HOUSING AUTHORITIES
CITY OF EUREKA & COUNTY OF HUMBOLDT

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AGENDA

HOUSING AUTHORITY OF THE COUNTY OF HUMBOLDT
BOARD OF COMMISSIONERS REGULAR MEETING

Monday September 14, 2026, 12:00pm

LOCATION
Housing Authority of the County of Humboldt, 735 W. Everding Street, Eureka CA 95503

Portions of this meeting may be conducted by teleconferencing in accordance with Government Code Section 54953(b). Teleconference locations are as follows: 735 W. Everding St., Eureka California. The location is accessible to the public, and members of the public may address the Housing Authority of the County of Humboldt Board of Commissioners from any teleconference location.

PUBLIC PARTICIPATION
Public access to this meeting is available in person at the above location.

Persons wishing to address the Board of Commissioners are asked to submit comments for the public speaking portion of the agenda as follows:

- Send an email with your comment(s) to HR@eurekahumboldtha.org prior to the Board of Commissioners meeting; or
- Call and leave a message at (707) 443-4583 ext. 219; or
- Request to speak during Public Comment (agenda item 2), subject to applicable time limits.

When addressing the Board on agenda items or business introduced by Commissioners, members of the public may speak for a maximum of five minutes per agenda item when the subject is before the Board.

1. Roll Call

2. Public Comment (Non-Agenda):
   This time is reserved for members of the public to address the Committee relating to matters of the Housing Authority of the County of Humboldt not on the agenda. No action may be taken on non-agenda items unless authorized by law. Comments will be limited to five minutes per person and twenty minutes in total.

Pages

3. Approve Minutes of the Board of Commissioners
   3-5 a. Regular meeting held August 10, 2026

4. Bills and Communications: none

5. Report of the Secretary:

The Report of the Secretary is intended to brief the Commission on items, issues, key dates, etc., that do not require specific action and are not separate items on the Board of Commissioner's Agenda.

6 5a. Occupancy and Leasing Report

7-9 5b. Voucher Programs Utilization Reports

6. Reports of the Commissioners:

This time is reserved for Commissioners to share any relevant news or housing related endeavors undertaken by Commissioners.

7. Unfinished Business: None.

8. New Business:

10-53 8a. Resolution 527 - 2027 Administrative Plan

Recommended Board Action; *Accept and Adopt for Approval*

54-75 8b. Resolution 528 - 2027 PHA Plan and Goals

Recommended Board Action; *Accept and Adopt for Approval*

9. Closed Session (if needed).

10. Adjournment

Note: The next regularly scheduled board meeting is Tuesday, October 13, 2026 at noon.

Note

Documents related to this agenda are available on-line at:
https://eurekahumboldtha.org/governance/

Know Your RIGHTS Under The Ralph M. Brown Act: Government's duty is to serve the public, reaching its decisions in full view of the public. The Board of Commissioners exists to conduct the business of its constituents. Deliberations are conducted before the people and are open for the people's review.

MINUTES

MEETING OF THE HOUSING AUTHORITY OF THE COUNTY OF HUMBOLDT BOARD OF COMMISSIONERS

Monday, August 10, 2026

Vice-Chairperson Fitzgerald declared a quorum present and called the meeting to order at 12:01 p.m. Note that due to Chairperson Conner's remote attendance, the meeting was lead by Vice-Chairperson Fitzgerald.

Motion for Chairperson Conner to participate by phone, made by Commissioner Leon.
Second - Vice-Chairperson Fitzgerald.
All Approve.

1. Roll Call

Present:	Chairperson Conner (Via phone)
	Vice Chairperson Fitzgerald
	Commissioner Leon
	Commissioner Zondervan-Droz
	Commissioner Derooy
	Commissioner Durchslag
	Commissioner Escarda
Absent:	None
Staff:	Churchill
	Wiesner
	Viernes-Olson

2. Public Comment (Non-Agenda): None heard.

3. Approve minutes of the board of commissioners regular meeting held May 11, 2026, and the adjourned meeting for July 13, 2026

Motion to approve the minutes of the regular meeting held May 11, 2026, and the adjourned meeting for July 13, 2026, made by Commissioner Derooy.

Second – Commissioner Leon.

Roll call:

Ayes:	Conner, Fitzgerald, Leon, Zondervan-Droz, DeRooy, Durchslag, Escarda
Nays:	None
Abstain:	None
Absent:	None

Vice-Chairperson Fitzgerald declared the motion carried to approve the minutes of May 11, 2026, and the adjourned meeting for July 13, 2026.

4. Bills and Communications:

4a. Humboldt SEMAP FY2025 – Kudos were given for a positive notice.

4b. HUD - VASH Award letter – Total VASH vouchers available now up to 100.

5. Report of the Secretary:

5a. Occupancy and Leasing Report
Secretary Churchill briefs the board on this report.

5b. HCV Utilization Reports
Secretary Churchill briefs the board on this report.

6. Reports of the Commissioners:

a. Commissioner Zondervan – Droz commented on the Landlords Luncheon held on August 5th. She noted that in speaking with the landlords, they stated that it has been very easy and wonderful to work with the staff. Kudos to the staff!

b. Chairperson Durchslag updated the Board on SoHum. Next round of funding is being requested and secured. Development of various areas in Garberville and Redway continue to move forward.

7. Unfinished Business:

None.

8. New Business:

8a. DRAFT 2027 PHA Plan and Goals – *provide input*

Biggest thing to note is one new goal added to put together a list of other subsidized housing programs in the area.

A Corrective Action Plan was also added.

8b. DRAFT 2027 Administrative Plan Changes – *informational*

Update includes recommended preference for those with the EHV. They will have higher priority on new vouchers.

8c. Resolution 526, 2025 County Financial Audit

Recommended Board Action: *Accept and Adopt for Approval*

RESOLUTION 526

TO ACCEPT AGENCY AUDIT REPORTS FOR FISCAL YEAR ENDING DECEMBER 31, 2025

WHEREAS, It is a requirement of the United States Department of Housing and Urban Development that the Housing Authority have an independent audit of Compliance and

Internal Control Over Financial Reporting based on Audit of Financial Statements Performed in Accordance with Government Audit Standards; and

WHEREAS, It is a requirement of the United States Department of Housing and Urban Development that the Housing Authority have an independent audit of Compliance with Requirements Applicable to Each Major Program and on Internal Control Over Compliance In Accordance with OMB Circular A-133; and

WHEREAS, The Housing Authority has contracted with Smith Marion & Co. LLP, Certified Public Accountants, to complete the audit; and

WHEREAS, The Annual Audit has been completed and the Auditors Report has been submitted to the members of the Board of Commissioners for review and approval; and

WHEREAS, The Commissioners have reviewed the audit report and found it to be substantially correct.

NOW, THEREFORE, BE IT RESOLVED, that the Commissioners of the Housing Authority of the County of Humboldt do hereby accept the Audited Financial Statements for the fiscal year ending December 31, 2025.

Motion to approve Resolution 526 made by Chairperson Conner.
Second – Commissioner Leon

Ayes:	Conner, Fitzgerald, Leon, Zondervan-Droz, DeRooy, Durchslag, Escarda
Nays:	None
Abstain:	None
Absent:	None

Vice-Chairperson Fitzgerald declared the motion carried and Resolution 526 approved.

9. Closed Session: None needed.

10. Adjournment

There being no further business to come before the Commissioners, the meeting was adjourned at 12:53 p.m.

