5 Live-in Aide	<ul style="list-style-type: none"> <li>2.3.9 Live-in Aides</li> </ul>	<ul style="list-style-type: none"> <li>Listed verification criteria to permit a live-in aide: <ul style="list-style-type: none"> <li>Essential to the care of the disabled</li> <li>Not obligated for the support</li> <li>Would not be living in the unit except to provide care.</li> </ul> </li> </ul>
<b>Chapter 8: Determining Income and Rent</b>			
83.	8.2.2 Excluded Income	<ul style="list-style-type: none"> <li>Not Currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added section to group household member type to compare to the excluded income source.</li> <li>Clarified HABC policy concerning asset income.</li> </ul>
84.	8.3.3 Rounding of Income and Deductions	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added HABC policy to round SS and SSI payments when calculating income, and method when applying the Cost of Living Adjustment (COLA).</li> </ul>
85.	8.3.4 Earned Income Disregard (EID)	<ul style="list-style-type: none"> <li>6.5 Earned Income Disregard (EID)</li> </ul>	<ul style="list-style-type: none"> <li>Added statement regarding the discontinuation of the EID (per HUD guidance) and removed all language.</li> </ul>
86.	8.4.1 Wages and Related Compensation	<ul style="list-style-type: none"> <li>6.4.1 Annual Income</li> </ul>	<ul style="list-style-type: none"> <li>Added definition of earned income "income or earnings from wages, tips, salaries, other employee compensation and net income from self-employment"</li> </ul>

Summary of Proposed Changes to the Administrative Plan for 2026

	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
			<ul style="list-style-type: none"> <li>Added definition of day laborer “an individual hired and paid one day at a time without an agreement that the individual will be hired or work again in the future.”</li> <li>Added definition of seasonal worker “an individual who is hired into a short-term position and the employment begins about the same time each year...”</li> </ul>
87.	8.4.2 Self-Employment Income	<ul style="list-style-type: none"> <li>6.4.1 Annual Income</li> </ul>	<ul style="list-style-type: none"> <li>Listed definition of income from a business and methods HABC will use to calculate income.</li> <li>Clarified that income received from an independent contractor is included in annual income.</li> </ul>
88.	8.4.4 Alimony and Child Support	<ul style="list-style-type: none"> <li>6.9 Alimony and Child Support</li> </ul>	<ul style="list-style-type: none"> <li>Specified that HABC will include as annual income only those child support and/or alimony payments that are actually received by the family.</li> </ul>
89.	8.4.5 Public Assistance	<ul style="list-style-type: none"> <li>6.17 Income Changes Resulting from Welfare Program Requirements</li> </ul>	<ul style="list-style-type: none"> <li>Added statement that public assistance payments made to families are included as annual income.</li> </ul>
90.	8.4.7 Retirement Income	<ul style="list-style-type: none"> <li>6.11 Contributions to Retirement Funds</li> </ul>	<ul style="list-style-type: none"> <li>Clarified that income received from any account under a retirement plan is not considered actual income from assets.</li> </ul>
91.	8.4.8 Social Security and SSI	<ul style="list-style-type: none"> <li>Not Currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Clarified HABC is required to calculate annual income using the gross benefit.</li> <li>Explain HABC calculation of COLA for recertifications effective January 1<sup>st</sup>.</li> <li>Explained if there is an SSA overpayment, HABC will use the reduced benefit amount to calculate annual income.</li> </ul>
92.	8.4.9 Nonrecurring Income	<ul style="list-style-type: none"> <li>PIH 2023-27</li> </ul>	<ul style="list-style-type: none"> <li>Added definition of nonrecurring income “Income that has a discrete end date and will not be repeated beyond the coming year during the family’s upcoming regular recertification period will be excluded from a family’s annual income.</li> </ul>
93.	8.4.10 Student Financial Assistance	<ul style="list-style-type: none"> <li>6.4.3 Student Financial Assistance</li> </ul>	<ul style="list-style-type: none"> <li>Relocated subchapter from original location.</li> </ul>
94.	8.4.11 Income for VASH Families	<ul style="list-style-type: none"> <li>HUD VASH</li> </ul>	<ul style="list-style-type: none"> <li>Added HUD guidance for calculating VASH family income for eligibility vs certification: <ul style="list-style-type: none"> <li>HABC will not include VA service-connected disability benefits when determining income eligibility</li> <li>If VASH family reports zero income, HABC must accept a self-certification of zero income.</li> </ul> </li> </ul>
95.	8.5.1 Treatment of Specific Assets	<ul style="list-style-type: none"> <li>6.12 Asset Income</li> </ul>	<ul style="list-style-type: none"> <li>Added guidance for the treatment of certain types of assets, including bank accounts, investment accounts, lump-sums, life-insurance, trusts, and ABLE accounts.</li> </ul>
96.	8.5.2 Jointly Owned Assets	<ul style="list-style-type: none"> <li>Not Currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added HABC policy to count the full value of the asset unless the family can prove the asset is inaccessible. If the family proves they can only access a portion of an asset, the income calculated will be prorated.</li> </ul>
97.	8.6.1 Dependent Deduction	<ul style="list-style-type: none"> <li>6.4.5 Deductions</li> </ul>	<ul style="list-style-type: none"> <li>Relocated definition of dependent.</li> <li>Added HOTMA qualification for adjusting the deduction according to the Consumer Price Index.</li> </ul>

Summary of Proposed Changes to the Administrative Plan for 2026

	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
98.	8.6.2 Elderly or Disabled Family Deduction	<ul style="list-style-type: none"> <li>6.4.5 Deductions</li> </ul>	<ul style="list-style-type: none"> <li>Added current deduction amount.</li> <li>Added HOTMA qualification for adjusting the deduction according to HUD guidance.</li> </ul>
99.	8.6.4 Disability Assistance Expense Deduction	<ul style="list-style-type: none"> <li>6.4.7 Disability Assistance Expense Deduction</li> </ul>	<ul style="list-style-type: none"> <li>Clarified to qualify for the deduction, expenses for attendant care and auxiliary apparatus must allow a family member to work.</li> <li>HABC may review how the work schedule of the relevant family members relates to the hours of care provided.</li> </ul>
100.	8.6.5 Childcare Expense Deduction	<ul style="list-style-type: none"> <li>6.14 Childcare Expenses</li> </ul>	<ul style="list-style-type: none"> <li>Expanded method to calculate the childcare expense deduction.</li> <li>Added HABC policy to cap the childcare expense deduction at the limit published by the Maryland Family Network.</li> <li>Listed eligible and ineligible expenses.</li> </ul>
101.	8.7 Determining Total Tenant Payment (TTP)	<ul style="list-style-type: none"> <li>6.2 Determining Total Tenant Payment (TTP)</li> </ul>	<ul style="list-style-type: none"> <li>Clarified the TTP is not the rent to owner but may be the same amount as the rent to owner in some cases.</li> </ul>
102.	8.8 Utility Allowance	<ul style="list-style-type: none"> <li>6.18 Utility Allowances and Utility Allowance Payments (UAP)</li> </ul>	<ul style="list-style-type: none"> <li>Reorganized and revised language for clarity.</li> </ul>
103.	8.9 Tenant Rent and Subsidy Determination	<ul style="list-style-type: none"> <li>Not in previous Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Provided additional detail regarding calculation of subsidy payment and tenant rent to owner.</li> </ul>
<b>Chapter 9: Housing Quality Standards and Inspections</b>			
104.	9.2 NSPIRE Standards	<ul style="list-style-type: none"> <li>10.2 NSPIRE</li> </ul>	<ul style="list-style-type: none"> <li>Expanded national standards for the physical inspection of real estate</li> <li>Added Affirmative habitability requirements</li> <li>Replaced Guidelines/Types of Inspections with inside/outside requirements</li> </ul>
105.	9.2.3 Life Threatening Deficiencies	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added criteria for inspectable items (for example, Egress deficiency = obstructed means of egress)</li> </ul>
106.	9.2.4 Violation of Space Standards	<ul style="list-style-type: none"> <li>Not Currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Listed NSPIRE space standards violation: <ul style="list-style-type: none"> <li>Units must contain one bedroom or living/sleeping area for every two persons</li> <li>No more than 2 individuals may occupy that area</li> <li>Each habitable room must contain two functional electrical outlets or one and a light fixture</li> <li>Habitable room defined as any space used for living, sleeping, eating, or cooking (excludes bathrooms, closets, hallways, utility spaces, etc.)</li> </ul> </li> </ul>
107.	9.3 Family and Owner Responsibilities	<ul style="list-style-type: none"> <li>10.11 Determination of Responsibility</li> </ul>	<ul style="list-style-type: none"> <li>Listed HABC policy for consequences if family or owner is responsible for HAP contracts signed before or after June 5, 2024 as required by HOTMA.</li> </ul>
108.	9.4.2 Lead-Based Paint	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added HABC's compliance with HUD regulation for inspecting homes at risk of containing lead-based paint</li> </ul>