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Chairperson Secretary

Occupancy and Leasing Report
Jul-26

Program	Total Units Available	Jan-26	Feb-26	Mar-26	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26	Wait List End of Month	
HOUSING AUTHORITY OF THE CITY OF EUREKA															
Public Housing	195	187	185	186	185	183	183	179						1026	1
Eureka Family Housing	51	49	48	47	47	49	49	49						1031	
Eureka Senior Housing	22	22	21	21	21	22	22	22						212	
Total City Units	**268**	**258**	**254**	**254**	**253**	**254**	**254**	**250**	**0**	**0**	**0**	**0**	**0**		
HOUSING AUTHORITY OF THE COUNTY OF HUMBOLDT															
Vouchers - Program Allocation vs. Utilization															
Housing Choice Vouchers	1234	890	882	877	872	870	862	855						1618	Waitlist Closed 3/28/25
VASH Vouchers	95	88	86	87	89	88	91	88						N/A	
Mainstream vouchers	75	71	71	69	70	69	70	73						N/A	2
Emergency Housing Vouchers (EHV)	182	102	99	96	97	96	96	95						N/A	3
FYI Foster Youth to Independence (2026)	3	0	0	0	0	0	0	0						N/A	9
Total All Vouchers	**1589**	**1151**	**1138**	**1129**	**1128**	**1123**	**1119**	**1111**	**0**	**0**	**0**	**0**	**0**		
Project Based Vouchers *(note that these are a subset of HCV & VASH voucher counts shown above)*															
PBV-VASH - Bayview Heights (Eureka)	22	22	20	20	21	20	20	22						N/A	4
PBV-HCV - Bayview Heights (Eureka)	3	2	2	2	2	2	3	2						1	4
PBV-HCV - Sorrell Place (Arcata)	5	5	5	5	5	5	5	5						370	5
PBV-HCV - Providence (Eureka)	42	37	37	37	37	37	38	35						N/A	6
PBV-HCV - Laurel Canyon (Eureka)	35	35	34	34	35	35	35	34						180	7
PBV-HCV - Key Me Ek (Eureka)	13	13	13	13	12	12	12	12						N/A	8
PBV-HCV - The Mallard (Eureka)	**													N/A	10
Total Project Based Vouchers	**120**	**114**	**111**	**111**	**112**	**111**	**113**	**110**	**0**	**0**	**0**	**0**	**0**		

Vouchers issued but not under contract, end of month (aka "Searching")	1

Note: Occupancy / utilization numbers shown are as of the first day of the month.

1. Total PH units is 198; 3 units are exempted for EPD use, Boys & Girls Club, and Maintenance use, and are unavailable for tenant rental.
   HACE is starting a plan of held vacancies in the 25-1/Prospect Street units to facilitate rehabilitation plans in later 2026.

2. Mainstream vouchers were awarded December 2020. Funding and voucher issuance began April 2021.
   25 Mainstream vouchers will be allocated via waitlist pulls; 50 will be via referral from CoC partners.
   Mainstream applicants share waitlist with HCV applicants.

3. No PHA waitlist for EHVs; all are issued based on referral from HHHC or HDVS. Referrals began Q4 2021; no new vouchers after 9/30/2023.

4. Bayview Heights - 25 PBVs for veterans at 4th & C Street, Eureka; contract signed 6/30/2020. 3 vouchers reserved for non-VASH prioritized clients, pulled from waitlist.

5. Sorrell Place - 5 PBV units for extremely low income households; 7th & I Street, Arcata; contract signed 6/1/2022.

6. Providence Mother Bernard House - 42 PBV units based on referral from CoC; contract signed 1/8/2024.

7. Laurel Canyon (7th & Myrtle Ave.) - 35 senior PBV units; contract signed 12/7/2023.

8. Key-Me-Ek - 13 PBV units based on referral from CoC; contract signed 11/1/2024.

9. FYI Vouchers (Foster Youth to Independence) - DHHS and HACH entered an MOU in 2025 to request and administer FYI vouchers.
   Up to 25 vouchers can be requested per year; first 3 vouchers requested in 2025 and funded Q1-2026.

**10. The Mallard (Linc Housing) - 25 PBVs will assist extremely low income households at three locations in Eureka; lease-up expected Q3-Q4 2026

HOUSING AUTHORITY OF THE COUNTY OF HUMBOLDT
All Voucher Programs
For the month of July 2026

		January	February	March	April	May	June	July	Total
	Traditional HCV & VASH (Includes PBVs and FYI)								
A	HAP income (budget authority)	$ 785,634	$ 785,634	$ 785,634	$ 776,869	$ 777,659	$ 766,658	$ 764,742	$ 5,442,828
	HAP expenses	(775,054)	(770,614)	(765,780)	(766,750)	(760,158)	(747,846)	(743,230)	(5,329,432)
	Surplus (Deficit)	10,580	15,020	19,854	10,119	17,501	18,812	21,512	113,396
B	% Total income utiliized	98.65%	98.09%	97.47%	98.70%	97.75%	97.55%	97.19%	97.92%
	Administrative/Other Income	115,892	100,837	100,774	107,311	96,871	109,568	1,889	633,140
	Operating expenses	(95,725)	(86,361)	(92,929)	(88,874)	(84,162)	(98,151)	(184,998)	(731,201)
	Surplus (Deficit)	20,167	14,476	7,845	18,437	12,709	11,417	(183,110)	(98,060)
	Remaining HAP Cash	10,950	8,580	18,528	22,560	115,592	129,904	126,876	
E	Remaining Non-HAP Cash	1,011,428	1,012,302	1,020,956	1,070,413	1,046,493	1,061,251	932,627	
	Total HCV Cash	1,022,378	1,020,882	1,039,484	1,092,973	1,162,085	1,191,155	1,059,503	
	Cash Increase/(Decrease)	25,270	(1,496)	18,602	53,489	69,111	29,070	(131,652)	
	# of Households Assisted	978	968	964	961	958	953	944	6,726
	New Vouchers Searching at End of Month	6	4	6	5	6	1	2	
	Average HAP Payment	$ 792	$ 796	$ 794	$ 798	$ 793	$ 785	$ 787	$ 792
	Mainstream (disabled & non-elderly)								
A	HAP income (budget authority)	$ 56,829	$ 56,829	$ 51,816	$ 59,275	$ 58,485	$ 58,923	$ 60,838	$ 402,995
	HAP expenses	(58,287)	(58,339)	(56,274)	(58,503)	(57,169)	(57,477)	(59,127)	(405,176)
	Surplus (Deficit)	(1,458)	(1,510)	(4,458)	772	1,316	1,446	1,711	(2,181)
B	% Total income utiliized	102.57%	102.66%	108.60%	98.70%	97.75%	97.55%	97.19%	100.54%
	Administrative/Other Income	6,653	6,648	6,655	17,718	6,923	100	140	44,837
	Operating expenses	(5,718)	(5,601)	(6,470)	(5,999)	(7,617)	(6,589)	(12,200)	(50,193)
	Surplus (Deficit)	935	1,048	185	11,719	(694)	(6,489)	(12,060)	(5,355)
D	Remaining HAP Cash	1,374	(12,200)	1,734	29	29	11,950	10,155	
	Remaining Non-HAP Cash	75,538	76,355	55,553	68,506	58,118	51,345	44,666	
	Total MSV Cash	76,912	64,155	57,287	68,535	58,147	63,295	54,821	
	Cash Increase/(Decrease)	1,371	(12,758)	(6,868)	11,248	(10,388)	5,148	(8,474)	
	New Vouchers Searching at End of Month	-	-	4	-	-	-	-	
	# of Households Assisted	71	71	69	70	69	70	73	493
	Average HAP Payment	$ 821	$ 822	$ 816	$ 836	$ 829	$ 821	$ 810	$ 822
	Emergency Housing Vouchers (EHVs)								
	HAP income (budget authority)	$ 112,044	$ 112,044	$ 112,044	$ 112,044	$ 112,044	$ 112,044	$ 112,044	$ 784,307
	HAP expenses	(95,006)	(91,038)	(90,200)	(89,967)	(89,197)	(88,876)	(86,923)	(631,207)
	Surplus (Deficit)	17,038	21,006	21,844	22,077	22,847	23,168	25,121	153,100
C	% Total income utiliized	84.79%	81.25%	80.50%	80.30%	79.61%	79.32%	77.58%	80.48%
	Administrative/Other Income	13,288	13,238	12,166	12,256	12,169	9,120	9,114	81,350
	Operating expenses	(9,379)	(9,607)	(10,673)	(10,232)	(12,369)	(10,942)	(18,885)	(82,088)
	Surplus (Deficit)	3,908	3,630	1,494	2,024	(200)	(1,822)	(9,772)	(737)
	Remaining HAP Cash	19,084	19,719	28,256	30,157	38,390	11,946	53	
	Remaining Non-HAP Cash	153,757	172,019	174,073	175,398	174,803	173,340	164,330	
	Total EHV Cash	172,840	191,738	202,329	205,554	213,193	185,286	164,383	
	Cash Increase/(Decrease)	14,086	18,898	10,590	3,226	7,639	(27,907)	(20,903)	
	New Vouchers Searching at End of Month	-	-	-	-	-	-	-	
	# of Households Assisted	102	99	96	97	96	96	95	681
	Average HAP Payment	$ 931	$ 920	$ 940	$ 927	$ 929	$ 926	$ 915	$ 927

HOUSING AUTHORITY OF THE COUNTY OF HUMBOLDT
All Voucher Programs
For the month of July 2026