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	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
			<ul style="list-style-type: none"> <li>Affirmed HABC's intent to follow up if a home contains lead paint.</li> </ul>
109.	MTW Policy	<ul style="list-style-type: none"> <li>10.13.3 Paperwork Reduction Act</li> </ul>	<ul style="list-style-type: none"> <li>Removed MTW policy related to paperwork reduction act of 1995 promoting owner communication through email, phone calls, and text messages.</li> </ul>
110.	9.5.1 Inspection of HABC Owned Units	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added MTW policy that HABC has waived the requirement for independent entities to conduct inspection of HABC owned properties.</li> </ul>
111.	9.5 General Inspection Policies	<ul style="list-style-type: none"> <li>10.5.3 Scheduling Inspections (Biennial or Regular Inspections)</li> </ul>	<ul style="list-style-type: none"> <li>Added HABC policy for scheduling inspections and notification to both the family and the owner</li> <li>Added HABC policy for owner and family inspection attendance (a household member must be present)</li> <li>Continued to allow remote video inspections as authorized in PIH 2020-31.</li> </ul>
112.	9.6.1 Initial Inspection – Reinspection Fees	<ul style="list-style-type: none"> <li>10.5.8 Reinspection Fees</li> </ul>	<ul style="list-style-type: none"> <li>Increased reinspection fee from \$75 to \$100</li> </ul>
113.	9.7.2 Notification of Corrective Actions	<ul style="list-style-type: none"> <li>10.5.4 Inspection Outcomes</li> </ul>	<ul style="list-style-type: none"> <li>Updated to include HABC policy for notification of corrective actions when HAP contracts signed prior to and after June 5, 2024, as required by HOTMA.</li> </ul>
114.	9.8 Enforcing Owner and Family Compliance	<ul style="list-style-type: none"> <li>10.10 &amp; 10.12 Consequences if Owner/Family is Responsible</li> </ul>	<ul style="list-style-type: none"> <li>Used chart format to differentiate HABC policy for termination of the HAP contract if owner is responsible and termination of the voucher if the family is responsible and specify response if HAP contracts signed prior to and after June 5, 2024, as required by HOTMA.</li> </ul>
<b>Chapter 10: Leasing and Reasonable Rent</b>			
115.	10.2 Owner Screening of Prospective Tenants	<ul style="list-style-type: none"> <li>9.9 Information to Owners</li> </ul>	<ul style="list-style-type: none"> <li>Clarified HABC policy that HABC is not responsible for screening family's behavior for tenancy, solely the owner's responsibility.</li> <li>Clarified that HABC will provide owners with the family's current and prior address as shown in HABC records if known</li> </ul>
116.	10.3.1 Tenancy Addendum	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added HUD requirement for tenancy addendum to be added word-for-word to the owner's standard lease.</li> </ul>
117.	10.3.2 Proof of Ownership	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added HABC policy to use Maryland tax assessor's database to confirm ownership.</li> <li>Added HABC policy to only enter into a contract with the legal owner of a qualified unit.</li> </ul>
118.	10.4 Eligible and Ineligible Types of Housing	<ul style="list-style-type: none"> <li>9.3 Eligible and Ineligible Types of Housing</li> </ul>	<ul style="list-style-type: none"> <li>Simplified policy that generally all housing types are acceptable.</li> <li>Added Special Housing Types that are eligible only for VASH families and families requesting a reasonable accommodation.</li> </ul>
119.	10.4.3 Single Room Occupancy	<ul style="list-style-type: none"> <li>19.3 Single Room Occupancy</li> </ul>	<ul style="list-style-type: none"> <li>Relocated Single Room Occupancy subchapter from Special Housing Types chapter to new location.</li> </ul>

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120.	10.5 Lease Review	<ul style="list-style-type: none"> <li>9.4 Lease Review</li> </ul>	<ul style="list-style-type: none"> <li>Provided additional detail including that HABC is not a party to the lease, explanation of “legal capacity”, and provide reasons that HABC would require execution of a new HAP contract.</li> </ul>
121.	10.5.1 RFTA Required Documents	<ul style="list-style-type: none"> <li>9.4.1 Actions before Lease Term and Execution of the HAP</li> </ul>	<ul style="list-style-type: none"> <li>Revised list of documents owners must submit to reflect current HABC process</li> </ul>
122.	10.6 Initial Inspections	<ul style="list-style-type: none"> <li>9.6 Initial Inspections</li> </ul>	<ul style="list-style-type: none"> <li>Expanded bullet to certify the unit must meet habitable conditions to accompany link to Inspections chapter.</li> </ul>
123.	10.6.1 Unit Size	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Updated for consistency with NSPIRE regulations for unit size.</li> </ul>
124.	10.8 Contract Execution Process	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added sections with additional detail on requirements for: HAP Contract Payments, Owner Certification of Compliance, Termination of HAP Contracts and Payments, and Breach of HAP contract</li> </ul>
125.	10.9.1 Reasonable Rent and HABC Owned Units	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added HUD-approved waiver to use an independent entity to conduct rent determinations.</li> </ul>
126.	10.11 Request for Rent Adjustments	<ul style="list-style-type: none"> <li>11.7 Request for Rent Adjustments</li> </ul>	<ul style="list-style-type: none"> <li>Added proposed MTW Activity to limit owner rent reviews if a rent increase is denied.</li> </ul>
127.	10.12.1 Landlord Leasing Incentives	<ul style="list-style-type: none"> <li>11.8 Landlord Leasing Incentives</li> </ul>	<ul style="list-style-type: none"> <li>Removed \$500 one-time incentive for substantially rehabilitated units.</li> </ul>
<b>Chapter 11: Owner Policies</b>			
128.	11.2 Basic Owner Responsibilities	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added list of owner responsibilities under the HAP contract.</li> </ul>
129.	11.2.2 Non-Discrimination	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added federal regulation that owner may not discriminate against a person covered under a protected class.</li> </ul>
130.	11.6 Foreclosure	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added HABC policy related to foreclosures.</li> </ul>
<b>Chapter 12: Moves with Continued Assistance</b>			
131.	12.2 Allowable Moves	<ul style="list-style-type: none"> <li>13.2 Allowable Moves</li> </ul>	<ul style="list-style-type: none"> <li>Reorganized section for clarity.</li> </ul>
132.	12.4 Moves Procedures	<ul style="list-style-type: none"> <li>13.4 Procedure for Moves</li> </ul>	<ul style="list-style-type: none"> <li>Reorganized section for clarity.</li> </ul>
133.	12.5 Housing Assistance Payments	<ul style="list-style-type: none"> <li>13.4.3 Time of Contract Change</li> </ul>	<ul style="list-style-type: none"> <li>Clarified policy that the HAP to owner in the month the family moves and a new lease does not constitute a duplicative subsidy.</li> </ul>