		January	February	March	April	May	June	July	Total
	Total All Voucher Programs								
A	HAP income (budget authority)	$ 954,507	$ 954,507	$ 949,494	$ 948,188	$ 948,188	$ 937,624	$ 937,624	$ 6,630,131
	HAP expenses	(928,347)	(919,991)	(912,254)	(915,220)	(906,524)	(894,199)	(889,280)	(6,365,815)
	Surplus (Deficit)	26,160	34,516	37,240	32,968	41,664	43,425	48,344	264,316
B	% Total income utilized	97.26%	96.38%	96.08%	96.52%	95.61%	95.37%	94.84%	96.01%
	Administrative/Other Income	135,833	120,722	119,595	137,285	115,962	118,788	11,142	759,328
	Operating expenses	(110,822)	(101,569)	(110,071)	(105,105)	(104,148)	(115,683)	(216,084)	(863,481)
	Surplus (Deficit)	25,011	19,153	9,524	32,180	11,815	3,106	(204,941)	(104,153)
	Remaining HAP Cash	31,407	16,099	48,518	52,746	154,010	153,800	137,083	
	Remaining Non-HAP Cash	1,240,724	1,260,676	1,250,582	1,314,317	1,279,414	1,285,936	1,141,624	
	Total Program Cash	1,272,131	1,276,775	1,299,099	1,367,062	1,433,424	1,439,736	1,278,707	
	Cash Increase/(Decrease)	40,728	4,644	22,324	67,963	66,362	6,312	(161,029)	
	# of Households Assisted	1,151	1,138	1,129	1,128	1,123	1,119	1,112	7,900
	New Vouchers Searching at end of month	6	4	10	5	6	1	2	
	Average HAP Payment	$ 807	$ 808	$ 808	$ 811	$ 807	$ 799	$ 800	$ 806

Notes

A Includes 3 FYI vouchers issued.

B HCV and MSV voucher issuance on hold. Expecting spending to be near, or below 100% until future issuance can resume. Special purpose HCV VASH and FYI voucehrs can still be issued.

C No longer issuing EHV vouchers. Budget authority extends through 2026, with any remaining reserves funding vouchers through sunset of program.

D HAP cash on hand is minimal, but HAP advances are available through HUD. Restriced cash position may go "negative" while waiting for HUD advance HAP deposits and is temporarily funded with excess unrestricted funds.

HUD Held Reserves estimated as of 07/31/2026
HCV - $54,812
MSV - $0
EHV - $863,185
*Reserves will be utilized to fund budget authority for remaining EHV program months.

E Beginning 04/2026, Includes Local Area Investment Fund balance to represent full, unrestricted cash balance.

Housing Choice Vouchers	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
January	918	903	882	866	884	866	843	877	1005	978
February	919	898	894	867	875	858	844	926	1002	968
March	918	896	897	861	875	862	844	934	1005	964
April	919	908	895	859	873	858	844	934	1013	961
May	917	905	895	850	873	861	838	947	1009	958
June	914	898	892	853	868	864	841	954	1004	953
July	919	895	882	873	865	856	849	973	999	944
August	917	888	879	872	864	854	847	976	992	
September	913	888	872	883	864	851	846	984	989	
October	906	888	866	888	862	846	844	985	989	
November	903	887	881	890	866	839	839	992	988	
December	902	882	877	887	857	842	838	1003	983	
Average	**914**	**895**	**884**	**871**	**869**	**855**	**843**	**957**	**998**	**961**
UML's	10,965	10,736	10,612	10,449	10,426	10,257	10,117	11,485	11,978	6,726

Mainstream Vouchers					2021	2022	2023	2024	2025	2026
January						27	43	51	55	71
February						27	45	53	59	71
March						28	48	54	64	69
April						29	50	54	68	70
May						31	50	55	69	69
June						32	51	55	71	70
July						36	52	54	71	73
August					4	37	53	55	71	
September					15	36	50	55	70	
October					18	37	51	57	69	
November					24	38	50	58	70	
December					27	39	51	56	70	
Average					**21**	**33**	**50**	**55**	**67**	**70**
UML's					88	397	594	657	807	493

Emergency Housing Vouchers					2021	2022	2023	2024	2025	2026
January						5	86	145	128	102
February						11	100	146	124	99
March						15	102	144	123	96
April						18	108	143	118	97
May						23	111	142	116	96
June						30	114	141	112	96
July						38	127	142	111	95
August						42	127	143	112	
September						46	137	144	109	
October						64	135	142	109	
November						69	141	135	109	
December					4	80	147	131	106	
Average					**4**	**37**	**120**	**142**	**115**	**97**
UML's					4	441	1435	1698	1377	681

Total All Voucher Programs	2017	2018	2019	2020	2021	2022	2023	2024	2025	2025
January	918	903	882	866	884	898	972	1073	1188	1151
February	919	898	894	867	875	896	989	1125	1185	1138
March	918	896	897	861	875	905	994	1132	1192	1129
April	919	908	895	859	873	905	1002	1131	1199	1128
May	917	905	895	850	873	915	999	1144	1194	1123
June	914	898	892	853	868	926	1006	1150	1187	1119
July	919	895	882	873	865	930	1028	1169	1181	1112
August	917	888	879	872	868	933	1027	1174	1175	
September	913	888	872	883	879	933	1033	1183	1168	
October	906	888	866	888	880	947	1030	1184	1167	
November	903	887	881	890	890	946	1030	1185	1167	
December	902	882	877	887	888	961	1036	1190	1159	
Average	**914**	**895**	**884**	**871**	**894**	**925**	**1,012**	**1,153**	**1,180**	**1,129**
UML's	10,965	10,736	10,612	10,449	10,518	11,095	12,146	13,840	14,162	7,900

Housing Authority of the County of Humboldt

Board of Commissioners Meeting

September 14, 2026

Agenda Item 8a

Memorandum

To: Commissioners
From: Cheryl Churchill, Executive Director
Subject: Update to Administrative Plan: Housing Opportunity Through Modernization Act (HOTMA)

BACKGROUND AND HISTORY:
Following the signing of HOTMA in 2016, which amended the US Housing Act of 1936, HUD released a proposed rule in September 2019 and a final rule in February 2023 that addressed Section 102 and Section 104 of HOTMA.

The HUD HOTMA (Housing Opportunity Through Modernization Act) update significantly changes how income and assets are calculated for individuals applying for or participating in HUD housing programs like Section 8 vouchers and public housing, primarily by increasing asset limits, streamlining income verification processes, and raising deductions for certain demographics like the elderly and disabled, with the goal of making it easier for low-income households to qualify for assistance while still maintaining program integrity; key changes include increased asset thresholds for self-certification, adjusted deductions for dependents, and a higher threshold for imputing income from assets.

Full Administrative Plan is available on the Agency Website: https://eurekahumboldtha.org/wp-content/uploads/2026/07/AdminPlan_CA086_2026-07_DRAFT.pdf

FINANCIAL IMPACT:
None noted.

IMPACT TO PERSONNEL:
Staff attended several training courses throughout 2026 to learn about HOTMA changes. In-house departmental trainings as well as professional webinar trainings will continue as needed.

STAFF RECOMMENDATION:
Accept and adopt for approval

Administrative Plan Update 09/2026

Summary of Changes: Administrative Plan for the Housing Choice Voucher Program

Chapter	Topic	Description
3	3-I.K. Foster Children and Foster Adults	Language Added: Foster children or adults are permitted to live in an assisted unit with the PHA's permission. A PHA refusal to allow a family to have a foster child or foster children may constitute a violation of the familial status provisions of the Fair Housing Act. The income of foster children/adults is not counted in family annual income, and foster children/adults do not qualify for a dependent deduction [24 CFR 5.603; HUD-50058 IB, p. 13].
	3-I.L. Absent Family Members; Family Members Permanently Confined for Medical Reasons	Language Added: PHA Policy An individual confined to a nursing home or hospital on a permanent basis is not considered a family member.
	3-II.B. Citizenship or Eligible Immigration Status; Ineligible Noncitizens	Language Added: When reviewing applicants for assistance, if a PHA formally makes a finding of fact or conclusion of law, supported by a determination from the Department of Homeland Security (DHS) or the Executive Office of Immigration Review (e.g., a Final Order of Deportation), that an individual is not lawfully present in the United States, then the PHA must provide to DHS a report of the person's name, address, and other identifying information that the PHA has. Note that a SAVE response of no service record or verification of an immigration status that makes the individual ineligible for housing assistance is not a finding of fact or conclusion of law that the individual is not lawfully present. At least four times annually, PHAs must provide such information to DHS. If a PHA has knowledge of an individual who is not lawfully present in the United States, they must provide a report to DHS within 45 days after the close of the appropriate calendar year quarter [HUD Secretary Letter 12/16/25].
	3-II.D. Family Consent to Release of Information	Language Added: The PHA must deny admission to the program if any member of the applicant family fails to sign and submit the consent forms for obtaining information in accordance with 24 CFR 5, Subparts B and F [24 CFR 982.552(b)(3) and 24 CFR 5.232(a)].

4	4-II.B. Organization of the Waiting List	Language Added: The PHA will maintain separate, development-specific waiting lists for PBV projects.
	4-III.C. Selection Method; Local Preferences	Language Added: 3. The PHA will offer a preference to Public Housing families who are being displaced due to Repositioning activities undertaken by the Housing Authority of the City of Eureka, when no Public Housing units are readily or reasonably available to transfer households that would be displaced, and no tenant protection vouchers are available when needed to support the tenant's relocation.
	4-III.E. The Eligibility Determination Process	Language Updated: PHA Policy Interviews will be conducted in English. For applicants who may require language assistance, the PHA will encourage families to bring an advocate, family member, friend, or other adult representative to assist in communications. The PHA will also utilize available resources such as bilingual staff, community volunteer resources, responsible use of artificial intelligence technology, and/or machine translation to assist families with communication.
5	5-I.B. Briefing; Briefing Packet	Language Added: PHA Policy The PHA will provide the following additional materials in the briefing packet: • The grounds on which the PHA may terminate assistance for a participant family because of family action or failure to act • Requirements for notifying the PHA of any changes in income or family composition • Information on how to fill out and file a housing discrimination complaint form
	5-II.B. Determining Family Unit Size	Language Added: PHA Policy A foster child or foster adult may be allowed to reside in the unit if their presence would not result in overcrowding of the existing unit. If the authorized placement agency (e.g., public child welfare agency) requires that the foster child have a separate bedroom, the PHA will provide the subsidy standard for one additional bedroom.
6	6-III.D. Health and Medical Care Expenses Deduction	Language Added: Before placing health, medical, or disability expense bills and documentation in the tenant file, the PHA will redact all personally identifiable information.

6		If the PHA receives documentation from a verification source that contains the individual's specific diagnosis, information regarding the individual's treatment, and/or information regarding the nature or severity of the person's disability, the PHA will immediately dispose of this confidential information; this information will never be maintained in the individual's file. If the information needs to be disposed of, the PHA will note in the individual's file that verification was received, the date received, and the name and address of the person/organization that provided the verification. Under no circumstances will the PHA include an applicant's or resident's medical records in the file [Notice PIH 2010-26].
	6-III.E. Disability Assistance Expenses Deduction; Eligible Auxiliary Apparatus	New Policy: PHA Policy Expenses incurred for maintaining or repairing an auxiliary apparatus are eligible. In the case of an apparatus that is specially adapted to accommodate a person with disabilities (e.g., a vehicle or computer), the cost to maintain the special adaptations (but not maintenance of the apparatus itself) is an eligible expense. The cost of service animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.
	6-IV.C. Applying Payment Standards; Changes in Family Unit Size (Voucher Size)	Language Updated: PHA Policy If the family unit size (voucher size) changes during the term of a HAP contract, and it is a decrease in voucher size, the new family unit size will be used to determine the payment standard at the family's first regular reexamination following the change in family unit size. If the family unit size (voucher size) changes during the term of a HAP contract, and it is an increase in voucher size, the new family unit size will be used to do an interim certification as soon as the PHA is made aware of the change.
7	7-I.A. Family Consent to Release of Information; Consent Forms	New Policy: PHA Policy At admission, the PHA will request that all adult family members (other than the head of household) sign consent forms stating that their EIV income information may be shared with the head of household. Adult family members with no such consent form on file will be requested to sign at annual reexamination. If an adult family member other than the head of household fails to sign a consent form stating that their EIV income information may be shared with the head of household, the

7		PHA will utilize EIV's "Print Household Member Information" feature to generate income reports addressed separately to each adult in the household. For example, if a household has two adults, the PHA will provide one report to the head of household and a separate report to the other adult member. Refusal by an adult family member to sign a form granting permission to provide EIV information to the head of household is not grounds for denial or termination of assistance of either the individual or the family. The executed form will remain effective until the family is denied assistance, the individual leaves the program, or the family member provides written notification to the PHA to revoke consent.
	7-I.B. Use of Other Programs' Income Determinations	Language Updated: PHA Policy The PHA will not accept verification from other federal assistance programs, aside from other Housing Authorities. For example, the income calculated for a housing authority's LIHTC unit will be accepted as verification for voucher programs. All income will be verified in accordance with the requirements of HUD's verification hierarchy and PHA policies in this chapter.
	7-I.C. Streamlined Income Determinations	Language Updated: PHA Policy The PHA will neither use a Safe Harbor income determination from a federal assistance program nor streamline the annual reexamination process by applying the verified COLA or interest rate to fixed-income sources. The PHA will always obtain third-party verification as outlined in Notice PIH 2023-27 and Chapter 7 of this policy.
	7-I.F. Level 4 Verification	Language updated: PHA Policy The PHA will follow EIV security requirements as detailed in PHA policy in Section 7-I.A. Family Consent to Release of Information. If an adult family member other than the head of household fails to sign a consent form stating that their EIV income information may be shared with the head of household, the PHA will utilize EIV's "Print Household Member Information" feature to generate income reports addressed separately to each adult in the household. For example, if a household has two adults, the PHA will provide one report to the head of household and a separate report to the other adult member.

7	7-II.G. Citizenship of Eligible Immigration Status	Language Added: The PHA must verify immigration status with the United States Citizenship and Immigration Services (USCIS). The primary method for verifying eligible immigration status is USCIS's automated system, Systematic Alien Verification for Entitlements (SAVE). The PHA must determine whether the applicant's status makes them eligible for assistance consistent with Section 214. Exhibit 7-2 at the end of this chapter provides information on eligibility for HUD assistance. Where applicable, the PHA must retain documentation of SAVE verification in tenant files. If SAVE cannot confirm an individual's eligible immigration status, or if the response in SAVE verifies an immigration status that is not eligible for assistance, then the PHA must submit a request for secondary or additional verification to USCIS within 10 days of receiving the initial results. The PHA must scan and upload information to USCIS as needed or required to obtain a verification response. If the secondary or additional verification fails, the PHA must notify the family and inform them of their right to file an appeal with USCIS. If the family wishes to exercise their right to file an appeal with USCIS, they must submit a written request to USCIS within 30 days of the notification. USCIS will render a decision to the family and forward a copy to the PHA. Assistance must be denied when primary and secondary verification do not verify eligible immigration status and the family does not pursue a USCIS appeal or informal hearing rights, or decisions are rendered against the family through a USCIS appeal or informal hearing. The PHA must not delay, deny, reduce, or terminate assistance because of a delay in the process of determining eligible status, unless the family causes the delay. While the PHA may not admit any individual prior to receiving required documentation, the PHA may elect to provide prorated assistance to the family prior to completing the verification process. Family members who do not sign a declaration of their status or provide the required supporting documentation will be considered ineligible for housing assistance. The head of household must sign a statement listing all family members who do not claim to be citizens, nationals, or eligible immigrants, or whose status cannot be confirmed [HUD Secretary Letter 12/16/25].
	7-II.H. Verification of Preference Status	Language Updated: PHA Policy • The PHA will offer a preference to any family that has been terminated from its HCV program due to

7		insufficient program funding. The PHA will verify this preference using the PHA's termination records. • The PHA also offers a preference to families that include victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking who are seeking an emergency transfer under VAWA from the PHA's public housing program or other covered housing program operated by the PHA (as described in Section 4-III.C). To verify that applicants qualify for the preference, the PHA will review internal agency records and follow documentation requirements outlined in Section 16-IX.D. • The PHA offers a preference for public housing residents who will be displaced due to HUD-approved repositioning activities. The PHA will verify this preference using PHA records from the Housing Authority of the City of Eureka. • The PHA offers a preference for EHV clients whose funding has expired or is about to expire. The PHA will verify this preference using the PHA's internal participant records. • The PHA offers a moving-on preference, and verification of eligibility and preference status will be included with referral for voucher from the CoC participating agency.
	7-III.C. Periodic Payments and Payments in Lieu of Earnings	New Policy: PHA Policy If an EIV income report must be provided to the family, the PHA will follow EIV security requirements as detailed in PHA policy in Section 7-I.A. Family Consent to Release of Information.
8	NSPIRE and HQS	Language Added: Even once the HQS inspection standard has sunset, the regulations at 24 CFR Part 982 and 983 governing the HCV and PBV programs will continue to use the terms *HQS* and *housing quality standards* rather than *NSPIRE*. This is because the definition of *housing quality standards (HQS)* at 24 CFR 982.4 means the minimum quality standards developed by HUD in accordance with 24 CFR 5.703 for the HCV program, including any variations approved by HUD for the PHA. As such, the model policy uses the term *housing quality standards* whenever applicable regulations use this term. Except in the chapter describing HQS, the acronym *HQS* is not used in the model policy in order to avoid confusion between the umbrella term meaning housing standards and the specific inspection protocol. The model policy only uses the term *NSPIRE* when referring to specific NSPIRE standards.