Summary of Proposed Changes to the Administrative Plan for 2026

	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
134.	12.5.1 Automatic Termination of HAP	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added if a zero HAP family requests to move, a HAP contract will only be executed if the family is eligible for a subsidy payment with the new unit.</li> </ul>
135.	12.6 Required Moves for Health and Safety Reasons	<ul style="list-style-type: none"> <li>PIH 2023-27</li> </ul>	<ul style="list-style-type: none"> <li>Added: <ul style="list-style-type: none"> <li><i>“HABC will issue a family whose HAP contract is being terminated due to an owner failing to make the required repairs within the required time frame, a voucher no later than 30 days prior to the termination of the HAP contract. No briefing is required for these families.”</i></li> </ul> </li> <li>Added if the voucher will expire within 30 days HABC will offer a PBV or RAD PBV unit of appropriate size if available. If there are no available PBV or RAD PBV units, HABC will offer an appropriate sized public housing unit if available.</li> <li>If the family does not vacate the unit upon expiration of the voucher, the family is no longer assisted in the HCV program and an informal hearing is not required.</li> </ul>
<b>Chapter 13: Portability</b>			
136.	13.1 Introduction	<ul style="list-style-type: none"> <li>13.5 Portability</li> </ul>	<ul style="list-style-type: none"> <li>Updated the introduction to clarify where port-outs are concerned, HABC is the initial PHA and where port-ins are concerned, HABC is the receiving PHA</li> <li>Affirmed the receiving PHA has two options, to administer or absorb the incoming family.</li> </ul>
137.	13.2.1 Receiving PHA Role	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added subsection to explain the responsibilities of the Receiving PHA</li> <li>The family’s unit size is determined in accordance with the subsidy standards of the receiving PHA.</li> <li>The family’s HAP is determined in the same manner as for other families in the receiving PHA’s jurisdiction.</li> </ul>
138.	13.2.2 Applicant Families	<ul style="list-style-type: none"> <li>13.5.2 Determining HCV Program Eligibility for Applicant Families</li> </ul>	<ul style="list-style-type: none"> <li>Clarified that families may port out immediately upon issuance of their voucher.</li> </ul>
139.	13.2.4 Reexamination of Household Income and Composition at Port-Out	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Clarified that a new reexamination of family income and composition is not required but HABC will conduct a full reexam if the family’s regular reexamination is due within 120 days of the date of request to port out.</li> </ul>
140.	13.2.5 Briefing	<ul style="list-style-type: none"> <li>13.5.4 Port-Out Voucher Issuance</li> </ul>	<ul style="list-style-type: none"> <li>Clarified the family will receive the same briefing with benefits of moving to other jurisdictions.</li> <li>HABC will provide the PHA contact information to the jurisdiction the family wishes to move.</li> <li>HABC will select the PHA if there are more than one in the jurisdiction and the family declines to chose.</li> </ul>
141.	13.2.6 Voucher Issuance, Term, and Suspensions	<ul style="list-style-type: none"> <li>13.5.4 Port-Out Voucher Issuance</li> </ul>	<ul style="list-style-type: none"> <li>Mirrored HABC voucher issuance policy allowing an initial term of 120 days.</li> <li>Allow HABC the flexibility to extend the voucher if the voucher will expire before the family is issued a voucher by the receiving PHA, if the family decides to return to HABC’s jurisdiction to find a unit, or if the family decides to search for a unit in a third jurisdiction.</li> </ul>

Summary of Proposed Changes to the Administrative Plan for 2026

	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
142.	13.2.7 Contact with the Receiving PHA	<ul style="list-style-type: none"> <li>13.5.3 Determining HCV Program Eligibility for Participant Families</li> </ul>	<ul style="list-style-type: none"> <li>Documented HABC policy to contact the receiving PHA to determine if the agency will bill or absorb the voucher.</li> <li>HABC will advise the family to contact the receiving PHA too.</li> </ul>
143.	13.2.8 Sending Documentation to the Receiving PHA	<ul style="list-style-type: none"> <li>13.5.8 Requests for Tenancy Approval</li> </ul>	<ul style="list-style-type: none"> <li>Listed the documents HABC will send to the receiving PHA and additional/optional documents HABC may supply.</li> </ul>
144.	13.2.9 Initial Billing Deadline	<ul style="list-style-type: none"> <li>13.5.11 Billing Procedures</li> </ul>	<ul style="list-style-type: none"> <li>Listed authorization for HABC to decline billing if the initial billing notice is received more than 90 days from the expiration date of HABC's voucher.</li> </ul>
145.	13.2.10 Monthly Billing Payments	<ul style="list-style-type: none"> <li>13.5.11 Billing Procedures</li> </ul>	<ul style="list-style-type: none"> <li>Added: <i>"HABC will promptly reimburse the receiving PHA for the lesser of 80% of the ongoing administrative fee or 100% of the receiving PHA's administrative fee."</i></li> </ul>
146.	13.2.11 Change in Billing Amount	<ul style="list-style-type: none"> <li>13.5.11 Billing Procedures</li> </ul>	<ul style="list-style-type: none"> <li>Added requirement for the receiving PHA to notify HABC of any changes in the billing amount using the HUD-52665.</li> <li>The change must be received not later than 10 business days following the effective date of the change in amount.</li> </ul>
147.	13.2.12 Reexaminations for Administered Port-Outs	<ul style="list-style-type: none"> <li>13.5.4 Port-Out Voucher Issuance</li> </ul>	<ul style="list-style-type: none"> <li>Listed policy that the receiving PHA must send HABC a copy of the 50058 after each regular reexamination within 10 business days of the reexamination effective date.</li> <li>HABC may seek absorption if the voucher if the form is received late.</li> </ul>
148.	13.2.13 Denial or Termination of Assistance	<ul style="list-style-type: none"> <li>13.5.5 Incoming Portability (Port-Ins)</li> </ul>	<ul style="list-style-type: none"> <li>Added if HABC has grounds for denying or terminating assistance for a portable family that has not been absorbed by the receiving PHA, HABC may act on those grounds at any time.</li> </ul>
149.	13.2.14 Subsequent Household Moves	<ul style="list-style-type: none"> <li>13.5.6 Restrictions on Portability</li> </ul>	<ul style="list-style-type: none"> <li>Added if the family decides to move out of the receiving PHA's jurisdiction, HABC will issue the family a voucher to move and will send the HUD-52665 and supporting documents to the new receiving PHA.</li> </ul>
150.	13.3.1 Receiving PHA's Role	<ul style="list-style-type: none"> <li>13.5.5 Incoming Portability (Port-Ins)</li> </ul>	<ul style="list-style-type: none"> <li>Reiterated the responsibility of the receiving PHA to administer or absorb the incoming family.</li> </ul>
151.	13.3.2 Responding to the Initial PHA's Request	<ul style="list-style-type: none"> <li>13.5.5 Incoming Portability (Port-Ins)</li> </ul>	<ul style="list-style-type: none"> <li>Added HABC will promptly notify the initial PHA if it will be administering or absorbing the voucher and will not reverse its decision at a later date without the consent of the initial PHA.</li> </ul>
152.	13.3.3 Initial Contact with Family	<ul style="list-style-type: none"> <li>13.5.5 Incoming Portability (Port-Ins)</li> </ul>	<ul style="list-style-type: none"> <li>Added when a family moves into HABC's jurisdiction, HABC is responsible for promptly contacting the family and explaining HABC's procedures for incoming portable families.</li> <li>If the voucher issued to the family by the initial PHA has expired, HABC will not process the family's paperwork and will refer the family back to the initial PHA.</li> <li>If HABC refuses to provide assistance, the family will be referred back to the initial PHA rather than offered an informal hearing.</li> </ul>
153.	13.3.4 File Documentation and Verification	<ul style="list-style-type: none"> <li>13.5.10 Required Documents</li> </ul>	<ul style="list-style-type: none"> <li>Listed the documents HABC expects from an initial PHA when a family requests to port.</li> <li>HABC has the right to have the family sign new forms if they are not provided or are illegible.</li> </ul>