8	8-I.B. Affirmative Habitability Requirements	Language Added: As of December 29, 2004, (the effective date of the Public and Federally Assisted Housing Fire Safety Act of 2022), smoke alarms have must have either a sealed 10-year battery or be hard wired.
	8-I.C. Modifications to Provide Accessibility	New Policy: PHA Policy Any owner that intends to negotiate a restoration agreement or require an escrow account must submit the agreement(s) to the PHA for review.
	8-I.F. Owner and Family Responsibilities	Language Added and New Policy: **Owner Obligation** The owner must maintain the unit in accordance with housing quality standards. A unit is not in compliance with housing quality standards if the PHA or other inspector authorized by the state or local government determines that the unit has housing quality standards deficiencies based upon an inspection, notifies the owner in writing of the deficiencies, and the deficiencies are not remedied within the appropriate time frame. In the case of a housing quality standards deficiency that the PHA determines is caused by the tenant, any member of the household, or any guest or other person under the tenant's control (other than damage resulting from ordinary use), the PHA may waive the owner's responsibility to remedy the violation. The HAP to the owner may not be withheld or abated if the owner responsibility has been waived. However, if the family's actions constitute a serious or repeated lease violation, the owner may take legal action to evict the family. In addition, the PHA may terminate the family's assistance because of a housing quality standards breach (beyond damage resulting from ordinary use) caused by any member of the household, guest, or other person under the tenant's control. PHA Policy The PHA will waive the owner's responsibility for housing quality standards deficiencies that have been determined to have been caused by the tenant, any member of the household, or any guest or other person under the tenant's control, to the extent the tenant can be held responsible for ensuring that the deficiencies are corrected: the tenant must take all necessary steps permissible under the lease and state and local law to remedy the deficiency. This may include paying the owner for the cost of the necessary repairs in accordance with the lease. If the PHA has waived the owner's responsibility to remedy the violation as outlined under the owner obligations above, the following applies:

8		• If the housing quality standards breach caused by the family is life-threatening, the family must take all steps permissible under the lease and state and local law to ensure the deficiency is corrected within 24 hours of notification. • For other family-caused deficiencies, the family must take all steps permissible under the lease and state and local law to ensure the deficiency is corrected within 30 calendar days of notification (or any PHA-approved extension). If the family has caused a breach of housing quality standards, the PHA must take prompt and vigorous action to enforce the family obligations. The PHA may terminate assistance for the family in accordance with 24 CFR 982.552.
	8-II.A. Overview; Types of Inspections	Language Updated: • *Interim Inspections.* A special inspection may be requested by the owner, the family, or a third party as a result of problems identified with a unit between annual inspections. *(These were formerly known as "special inspections".)* • *Supervisory Control Inspections.* HUD requires that a sample of units be inspected by a supervisor or other qualified individual to evaluate the work of the inspector(s) and to ensure that inspections are performed in compliance with housing quality standards. *(These were formerly known as QCIs, or Quality Control Inspections.)*
	8-II.A. Remote Video Inspections (RVIs)	Language Updated: PHA Policy The PHA may conduct reinspection on 24-hour required repairs via RVI if it is feasible to discern whether the deficiency was adequately cured. A common example of this would be a missing smoke alarm that has been reinstalled, and via RVI has been shown to be in place and working.
	8-II.F. Inspection Results and Reinspections for Units Under HAP Contract	Language Added: Notification of Corrective Actions [24 CFR 982.404(d)(1)] The owner must maintain the unit in accordance with housing quality standards. The unit is in noncompliance with housing quality standards if: • The PHA or authorized inspector determines the unit has housing quality standards deficiencies based upon an inspection

8		• The PHA notified the owner in writing of the unit housing quality standards deficiencies; and • The unit’s housing quality standards deficiencies are not corrected within the required timeframes. A PHA may withhold assistance payments for units that have deficiencies once the owner has been notified in writing of the deficiencies. The PHA’s administrative plan must identify the conditions under which the PHA will withhold HAP. In this case, if the unit is brought into compliance during the applicable cure period, the PHA must resume assistance payments and provide payments to cover the time period for which the payments were withheld.
	8-II.G. Enforcing Owner Compliance	Language Added and New Policy: HAP Withholding [24 CFR 982.404(d)(1)] A PHA may withhold assistance payments for units that have housing quality standards deficiencies once the PHA has notified the owner in writing of the deficiencies. The PHA’s administrative plan must identify the conditions under which the PHA will withhold HAP. In this case, if the unit is brought into compliance during the applicable cure period, the PHA resumes assistance payments and provides assistance payments to cover the time period for which the payments were withheld. PHA Policy The PHA will not withhold assistance payments upon notification to the owner of the deficiencies.
9	9-I.E. PHA Leasing Assistance for Families	Language Added and New Policy: PHAs may utilize their Unrestricted Net Position (UNP, or administrative fee reserves) or ongoing administrative fees towards activities designed to help assist HCV families in leasing units under the program. Such activities include providing security deposit assistance, utility deposit assistance, assisting with all or some of the application fee or similar fees, and holding fees. PHA Policy The PHA will not utilize UNP or ongoing administrative fees to pay security deposits, utility deposits, assist with application or similar fees, or holding fees.
	9-I.F. Lease and Tenancy Addendum; Term of Assisted Tenancy	Language Updated: PHA Policy The PHA will approve an initial lease term of less than one (1) year where the PHA determines and can clearly

		document that: (i) Such shorter term would improve housing opportunities for the tenant; and (ii) Such shorter term is the prevailing local market practice.
	9-I.H. HAP Contract Execution	Language Updated: Any HAP contract executed after the 60-day period is void, and the PHA may not pay any housing assistance payment to the owner unless there are extenuating circumstances that prevent or prevented the PHA from meeting the 60-day deadline, in which case the PHA may submit to the HUD field office a request for an extension. The request, which must be submitted no later than two weeks after the 60-day deadline, must include an explanation of the extenuating circumstances and any supporting documentation. HUD at its sole discretion will determine if the extension request is approved.
11	11-I.B. Scheduling Annual Reexaminations; Notification of and Participation in the Annual Reexamination Process	Language Updated: PHA Policy Annual reexaminations will be conducted by mail. Notification of the annual reexamination will be sent by first-class mail and will inform the family of the information and documentation that must be provided to the PHA, and the deadline for providing it. Documents will be accepted by mail, by email, by fax, or in-person. The PHA will, however, conduct reexaminations in person if the family requests assistance in providing information or documentation requested by the PHA, including if requested as a reasonable accommodation. Reasonable accommodation requests will be handled in accordance with policies in Chapter 2. An advocate, interpreter, or other assistant may assist the family in the interview process. The family and the PHA must execute a certification attesting to the role and the assistance provided by any such third party. Further, an in-person interview may be scheduled if the required paperwork is not returned timely, or if it is returned timely but is not complete. If the family does not attend the scheduled interview, the PHA will send a second notification with a new interview appointment time. If the family misses the rescheduled appointment and has not otherwise turned in complete paperwork as requested, they may be issued a notice of termination of assistance. If the reexamination notice is returned by the post office with no forwarding address, a notice of termination (see Chapter 12) will be sent to the family's address of record, as well as to any alternate address provided in the family's file.