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	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
154.	13.3.1 Criminal Background Checks	<ul style="list-style-type: none"> <li>13.5.5 Incoming Portability (Port-Ins)</li> </ul>	<ul style="list-style-type: none"> <li>Added HABC policy to conduct a criminal background check and sex offender registry check for all family members ages 14+ who are porting into HABC's jurisdiction.</li> </ul>
155.	13.3.2 Briefing	<ul style="list-style-type: none"> <li>13.5.5 Incoming Portability (Port-Ins)</li> </ul>	<ul style="list-style-type: none"> <li>Added discretionary option to offer port-in families briefings</li> </ul>
156.	13.3.3 Income Eligibility and Reexamination	<ul style="list-style-type: none"> <li>13.5.9 Regular Program Functions</li> </ul>	<ul style="list-style-type: none"> <li>Added HABC policy that a new reexamination not required but may be completed if necessary.</li> <li>HABC will not delay approving a unit to complete a full examination.</li> </ul>
157.	13.3.4 Voucher	<ul style="list-style-type: none"> <li>13.5.4 Port-Out Voucher Issuance</li> </ul>	<ul style="list-style-type: none"> <li>Listed HABC policy to issue the voucher within 10 business days of receipt of paperwork.</li> <li>HABC will not issue a voucher with a term at least 30 days later than the initial PHA</li> <li>If the initial billing will be delayed, HABC may be required to absorb the voucher.</li> </ul>
158.	13.3.5 Notifying the Initial PHA	<ul style="list-style-type: none"> <li>13.5.9 Regular Program Functions</li> </ul>	<ul style="list-style-type: none"> <li>Added HABC responsibility to promptly notify the initial PHA if the family has leased an eligible unit and will send HUD-52665.</li> <li>If the family decides not to lease in HABC's jurisdiction, they will be referred back to the initial PHA.</li> </ul>
159.	13.3.6 Administering the Voucher	<ul style="list-style-type: none"> <li>13.5.9 Regular Program Functions</li> </ul>	<ul style="list-style-type: none"> <li>Added additional detail regarding administration of the voucher and related requirements.</li> </ul>
160.	13.3.7 Absorbing the Voucher	<ul style="list-style-type: none"> <li>13.5.11 Billing Procedures</li> </ul>	<ul style="list-style-type: none"> <li>Added additional detail regarding absorption of vouchers and related requirements.</li> </ul>
<b>Chapter 14: Reexaminations</b>			
161.	14.2 Regular Reexaminations	<ul style="list-style-type: none"> <li>12.2 Reexaminations</li> </ul>	<ul style="list-style-type: none"> <li>Removed reference to a six-month pilot program to test online reexaminations as reexaminations are regularly completed online.</li> <li>Removed policy to review criminal history for all members who are 14 years of age and older at each recertification.</li> </ul>
162.	14.2.2 Online Reexamination Process	<ul style="list-style-type: none"> <li>12.2.7 Online Reexamination Process</li> </ul>	<ul style="list-style-type: none"> <li>Removed reference to pilot program for online reexaminations.</li> </ul>
163.	14.2.12 Application of Subsidy Standards at Regular Reexaminations	<ul style="list-style-type: none"> <li>12.2.10 Application of Payment Standards at Regular Reexaminations</li> </ul>	<ul style="list-style-type: none"> <li>Clarified an updated payment standard will be applied at the family's first regular reexamination following the change in family unit size.</li> </ul>
164.	14.2.13 Application of Utility Allowances at Regular Reexaminations	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Revised section to state HABC will apply updated utility allowances at the first regular reexamination after the allowance is adopted.</li> </ul>
165.	14.3 Interim Reexaminations	<ul style="list-style-type: none"> <li>12.3 Interim Reexaminations</li> </ul>	<ul style="list-style-type: none"> <li>Removed MTW policy limiting voluntary interims</li> <li>Removed hardship policy associated with MTW activity</li> </ul>

Summary of Proposed Changes to the Administrative Plan for 2026

	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
166.	14.3.1 Interims Prompted by Changes in Income	<ul style="list-style-type: none"> <li>12.3.2 Interims Prompted by Changes in Income</li> </ul>	<ul style="list-style-type: none"> <li>Added new policy that zero income individuals must report increases in income between regular reexaminations</li> </ul>
167.	14.3.2 Interims Prompted by Moves within the Jurisdiction	<ul style="list-style-type: none"> <li>12.3.3 Interims Prompted by Moves</li> </ul>	<ul style="list-style-type: none"> <li>Restated policy to clarify a move interim is not required but may be requested by the family.</li> </ul>
168.	14.3.3 Interims Prompted by Changes in Household Composition	<ul style="list-style-type: none"> <li>12.3.4 Interims Prompted by Family Composition</li> </ul>	<ul style="list-style-type: none"> <li>Added statement that HABC will conduct background screening and verification procedures as listed in Applicant Screening for all members added to the voucher.</li> </ul>
169.	14.3.5 Interims Prompted by Zero Income Household Status	<ul style="list-style-type: none"> <li>12.3.6 Interim Prompted by Zero Income Status</li> </ul>	<ul style="list-style-type: none"> <li>Clarified that households who only report SNAP benefits are still considered zero income households and are required to report increases in income.</li> </ul>
170.	14.3.7 Application of Payment Standards at Interim Reexaminations	<ul style="list-style-type: none"> <li>12.3.8 Application of Payment Standards and Utility Allowances for Interim Reexaminations</li> </ul>	<ul style="list-style-type: none"> <li>Added approved MTW policy language:  <i>“When there is a contract rent increase between regular recertifications, HABC will update the payment standard at the interim recertification only if the payment standard has increased. HABC does not decrease payment standards for occupied units. Additionally, HABC will update payment standards at the time of a move and at the next regular reexamination, regardless of the number of months following the effective date of the payment standard amount.”</i> </li> </ul>
171.	14.3.8 Application of Subsidy Standards at Interim Reexaminations	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added “HABC will not update the subsidy standards at interim reexamination. The updated voucher size will be effective at the next regular reexamination following the change.</li> </ul>
172.	14.6.2 Changes Not Reported Timely	<ul style="list-style-type: none"> <li>12.6.3 Procedures When the Change Not Reported Timely</li> </ul>	<ul style="list-style-type: none"> <li>Removed language discussing retroactive rent decreases when changes not reported timely. HABC will not backdate a change when not reported timely so caveat not needed.</li> </ul>
173.	14.9.4 Income of Persons Permanently Living in a Nursing Home	<ul style="list-style-type: none"> <li>12.7 Changes in Voucher Size as a Result of Household Changes</li> </ul>	<ul style="list-style-type: none"> <li>Clarified that HABC will request verification from a medical professional that a member is confined on a permanent basis and the family may request they not be considered a family member.</li> </ul>
<b>Chapter 15: Denial of Assistance and Informal Reviews</b>			
174.	Chapter 15: Denial of Assistance and Informal Reviews	<ul style="list-style-type: none"> <li>Chapter 15: Denial or Termination of Assistance</li> </ul>	<ul style="list-style-type: none"> <li>Original chapter titled Denial or Termination of Assistance; separated process for applicants and participants and grouped with informal reviews.</li> <li>Reorganized subsections within the chapter.</li> </ul>

Summary of Proposed Changes to the Administrative Plan for 2026

	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
175.	15.2.2 Prohibited Reasons for Denial of Program Assistance	<ul style="list-style-type: none"> <li>15.3.2 Administration</li> </ul>	<ul style="list-style-type: none"> <li>Relocated HUD policies prohibiting denial of program assistance based on protected criteria such as age, disability, race, where the family lives, etc.</li> </ul>
176.	15.3.1 EIV Screening	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added subsection that details HABC's use of the HUD EIV system for tenant and debt screening.</li> <li>Applicants/Participants may request a copy of the report but must make disputes within 3 years from the end of participation date.</li> <li>If an applicant commits fraud, the applicant is prohibited from future rental assistance for up to 10 years.</li> <li>Included Maryland statute to prohibit state collections beyond 3 years.</li> </ul>
177.	15.3.2 Criminal Background Screening	<ul style="list-style-type: none"> <li>15.3.3 Screening of Applicants for Criminal Activity</li> </ul>	<ul style="list-style-type: none"> <li>Clarified HABC policy to conduct background screenings on all household members including live-in aides.</li> <li>Added HUD requirement to allow family the opportunity to dispute the accuracy and relevance of a criminal record before denying assistance.</li> </ul>
178.	15.3.3 Sex Offender Screening	<ul style="list-style-type: none"> <li>15.5.3 Denial of Assistance for Sex Offenders</li> </ul>	<ul style="list-style-type: none"> <li>Added HABC policy to deny assistance to an applicant required to register as a sex offender for a lifetime and that HABC will terminate assistance if a household member is wrongly admitted to the program.</li> </ul>
179.	15.3.2 Criminal Background Screening 15.3.4 Actions Based on Past or Current Behavior	<ul style="list-style-type: none"> <li>15.3 Screening and Termination for Drug Abuse and Other Criminal Activity</li> </ul>	<ul style="list-style-type: none"> <li>Reformatted to include mandatory reasons, non-mandatory reasons HABC will still deny assistance, and any methods HABC will use to substantiate claims.</li> </ul>
180.	15.3.5 Duplicative Subsidy	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added guidance for what is considered a duplicative subsidy</li> </ul>
181.	15.3.6 VASH Screening	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added screening criteria limits for VASH applicants</li> </ul>
182.	15.3.9 Mitigating Factors	<ul style="list-style-type: none"> <li>15.5.1 Standard for Violation</li> </ul>	<ul style="list-style-type: none"> <li>Reformatted subsection to broadly allow HABC discretion to accept mitigating factors when deciding to deny assistance.</li> </ul>
183.	15.3.10 Criteria for Deciding to Deny Assistance	<ul style="list-style-type: none"> <li>15.5.1 Standard for Violation</li> </ul>	<ul style="list-style-type: none"> <li>Reformatted subsection to provide HABC definitions for evidence required (preponderance of the evidence), consideration of circumstances (all relevant information), and confidentiality of criminal records (limited access).</li> </ul>
184.	15.3.11 Reasonable Accommodation	<ul style="list-style-type: none"> <li>18.6 Mitigating Circumstances for those with Disabilities</li> </ul>	<ul style="list-style-type: none"> <li>Relocated and reiterated HABC's commitment to ensuring equal program access and links to Fair Housing chapter.</li> </ul>
185.	15.3.12 Protections for VAWA Victims	<ul style="list-style-type: none"> <li>18.6.1 Protections under VAWA</li> </ul>	<ul style="list-style-type: none"> <li>Expanded VAWA protections and required victim/perpetrator documentation.</li> </ul>

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	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
186.	15.4 Informal Reviews – Applicants	<ul style="list-style-type: none"> <li>18.3 Applicant Denials and Informal Reviews</li> </ul>	<ul style="list-style-type: none"> <li>Relocated entire subsection.</li> </ul>
187.	15.4.2 Informal Review Process	<ul style="list-style-type: none"> <li>18.3.1 Procedure for Informal Reviews</li> </ul>	<ul style="list-style-type: none"> <li>Expanded on the HABC process and procedures for informal reviews</li> <li>Explained the hearing officer’s role and how the hearing is conducted</li> </ul>
188.	15.2 Procedures for Non-Citizens	<ul style="list-style-type: none"> <li>18.5 Hearing and Appeal Provisions for Non-Citizens</li> </ul>	<ul style="list-style-type: none"> <li>Relocated and simplified HABC policy for informal hearings if assistance is denied for citizenship eligibility.</li> </ul>
<b>Chapter 16: Termination of Assistance and Informal Hearings</b>			
189.	Chapter 16: Termination of Assistance and Informal Hearings	<ul style="list-style-type: none"> <li>Chapter 15: Denial or Termination of Assistance</li> </ul>	<ul style="list-style-type: none"> <li>Original chapter titled Denial or Termination of Assistance; separated process for applicants and participants and grouped with informal hearings.</li> </ul>
190.	16.3 Mandatory Termination of Assistance	<ul style="list-style-type: none"> <li>15.2.2 Mandatory Denial and Termination</li> </ul>	<ul style="list-style-type: none"> <li>Reorganized subsections and added examples within the chapter and made new subchapter headers for easier locating of offenses.</li> <li>Linked HUD definitions for controlled substance and violent criminal activity with subsection rather than separate.</li> </ul>
191.	16.3.3 Eviction	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added new definition of eviction “A family will be considered evicted if the family moves after a legal eviction order has been issued, whether or not physical enforcement of the order was necessary.”</li> <li>Allowed some discretion by HABC e.g. if a failure to pay rent judgment was made based on an incorrect rent share.</li> <li>Defined serious and repeated lease violations.</li> </ul>
192.	16.4 Other Authorized Reasons for Termination of Assistance	<ul style="list-style-type: none"> <li>15.2.3 Grounds for Denial or Termination of Assistance</li> </ul>	<ul style="list-style-type: none"> <li>Reorganized subsections and added examples within and made new subchapter headers for easier locating of offenses.</li> </ul>
193.	16.5 Criteria for Deciding to Terminate Assistance	<ul style="list-style-type: none"> <li>15.5.1 Standard for Violation</li> </ul>	<ul style="list-style-type: none"> <li>Reformatted subsection to provide HABC definitions for evidence required (preponderance of the evidence), consideration of circumstances (all relevant information), confidentiality of criminal records (limited access), and Household Definitions (such as guests).</li> </ul>
194.	16.7 Termination of Tenancy by the Owner	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added HUD guidance related to the owner terminating the family’s tenancy and lease requirements.</li> <li>Explained other good cause (failure of family to accept a new lease, owner’s desire to move back into the unit, business or economic reason).</li> </ul>
195.	16.8 Family Obligations	<ul style="list-style-type: none"> <li>15.7 Family Obligations</li> </ul>	<ul style="list-style-type: none"> <li>Added that the family must pay utility bills and maintain appliances they are responsible for</li> <li>Added definition of subleasing.</li> <li>Specified that damages to the unit beyond normal wear and tear may be deducted from the security deposit.</li> <li>Added stipulation that HABC will not attempt to collect a MD debt older than 3 years.</li> </ul>