11	11-I.C. Conducting Annual Reexaminations	Language Updated: PHA Policy Families will be asked to return the annual reexamination packet and submit verification documentation by the deadline provided in the notice provided. Required information will include the PHA-designated reexamination form, as well as supporting documents or forms related to the family's income, expenses, and family composition. The PHA will notify the family in writing if any required documentation or information is missing. The missing information or documentation must be provided within **10 business days** of the date the PHA notifies the family. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the family requests or the PHA schedules an in-person interview, families will be asked to bring all required information (as described in the reexamination notice) to the reexamination appointment. Any required documents or information that the family is unable to provide at the time of the interview must be provided within **10 business days** of the interview. If the family is unable to obtain the information or materials within the required time frame, the family may request an extension. If the family does not provide the required documents or information within the required time period (plus any extensions), the family will be sent a notice of termination (See Chapter 12).
	11-II.B. Changes in Family and Household Composition	Language Added and New Policy: Conducting Interims [Notice PIH 2023-27] PHAs must conduct interim reexaminations when a household adds or removes household members, including family members, foster adults, foster children, and live-in aides. An interim reexamination is processed to add the new member regardless of whether the change results in a decrease, increase, or no change in the family's annual adjusted income. The exception to this policy is if, during the last three months of the family's recertification period, the family is adding or removing household members and the change would require an interim reexamination for an increase in the family's adjusted income, and the PHA has a written policy not to conduct interim reexaminations under these circumstances, then the PHA is not required to conduct an interim reexamination. If PHA policy allows for this, the PHA would instead include the change in household composition (and any related changes to income or allowances) at the

		family's next annual reexamination. A non-interim reexam transaction is not submitted in this case. PHA Policy The PHA will conduct an interim reexamination any time the family has a change in family composition. Otherwise, interim reexaminations are always conducted for changes in household composition. Changes to the household's adjusted income are processed as follows: • When the addition or removal of a household member changes the deductions for which the family qualifies, the PHA processes the interim increase or decrease regardless of the amount of the change. • When a household member is added who has earned income that would cause the household's adjusted income to increase, the PHA must not consider increases in earned income, unless the family has previously received an interim reduction during the same reexamination cycle, and PHA policy allows for an interim reexamination in this circumstance. If the increase is not considered, then an interim reexamination is processed to add the new member, but their income is not added until the family's next annual reexamination. PHA Policy When a household member is added who has earned income that would cause the household's adjusted income to increase between annual reexaminations, the PHA will not conduct an interim reexamination, regardless of the amount of the increase, and regardless of whether there was a previous decrease since the family's last annual reexamination. The PHA will process an interim to add the new member, but their income will not be added until the family's next annual reexamination. • When a new household member is added who has unearned income, the PHA must process an interim reexamination regardless of the amount of the increase. • When a new household member is added who has both earned and unearned income, the PHA must not consider increases in earned income, unless the family has previously received an interim reduction during the same reexamination cycle, and PHA policy allows for an interim reexamination in this circumstance. For the unearned income, the PHA processes the interim increase regardless of the amount of the increase.

11	11-II.C. Changes Affecting Income or Expenses; Interim Increases	Language Updated: PHA Policy The PHA will process an interim reexamination for any increases in income estimated to be a 10 percent or more increase in adjusted income.
	11, Part III: Non-Interim Reexamination Transactions	Language Added: Families may experience changes within the household that do not trigger an interim reexamination under PHA policy and HUD regulations, but which HUD still requires the PHA to report to HUD via Form HUD-50058. These are known as *non-interim reexamination transactions*. In these cases, PHAs will submit a separate, new action code on Form HUD-50058. The following is a list of non-interim reexamination transactions: • Adding or removing a hardship exemption for the childcare expense deduction; • Updating or removing the phased-in hardship relief for the health and medical care expense deduction and/or reasonable attendant care and auxiliary apparatus expense deduction (families will begin receiving a 24-month phased-in relief at their next annual or interim reexamination, whichever occurs first); • Adding or removing general hardship relief for the health and medical care expense deduction and/or reasonable attendant care and auxiliary apparatus expense deduction; • Adding or removing a minimum rent hardship; • Adding or removing a non-family member (i.e., live-in aide, foster child, foster adult); • Ending a family's EID or excluding 50 percent (decreased from 100 percent) of a family member's increase in employment income at the start of the second 12- month EID period. • Adding a family member and the increase in adjusted income does not trigger an interim reexamination under the final rule; • Removing a family member and the increase in adjusted income does not trigger an interim reexamination under the final rule; • Adding/updating a family or household member's Social Security number; • Updating a family member's citizenship status from eligible to ineligible or vice versa, resulting in a change to the family's rent and/or utility reimbursement, if applicable (i.e., family begins receiving prorated assistance or previously prorated assistance becomes full assistance), or updating the prorated rent calculation

		due to the addition or removal of family members in household with an ineligible noncitizen(s); and • Rent increases PHAs must make all other changes to assets, income, and deductions at the next annual or interim reexamination of income, whichever is sooner.
12	12-I.D. Mandatory Termination of Assistance; Death of the Sole Family Member	Language Updated: For deceased single-member households, PHAs must terminate the HAP to owner no later than the last day of the month in which the death occurred. HAP remitted for any month following the month in which the death occurred are considered HAP overpayments. After confirming the head of household's death, the PHA must submit an End of Participation (EOP) Form HUD-50058 with the EOP date listed as the last day of the month in which the death occurred. The PHAs is required to submit the Form HUD-50058 no later than 60 calendar days from the effective date of the action. In cases where there is a delay between the death of an individual and when the death is reported in EIV, the PHA must submit an updated Form HUD-50058 no later than 60 days from the date EIV received the death information. The owner is entitled to receive the full HAP amount for the month in which the tenant death occurred.
	12-I.D. Mandatory Termination of Assistance; Family Absence from the Unit	Language Added and New Policy: The family may be absent from the unit for brief periods. The PHA must establish a policy on how long the family may be absent from the assisted unit. However, the family may not be absent from the unit for a period of more than 180 consecutive calendar days for any reason. *Absence* in this context means that no member of the family is residing in the unit. At its discretion, the PHA may allow absence for a lesser period in accordance with PHA policy. Housing assistance payments terminate if the family is absent for longer than the maximum period permitted. The term of the HAP contract and assisted lease also terminate. The owner must reimburse the PHA for any housing assistance payment for the period after the termination. The family must supply any information or certification requested by the PHA to verify that the family is residing in the unit or relating to family absence from the unit. The family must cooperate with the PHA for this purpose. The family must promptly notify the PHA of absence from the unit, including any information requested on the purposes of family absences. The PHA may adopt appropriate techniques to verify family occupancy or absence, including letters to the family at the

		unit, phone calls, visits, or questions to the landlord or neighbors. The PHA administrative plan must state the PHA policies on family absence from the dwelling unit. The PHA absence policy includes how the PHA determines whether or when the family may be absent, and for how long; and any provision for resumption of assistance after an absence, including readmission or resumption of assistance to the family. PHA Policy The family is required to notify the PHA when all family members will be absent from the unit for any period greater than 30 calendar days. Written notice must be provided to the PHA at the start of the extended absence. Upon PHA request, the family must provide any additional information to the PHA related to the family's absence from the unit to confirm their continued residency in the unit. The PHA may take the following actions to determine whether the family is absent from the unit: • Write letters to the family at the unit; • Telephone the family at the unit; • Contact the owner; • Interview neighbors; • Verify whether utilities are in service; and/or • Check with the post office. If the family is absent from the unit for more than 180 consecutive calendar days, the family's assistance will be terminated. Notice of termination will be sent in accordance with Section 12-II.F. A family terminated due to PHA error will be reinstated retroactively. Any family terminated due to absence from the unit may reapply for assistance when the waiting list is open.
12	12-I.E. Mandatory Policies and Other Authorized Terminations; Other Authorized Reasons for Termination of Assistance	Language Updated: PHA Policy The PHA **will** terminate a family's assistance if: The family has failed to comply with any family obligations under the program. See Exhibit 12-1 for a listing of family obligations and related PHA policies. Any family member has been evicted from federally assisted housing in the last three years. Any family member has committed fraud, bribery, or any other corrupt or criminal act in connection with any federal housing program. The family currently owes rent or other amounts to any PHA in connection with Section 8 or public housing assistance under the 1937 Act. The family has not reimbursed any PHA for amounts the PHA paid to an owner under a HAP contract for rent,

		damages to the unit, or other amounts owed by the family under the lease. The family has breached the terms of a repayment agreement entered into with the PHA. A family member has engaged in or threatened violent or abusive behavior toward PHA personnel. *Abusive or violent behavior towards PHA personnel* includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior. *Threatening* refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence. The family was evicted for repeated violation(s) of the lease. *Repeated lease violations* will include, but not be limited to, nonpayment of rent, disturbance of neighbors, destruction of property, or living or housekeeping habits that cause damage to the unit or premises, and criminal activity. Generally, the criterion to be used will be whether or not the reason for the eviction was the fault of the tenant or guests.
	12-I.E. Mandatory Policies and Other Authorized Terminations; Other Authorized Reasons for Termination of Assistance; Insufficient Funding	Language Updated: PHA Policy The PHA will determine whether there is sufficient funding to pay for currently assisted families according to the policies in Part VIII of Chapter 16. If the PHA determines there is a shortage of funding, prior to terminating any HAP contracts, the PHA will determine if any other actions can be taken to reduce program costs. Actions that may be taken to reduce costs include, but are not limited to: • Rescinding applicant vouchers (with HUD approval); • Reducing subsidy standards; • Reducing payment standards, including discontinuing the use of HUD-approved exception payment standards, if any (mandatory for a PHA in shortfall); • Applying reduced payment standards at the earliest allowable date: o If no family composition change: no earlier than two years from the effective date of the payment standard reduction o In response to a household composition change resulting in a change to the family unit size (voucher size): immediately, upon the effective date of the action adding/removing the household member.