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	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
			<ul style="list-style-type: none"> <li>Added definition of family break-up.</li> </ul>
196.	16.10 Informal Hearings	<ul style="list-style-type: none"> <li>18.4 Participant Termination and Informal Hearings</li> </ul>	<ul style="list-style-type: none"> <li>Relocated entire subchapter.</li> <li>Expanded on the HABC process and procedures for informal hearings.</li> <li>Explained the hearing officer's role and how the hearing is conducted.</li> </ul>
197.	16.11 Hearing and Appeal Provisions for Restrictions on Assistance to Non Citizens	<ul style="list-style-type: none"> <li>18.5 Hearing and Appeal Provisions for Non-Citizens</li> </ul>	<ul style="list-style-type: none"> <li>Relocated and clarified HABC policy for informal hearings if assistance is denied for citizenship eligibility.</li> </ul>
198.	16.12 Participants with Disabilities	<ul style="list-style-type: none"> <li>18.6 Mitigating Circumstances for those with Disabilities</li> </ul>	<ul style="list-style-type: none"> <li>Relocated and reiterated HABC's commitment to ensuring equal program access and links to Fair Housing chapter.</li> </ul>
199.	16.3 Protections Under the VAWA	<ul style="list-style-type: none"> <li>18.6.1 Protections under VAWA</li> </ul>	<ul style="list-style-type: none"> <li>Expanded VAWA protections and required victim/perpetrator documentation.</li> </ul>
<b>Chapter 17: Owner and Family Debts</b>			
200.	17.3.1 Prohibited Owner Actions	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added section specifying prohibited owner actions such as: (1) making false statements, (2) committing fraud or offering bribes, and (3) charging the family additional rent or security deposit.</li> </ul>
201.	17.4 Family Debts to HABC	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added section defining family debt and HABC's response to misrepresentation</li> <li>Included prohibited family actions such as: (1) paying rent beyond HABC listed amount, (2) intentional misreporting, and (3) offering bribes.</li> </ul>
202.	17.9 Guidelines for Repayment Agreements	<ul style="list-style-type: none"> <li>17.6 Guidelines for Payment Agreements</li> </ul>	<ul style="list-style-type: none"> <li>Added statement that <i>"HABC may allow a repayment agreement that exceeds \$2,500 or allow a repayment timeframe up to 36 months at the written approval of the Senior Vice President or designee."</i></li> <li>Added statement that <i>"All repayment agreements must be in writing, dated, and signed by both the family (head of household and co-head if applicable) and an HABC representative."</i></li> </ul>
<b>Chapter 18: Program Integrity and Monitoring</b>			
203.	18.1 Introduction	<ul style="list-style-type: none"> <li>22.1 Introduction</li> <li>23.1 Introduction</li> </ul>	<ul style="list-style-type: none"> <li>Merged Chapter 22: Monitoring, Recordkeeping and Reporting with Chapter 23: Program Integrity Addendum. Merged introductions.</li> </ul>
204.	18.2 Criteria for Investigation of Suspected Abuse and Fraud	<ul style="list-style-type: none"> <li>23.2 Criteria for Investigation of Suspected Abuse and Fraud</li> </ul>	<ul style="list-style-type: none"> <li>Added: <i>"For purposes of this chapter, the term error refers to an unintentional error or omission. Program abuse or fraud refers to a single act or pattern of actions that constitute a false statement, omission, or concealment of a substantial fact, made with the intent to deceive or mislead."</i></li> </ul>

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	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
205.	18.4 Steps HABC will take to Detect Program Abuse	<ul style="list-style-type: none"> <li>23.3 Steps HABC will Take to Prevent Program Abuse</li> </ul>	<ul style="list-style-type: none"> <li>Added: <i>"HABC will investigate when inconsistent or contradictory information is detected."</i></li> <li>Added Independent Audits and HUD Monitoring as possible reasons for investigation.</li> </ul>
206.	18.5 HABC Handling of Allegations of Possible Abuse and Fraud	<ul style="list-style-type: none"> <li>23.5 HABC Handling of Allegations of Possible Abuse and Fraud</li> </ul>	<ul style="list-style-type: none"> <li>Added examples of complaints HABC will investigate such as: (1) unreported income, (2) fraud, (3) failure to report a change, and (4) unauthorized occupancy.</li> </ul>
207.	18.9 Conclusion of HABC's Investigative Review	<ul style="list-style-type: none"> <li>23.9 Conclusion of HABC's Investigative Review</li> </ul>	<ul style="list-style-type: none"> <li>Added: <i>"HABC will base its evaluation on a preponderance of the evidence collected during its investigation."</i></li> </ul>
208.	18.10.1 Applicant/Participant Penalties for Program Abuse	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added: <i>"HABC will inform the family in writing of its findings and remedies within 10 business days of the conclusion of the investigation. The notice will include a description of the error or program abuse, the basis on which HABC determined the error or program abuse, the remedies to be employed, and the family's right to appeal the results through the informal review or hearing process if applicable."</i></li> </ul>
209.	18.11 HABC Caused Errors or Program Abuse	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added introduction to describe HABC errors.</li> </ul>
210.	18.13 MTW Monitoring	<ul style="list-style-type: none"> <li>22.2 MTW Monitoring</li> </ul>	<ul style="list-style-type: none"> <li>Updated references from HQS to NSPIRE.</li> </ul>
211.	18.15 Record Keeping and Other Data	<ul style="list-style-type: none"> <li>22.4 Record Keeping and Other Data</li> </ul>	<ul style="list-style-type: none"> <li>Reorganized list into columns for easier viewing.</li> </ul>
<b>Chapter 19: Project-Based Voucher &amp; Rental Assistance Demonstration Programs</b>			
212.	19.1 Introduction	<ul style="list-style-type: none"> <li>20.1 Introduction</li> </ul>	<ul style="list-style-type: none"> <li>Rewrote chapter in its entirety to include additional detail and requirements, including updated HOTMA requirements. Included MTW and RAD-specific policies.</li> </ul>
213.	19.2 MTW PBV Policies	<ul style="list-style-type: none"> <li>20.8 Moving to Work Policies in the PBV</li> </ul>	<ul style="list-style-type: none"> <li>Added reference to a proposed MTW waiver to expand the waiver of Independent Entity requirements. Upon HUD approval, HABC will waive the Independent Entity requirement for the project selection process, review of evidence of rehabilitation, and determination of substantial improvement, in addition to the requirements already approved..</li> </ul>
214.	19.3 Rental Assistance Demonstration (RAD) Program	<ul style="list-style-type: none"> <li>20.15 Rental Assistance Demonstration PBV</li> </ul>	<ul style="list-style-type: none"> <li>Expanded definition and added key RAD provisions.</li> <li>Highlighted policies that differ for RAD vs. non-RAD PBV and referenced throughout chapter.</li> </ul>
215.	19.4.6 Set-Aside Vouchers for Families with Disabilities	<ul style="list-style-type: none"> <li>4.9 Set-Aside of Vouchers for Families with Disabilities</li> </ul>	<ul style="list-style-type: none"> <li>Relocated subsection.</li> <li>Expanded on Funding and Incentives.</li> </ul>
216.	19.5 Proposal and Project Selection	<ul style="list-style-type: none"> <li>20.4 Proposal Selection Process</li> </ul>	<ul style="list-style-type: none"> <li>Reorganized subsection to clarify general procedures for submission and selection, methods of competitive selection, exceptions, and pre-selection requirements.</li> </ul>

Summary of Proposed Changes to the Administrative Plan for 2026

	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
			<ul style="list-style-type: none"> <li>Reformatted site selection standards in reader-friendly chart.</li> </ul>
217.	19.6 Environmental Review	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added subsection explaining the environmental review process.</li> </ul>
218.	19.7 Dwelling Units	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added housing quality standards for PBV housing.</li> <li>Included lead-based paint requirements.</li> <li>Included guidance for accessibility features.</li> <li>Added policy for newly constructed and rehabilitated projects.</li> </ul>
219.	19.8 Rehabilitated and Newly Constructed Units	<ul style="list-style-type: none"> <li>20.6.2 New Construction Site and Neighborhood Standard</li> </ul>	<ul style="list-style-type: none"> <li>Expanded regulations for development activity for newly constructed and rehabilitated housing projects.</li> <li>Added RAD subsidy layering review requirements.</li> <li>Added other requirements and evidence of completion/acceptance of completed units.</li> </ul>
220.	19.9 Housing Assistance Payments Contract	<ul style="list-style-type: none"> <li>20.15.12 Execution and Effective Date of HAP</li> </ul>	<ul style="list-style-type: none"> <li>Added additional guidance to explain the contents of the PBV HAP contract, differences in RAD policy, the use of floating units (PBV and RAD), stipulations for modifications, and extensions.</li> </ul>
221.	19.10 Selection of PBV Program Participants	<ul style="list-style-type: none"> <li>20.10 Offer of PBV Assistance</li> </ul>	<ul style="list-style-type: none"> <li>Expanded subsection to provide guidance to lease families in place.</li> <li>Added guidance for organizing the waiting list (PBV and RAD)</li> <li>Updated and clarified PBV waiting list preferences: <ul style="list-style-type: none"> <li>Current HABC PBV participants transferring due to VAWA or reasonable accommodation</li> <li>Current TBV who wish to relinquish voucher</li> <li>Current PBV participants who are over/under housed</li> <li>All other applicants on waiting list.</li> </ul> </li> <li>Listed HABC policy for screening and prohibition of rescreening for converted households.</li> </ul>
222.	19.11 Leasing of PBV Units	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Listed HABC policy for leasing PBV units, described owner expectations for filling vacancies, described lease execution, defined family occupancy requirements.</li> </ul>
223.	19.12 Occupancy	<ul style="list-style-type: none"> <li>Not currently in Admin Plan (20.11 Occupancy)</li> </ul>	<ul style="list-style-type: none"> <li>Expanded section to include HABC policy related to the lease and any changes, authority for the owner to terminate tenancy, payment of the HAP, and security deposit expectations.</li> </ul>
224.	19.13 Moves	<ul style="list-style-type: none"> <li>20.11.1 Overcrowded, under-occupied, and Accessible Units</li> </ul>	<ul style="list-style-type: none"> <li>Listed HABC policy for moving overhoused/underhoused families.</li> <li>Listed policies on family right to move.</li> <li>Turnover cap for RAD limits voucher issuance to no more than three-quarters of its turnover vouchers.</li> <li>Listed guidance for emergency transfers under VAWA</li> </ul>
225.	19.14 Rent to Owner	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added new subsection to explain the initial rent calculation (included determining rent for tax credit units).</li> <li>Stated HABC policy for redetermining rent and methods for rent increases.</li> </ul>

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	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
226.	19.15 Termination or Expiration of the PBV HAP Contract	<ul style="list-style-type: none"> <li>20.15.3 Lease Termination and Grievance Hearings</li> </ul>	<ul style="list-style-type: none"> <li>Expanded subsection to specify reasons HABC may terminate the HAP contract or when owner may decide not to extend the HAP.</li> </ul>
227.	19.16 Additional Miscellaneous RAD Provisions	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added subsection to detail HABC policy for utility allowances, phase-in of tenant rent increases, informal reviews/hearings for RAD participants, and Public Housing FSS and ROSS participants.</li> </ul>
<b>Chapter 20: Special Purpose Vouchers</b>			
228.	Chapter 20: Special Purpose Voucher Programs	<ul style="list-style-type: none"> <li>Not Currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Newly created chapter to provide guidance for the following special purpose vouchers: <ul style="list-style-type: none"> <li>Family Unification Program (FUP)</li> <li>Veterans Affairs Supportive Housing (VASH)</li> <li>Mainstream</li> <li>Nonn-Elderly Disabled</li> <li>Emergency Housing Vouchers (EHV)</li> </ul> </li> </ul>
229.	20.2 Family Unification Program (FUP)	<ul style="list-style-type: none"> <li>4.16 Special HUD Funding for FUP</li> </ul>	<ul style="list-style-type: none"> <li>Expanded section to document HABC policy related to the FUP program. Added eligibility criteria, voucher issuance guidance, lease up, and termination of assistance.</li> </ul>
230.	20.3 Veterans Affairs Supportive Housing	<ul style="list-style-type: none"> <li>4.14 Special HUD Funding for VASH</li> </ul>	<ul style="list-style-type: none"> <li>Expanded section to document HABC policy related to screening, eligibility, voucher issuance, leasing, and termination of assistance.</li> </ul>
231.	20.4 Mainstream	<ul style="list-style-type: none"> <li>4.17 Special HUD Funding for Mainstream</li> </ul>	<ul style="list-style-type: none"> <li>Expanded section to document HABC policy related to Mainstream voucher eligibility, briefing, voucher issuance, and portability.</li> </ul>
232.	20.5 Non-Elderly Disabled (NED) Category II Vouchers	<ul style="list-style-type: none"> <li>4.15 Special HUD Funding for NEDs Category II Vouchers</li> </ul>	<ul style="list-style-type: none"> <li>Expanded section to document NED Category II eligibility and procedure for turnover vouchers.</li> </ul>
233.	20.6 Emergency Housing Vouchers (EHV)	<ul style="list-style-type: none"> <li>4.18 Special HUD Funding for Emergency Housing Vouchers</li> </ul>	<ul style="list-style-type: none"> <li>Relocated section and expanded to list HABC policy for termination of assistance due to lack of continued program funding.</li> </ul>
<b>Chapter 21: Moderate Rehabilitation &amp; Moderate Rehabilitation Single Room Occupancy</b>			
234.	Chapter 21: MOD Rehab & MOD Rehab SRO	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Newly created chapter to list policy for administration of MOD Rehab and MOD Rehab SRO voucher – a non-MTW program.</li> <li>Chapter follows HUD regulations and includes guidance for eligibility, voucher issuance, leasing, and termination from the program</li> </ul>
<b>Chapter 23: Homeownership</b>			