		• Not absorbing vouchers under portability;
		• Reviewing utility allowance rates;
		• Not increasing utility allowances until rates increase by 10 percent or more since the last utility allowance update;
		• Conducting rent reasonableness on units currently under lease when local rental rates have decreased;
		• Increasing the PHA's minimum rent;
		• Denying moves to higher cost areas under portability unless the receiving PHA will absorb;
		• Denying local moves to higher cost units;
		• Not issuing Choice Mobility vouchers to PBV tenants until such time as funding permits;
		• Contacting PHAs currently administering the PHA's vouchers and requesting they absorb;
		• Requesting owners asking for a rent increase to delay their request (the PHA must honor if the requested rent is reasonable and all other requirements are met); and
		• Seeking HUD waivers:
		  ○ To apply decreased payment standards immediately
		  ○ To establish payments standards below 90 percent of the FMR

13	13-I.A. Owner Recruitment and Retention; Owner Incentive/Retention Payments	Language Added and New Policy: The PHA may utilize its Unrestricted Net Position (UNP, or administrative fee reserve) or ongoing administrative fees to make owner incentive payments (e.g., signing bonuses) or retention payments to owners that agree to initially lease their unit to an HCV family and/or renew the lease of an HCV family. If a PHA chooses to offer incentive or retention payments, it must adopt a policy that governs when the offer of such payments is appropriate. Owner incentive payments are not housing assistance payments, nor can they effectively serve to supplement ongoing, monthly housing assistance payments. Owner incentive payments are not part of the rent to owner, nor are they taken into consideration when determining whether the rent for the unit is reasonable. PHA Policy The PHA may provide, subject to funding availability and determination of need in order to support voucher utilization success, owner incentive or retention payments. Incentives may also be made available based on targeted funding programs (e.g. VASH, Mainstream) if additional administrative fees have been awarded for such use.
15	15-IV.B. Payment Standard, Utility	Language Added: Use of Exception Payment Standards [Notice PIH 2025-12]

	Allowance, and HAP Calculation (Shared Housing)	If a PHA determines that an exception payment standard higher than 120 percent of the FMR/SAFMR for the unit size may be necessary as a reasonable accommodation, the PHA must submit a request to the appropriate HUD field office. For shared housing, the threshold for requiring HUD approval of an exception payment standard as a reasonable accommodation is based on the FMR of the voucher size approved for the family. The pro-rata calculation required for shared housing only applies to the payment standard and utility allowance. The pro-rata calculation should not be applied to the FMR. The payment standard for a family that resides in shared housing is the lower of: (1) the payment standard amount on the PHA payment standard schedule for the family unit size; or (2) the pro-rata portion of the payment standard amount on the PHA payment standard schedule for the size of the shared housing unit. See Appendix A of Notice PIH 2025-12 for an example of the shared housing calculation.
16	16-II.B. Payment Standards; Reasonable Accommodation	Language Added: When a family requires a unit with specific features or for other disability-related reasons to accommodate a family member with a disability, and the family is unable to find a unit with those features or that otherwise meets the disability-related need within the established payment standard, the family may request an exception to the established payment standard as a reasonable accommodation. This type of exception does not affect the PHA's payment standard schedule. Examples of circumstances that may qualify for an exception payment standard include, but are not limited to: • Accessibility features such as accessible bathrooms or larger doorways; • Access to ground-level units or elevators for wheelchair/mobility devices; • Units with features to benefit individuals with hearing or visual impairments; • Proximity to medical providers or other services/supports; • Accessible parking on the premises; • Accessible to essential services or daily life activities; • Proximity to public transit or to other accessible transportation; and • Location with sidewalks for individuals who use wheelchairs/mobility devices The PHA must evaluate each request on a case-by-case basis. If required as a reasonable accommodation, the PHA may make an exception to the payment standard without HUD approval if the exception amount does not exceed 120

		percent of the applicable FMR/SAFMR for the unit size (or in the case of VASH, up to 140 percent of the FMR/SAFMR). The PHA may request HUD approval in accordance with Notice PIH 2025-12 for an exception to the payment standard for a particular family if the required amount exceeds 120 percent of the FMR/SAFMR. Unless the disability or the disability-related need is obvious, readily apparent, or already known, the family must document the disability-related need for the exception payment standard. In order to approve an exception, or request an exception from HUD, the PHA must determine that: • There is a disability-related need for the particular unit (which may include location); • The gross rent for the unit is above the PHA's payment standard; • The family share would otherwise exceed 40 percent of adjusted monthly income; and • The rent for the unit is reasonable. The exception payment standard for the specific dollar amount approved by the PHA or HUD remains effective as long as the family has a disability-related need for the features of the approved unit, and the rent remains reasonable. Requests for a higher exception payment standard for the same unit due to rent increases or changes in the family's income should only be submitted to HUD when the rent is no longer affordable to the family, typically (though not exclusively) when the family share exceeds 40 percent of adjusted monthly income, and if the higher payment standard is above 120 percent of the FMR/SAFMR in effect at the time the PHA determines that the higher payment standard is necessary.
	16-III.B. Informal Reviews; Ensuring Accessibility for Persons with Disabilities and LEP Individuals	Language Updated: Due to the individualized nature of disability, the appropriate auxiliary aid or service necessary, or reasonable accommodation, will depend on the specific circumstances and requirements. PHA Policy Informal reviews will be conducted in English. For applicants who may require language assistance, the PHA will responsibly use artificial intelligence, a PHA staff person who can interpret, and/or machine translation to communicate. The PHA will also permit families to bring an advocate, family member, friend, or other adult representative to assist in communications.

16	16-III.C. Informal Hearings for Participants; Pre-Hearing Right to Discovery	Language Updated: PHA Policy The family will be allowed to copy any documents related to the hearing at a cost of $0.25 per page to the family. This cost will be regardless of whether hard copy or scanned copy is provided, to cover the cost of PHA administrative expenses. The family must request discovery of PHA documents no later than 12:00 p.m. on the business day prior to the scheduled hearing date. If the hearing will be conducted remotely, the PHA will compile a hearing packet, consisting of all documents the PHA intends to produce at the informal hearing. The PHA will mail copies of the hearing packet to the family, the family's representatives, if any, and the hearing officer at least three days before the scheduled remote informal hearing. The original hearing packet will be in the possession of the PHA representative and retained by the PHA. Documents will be shared electronically whenever possible and/or upon request.
	16-IV.B. Repayment Policy; Criminal Prosecution for Program Fraud/Abuse	Language Added and New Policy: Local, state or federal criminal prosecution should be considered by the PHA in flagrant cases, if the abuse was committed over several years, the fraud and/or underpayments are substantial and the PHA documents that a family and/or owner willfully intended to misrepresent the truth [HUD OIG Integrity Bulletin, Summer 2015]. PHA Policy The PHA will consult with the HUD Field Office and regional OIG Special Agent in Charge (SAC) to determine whether it will refer the matter to the state or local district attorney to pursue criminal fraud charges.
	16-IV.B. Repayment Policy; Returned Item Fee	Language Added: Payments returned unpaid by a financial institution for any reason (e.g., insufficient funds, closed account, stop payment, or account restrictions) are subject to a returned item fee. The PHA will charge the payer an amount equal to any fee incurred by the PHA as a result of the returned item. The payer remains responsible for the original payment amount and any applicable returned item fee. If repayment of the returned item and applicable fee is not received by the close of business on the 15th of the month in which the payment is due, the payment will be considered late or missed and will be handled in accordance with the PHA's policies regarding late or missed payments.