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	Section Name and Subject Area	Existing Admin Plan	Proposed Admin Plan
235.	23.1 Introduction	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Created Homeownership chapter and added introduction referencing the HCV Homeownership program and the MTW Special Homeownership program.</li> </ul>
236.	23.2 Homeownership Program	<ul style="list-style-type: none"> <li>19.8 Homeownership</li> </ul>	<ul style="list-style-type: none"> <li>Added MTW policy that lists the goals of the MTW Homeownership program and references additional features.</li> </ul>
237.	23.3 Eligibility Requirements	<ul style="list-style-type: none"> <li>19.8.1 Eligibility Requirements</li> </ul>	<ul style="list-style-type: none"> <li>Added eligibility criteria for HCV Homeownership (HCV voucher holders), Special Homeownership (Public Housing residents, PBV voucher tenants, and PH and HCV applicants on either waiting list), and Section 32 (HCV, SHV, PBV, and Public Housing residents).</li> </ul>
238.	23.5 Homeownership Counseling Requirements	<ul style="list-style-type: none"> <li>19.8.4 Homeownership Counseling Requirements</li> </ul>	<ul style="list-style-type: none"> <li>Added MTW policy that participants are required to enroll and complete the Homebuyer Readiness Training program to receive any homeownership assistance.</li> </ul>
239.	23.7 Eligible Properties and Feasibility	<ul style="list-style-type: none"> <li>19.8.5 Eligible units</li> </ul>	<ul style="list-style-type: none"> <li>Added subsection with MTW policy that allows HABC scattered site properties as eligible.</li> <li>Added MTW policy that limits the scope of repairs and renovation of units disposed of directly by HABC to eligible purchasers to \$75,000 per unit.</li> </ul>
240.	23.9 HABC Search and Purchase Requirements	<ul style="list-style-type: none"> <li>19.8.7 HABC Search and Purchase Requirements</li> </ul>	<ul style="list-style-type: none"> <li>Added phrase “Not incur additional debt by using credit cards to pay for services related to the purchasing of a property” as a family requirement.</li> </ul>
241.	23.10 Inspection and Contract	<ul style="list-style-type: none"> <li>19.8.8 Inspection and Contract</li> </ul>	<ul style="list-style-type: none"> <li>Added termite inspection as required inspection.</li> </ul>
242.	23.11 Financing	<ul style="list-style-type: none"> <li>19.8.9 Financing</li> </ul>	<ul style="list-style-type: none"> <li>Added subsection listing MTW policy related to second mortgage assistance <ul style="list-style-type: none"> <li>Subject to availability HABC may offer 2<sup>nd</sup> mortgage up to 50% after first mortgage commitment received for at least 75% of the sales price.</li> </ul> </li> <li>Added subsection for MTW policy related to Down Payment or Closing Cost Assistance (Section 23 program) <ul style="list-style-type: none"> <li>HABC may offer up to \$10,000 in assistance for families who attend homeownership counseling and select a property in Baltimore city or county.</li> <li>Participants of the HCV Homeownership and Special Homeownership program are not eligible.</li> </ul> </li> <li>Added subsection for MTW policy related to HABC buyer match (Section 23 program) <ul style="list-style-type: none"> <li>HABC may match a buyer’s personal contribution towards the purchase of a scattered site property up to \$5,000</li> <li>Participants of the HCV Homeownership and Special Homeownership program are not eligible.</li> </ul> </li> </ul>
243.	23.12.3 Decelerated Assistance for Homeownership Program Participants	<ul style="list-style-type: none"> <li>19.8.11.3 Decelerated Assistance for Homeownership Program Participants</li> </ul>	<ul style="list-style-type: none"> <li>Reworded section to clarify HABC will offer eligible participants a 15-year original participation term and an additional 5 years of decelerated assistance.</li> <li>Added “Families enrolled in the Deceleration Assistance Program are not eligible for HABC’s continued assistance beyond the 5 years”</li> </ul>

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			<ul style="list-style-type: none"> <li>Added “Decelerated assistance is available to participants with HCV Homeownership and Special Homeownership Vouchers.</li> </ul>
244.	23.13 Recapture Provisions and Deed Restrictions	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added MTW policy that for properties owned and sold by HABC, HABC requires portions of the appreciation during the first 10 years after sale as follows: <ul style="list-style-type: none"> <li>First 5 years – 50% of appreciation</li> <li>Years 6-10 – 25% of appreciation</li> <li>Years 11+ - No recapture of appreciation</li> </ul> </li> </ul>
245.	23.14 Purchase and Resale Entities	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<ul style="list-style-type: none"> <li>Added MTW policy that allows for disposition of vacant scattered sites to purchase and resale entities with the following requirements: <ul style="list-style-type: none"> <li>Resales must be to residents of conventional public housing</li> <li>HABC will market the program and refer eligible residents to the PRE</li> <li>Eligible residents will pay a non-refundable property reservation fee of up to \$1,000</li> </ul> </li> </ul>
246.	23.32 Reinstatement	<ul style="list-style-type: none"> <li>19.8.29 Reinstatement</li> </ul>	<ul style="list-style-type: none"> <li>Clarified MTW policy that to be eligible for reinstatement the family must not have refinanced with a HELOC or withdrawn equity from the home beyond the amount necessary to cover the expense of needed non-cosmetic repairs.</li> </ul>
247.	23.39 MTW Special Homeownership Vouchers	<ul style="list-style-type: none"> <li>Not currently in Admin Plan</li> </ul>	<p>Added the following approved MTW Activities:</p> <ul style="list-style-type: none"> <li>Waiting List – a waiting list for the special homeownership vouchers will be established for families on the public housing and HCV waiting list</li> <li>Eligibility – lists households eligible for the special homeownership vouchers</li> <li>Eligible Units – lists units eligible for SHVs</li> <li>Portability and Moves – HABC prohibits ports for SHV assistance</li> <li>HAP – SHV participants must pay at least 30% of adjusted household income towards monthly mortgage payments.</li> <li>Rent/Mortgage Burden – HABC has established a rent burden for 40% for some households and 35% for others</li> <li>Term of Homeownership Assistance – ability for elderly or disabled families to move with continued homeownership assistance</li> <li>Payment Shock Requirements – require a family’s initial portion of mortgage payment to not be more than 1½ times their current TTP</li> <li>Reinstatement – policy to reinstate a family who’s assistance was terminated less than 6 months prior.</li> <li>SHV Hardship Policy – not applicable for SHV Program Participants.</li> </ul>