16	16-IV.C Records Management; Medical/ Disability Records	Language Updated: PHAs are not permitted to inquire about the nature or extent of a person's disability. The PHA may not inquire about a person's diagnosis or details of treatment for a disability or medical condition. If the PHA receives documentation from a verification source that contains the individual's specific diagnosis, information regarding the individual's treatment, and/or information regarding the nature or severity of the person's disability, the PHA will immediately dispose of this confidential information; this information will never be maintained in the individual's file. If the information needs to be disposed of, the PHA will note in the individual's file that verification was received, the date received, and the name and address of the person/organization that provided the verification. Under no circumstances will the PHA include an applicant's or resident's medical records in the file.
17	17-I.A. Overview (Project-Based Vouchers); Public Housing Repositioning	Language Added and New Policy: In addition to developing a standard PBV program as described above, PHAs may also participate in the PBV program through public housing repositioning. Policies in this chapter may apply to units converted through repositioning depending on the type of activity undertaken by the PHA. If the PHA has any RAD PBV, Section 18, or RAD/Section 18 blend PBV units, policies governing those units are identified below. PHA Policy The PHA works seamlessly with the Housing Authority of the City of Eureka ("HACE"), sharing office space and management staff. HACE is undergoing public housing repositioning activity, and the Housing Authority of the County of Humboldt has passed resolutions agreeing to administer any vouchers for HACE related to repositioned units, whether for new construction units or for rehabilitated units. HACE has public housing units that have undergone a Section 18 demolition/disposition (demo/dispo), and HACH may project-base the related Tenant Protection Vouchers (TPVs) received from HUD. Policies in Chapter 17 are applicable to these units since regulations and policies for the standard PBV program apply to TPVs converted to PBV.
	17-I.C. Maximum Number of PBV Units (Percentage Limitation); Increased Cap [24 CFR 983.6(d)]	Language Added and New Policy: The PHA may project-base an additional 10 percent of its authorized voucher units above the 20 percent program limit, provided the units meet requirements outlined in 24 CFR 983.6(d)(1) or (2). The units may be distributed among one, all, or a combination of the categories described below, as long as the total number of units does not exceed

17		the 10 percent cap. The PBV HAP contract must specify, and the owner must set aside, the number of units meeting the conditions to qualify for the increased program cap. To qualify for the increased program cap, the unit must be occupied by the type of family specified in the applicable paragraph below.
		
		For units under a HAP contract that was first executed on or after April 18, 2017, or added on or after that date to a current HAP contract entered into prior to April 19, 2017, units qualify under the increased program cap if the units meet one or more of the conditions below [24 CFR 983.6(d)(1)]:
		• The units are specifically made available to house individuals and families that meet the definition of *homeless* under section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302) and contained in the Continuum of Care Interim Rule at 24 CFR 578.3.
		  o A family qualifies if they were homeless at the time the family first occupies the unit.
		• The units are specifically made available to house families that are comprised of or include a veteran at the time the family first occupies a unit.
		  o A *veteran* is person who served in the active military, naval, air, or space service, and who was discharged or released therefrom.
		• The units provide supportive housing to persons with disabilities or elderly persons as defined in 24 CFR 5.403.
		  o A disabled or elderly member of the family must be eligible for one or more of the supportive services at the time the family first occupies the unit. The member of the family may choose not to participate in the services.
		  o *Supportive housing* means that the project makes supportive services available for all of the assisted families in the project and provides a range of services tailored to the needs of the residents occupying such housing.
		  o Such supportive services need not be provided by the owner or onsite but must be reasonably available to the families receiving PBV assistance in the project.
		  o The PHA's administrative plan must describe the type and availability of supportive services the PHA will consider as qualifying for the 10 percent increased cap.
		• The units are located in areas where vouchers are difficult to use.

17		• The units replace, on a different site, units listed in 24 CFR 983.59(b)(1) and (2) for which the PHA had authority under 24 CFR 983.59 to commit PBV assistance on the original site without the units counting toward the program cap or project cap. The increased program cap also applies to units that are part of a HAP contract executed on or after December 27, 2020, or are added on or after that date to any current HAP contract, including a contract entered into prior to December 27, 2020, and meet the following requirements [24 CFR 983.6(d)(2)]: • The units are exclusively made available to eligible youth receiving Family Unification Program (FUP) or Foster Youth to Independence (FYI) assistance; and • If the units exclusively made available to eligible youth use FUP assistance that is normally available for eligible families and youth, the PHA determines and documents that the limitation of the units to youth is consistent with the local housing needs of both eligible FUP populations (families and youth) and amends its administrative plan to specify that FUP PBV assistance is solely for eligible youth. PHA Policy The PHA will project-base up to an additional 10 percent of its authorized units, up to 30 percent, for any of the categories listed above or otherwise allowed, in accordance with HUD regulations and requirements.
	17-I.D. Cap of Number of PBV Units in Each Project; Exceptions to the Project Cap [24 CFR 983.54(c)]	Language Added and New Policy: Certain units are removed from the number of dwelling units for purposes of calculating the project cap. These are known as *excepted units,* which are defined as units in a project not counted toward the project cap because they exclusively service or are made available to certain families. The PHA determines the number of units in the project for which the PHA will provide project-based assistance, including whether and how many units will be excepted. The PBV HAP contract must specify, and the owner must set aside, the number of excepted units made available for occupancy by families who qualify for the exception. For a unit to be considered excepted, it must be occupied by a family who qualifies for the exception. Which units are considered excepted differs depending on when the HAP contract was executed. Contracts executed prior to April 18, 2017, follow the "old" statutory PBV requirements for excepted units. Projects where the HAP contract was executed on or after April 18, 2017, follow new

17		requirements. In this case, PBV units are not counted toward the project cap if the units are: • Exclusively for elderly families; • Exclusively made available to eligible youth receiving FUP or FYI assistance; or • For households eligible for supportive services available to all families receiving PBV assistance in the project. A project is not limited to a single exception category but may include excepted units from any of the exception categories. PHA Policy The PHA will have excepted units in certain PBV projects.
	17-I.E. Units Not Subject to the PBV Program Cap or Project Cap [FR Notice 1/18/17 and 24 CFR 983.59]	Language Added and New Policy: For HAP contracts that first became effective on or after April 18, 2017, the PHA may commit project-based assistance to units that meet the requirements below without the units counting toward the program cap (including the 10 percent exception) or project cap. These are known as *excluded units* and fall into two different categories: • **Existing or Rehabilitation Units:** In the five years prior to the request for proposals (RFP) or the proposal or project selection date (in the case of selection without RFP), these units fall into one of the categories described below, provided that the units are removed from all categories prior to the effective date of the HAP contract. These units include units that received one of the following forms of HUD assistance: – Public Housing Capital or Operating Funds; – Project-Based Rental Assistance (Section 8), including units assisted under Section 8 Moderate Rehabilitation (Mod Rehab) and Mod Rehab Single-Room Occupancy (SRO) programs; – Housing for Elderly (Section 202); – Housing for Persons with Disabilities (Section 811); – Rental Assistance Program (RAP) (Section 236(f)(2) of the National Housing Act); or Flexible Subsidy Program (Section 201 of the Housing and Community Development Amendments of 1978). Or the units have been subject to a federally required rent restriction under one of the following programs: – The Low-Income Housing Tax Credit program (26 U.S.C. 42); – Section 515 Rural Rental Housing Loans (42 U.S.C. 1485); or

17		– The following HUD programs: – Section 236; – Section 221(d)(3) Below Market Interest Rate; – Housing For the Elderly (Section 202 of the Housing Act of 1959); – Housing for Persons with Disabilities (Section 811 of the Cranston-Gonzalez National Affordable Housing Act); – Flexible Subsidy Program (Section 201 of the Housing and Community Development Amendments Act of 1978); or – Any other program identified by HUD through Federal Register notice subject to public comment. • **Replacement Units:** Newly constructed units developed under the PBV program are also considered excluded units if the primary purpose of the newly constructed units is or was to replace units that meet the criteria listed above. The newly constructed unit must be located on the same site as the unit it is replacing; however, an expansion of or modification to the prior project's site boundaries as a result of the design of the newly constructed project is acceptable as long as a majority of the replacement units are built back on the site of the original project and any replacement units that are not located on the existing site are part of a project that shares a common border with, are across a public right of way from, or touch that site. In addition, in order for the replacement units to be excluded from the program and project caps, one of the following must be true: – Former residents of the original project must be provided with a selection preference that provides the residents with the right of first occupancy at the PBV newly constructed project when it is ready for occupancy; or – Prior to the demolition of the original project, the PBV newly constructed project must have been identified as replacement housing for that original project as part of a documented plan for the redevelopment of the site. PHA Policy Units in the following projects are not subject to the program cap or project cap because they are excluded units: – HACE Public Housing units and/or Public Housing rehabilitated or replacement units – HACE other existing units meeting the definition above of excluded units

17	17-III.A. Housing Quality Standards; Housing Quality and Design Requirements [24 CFR 983.101(e) and 983.208(a)]	Language Added and New Policy: The PHA may elect to establish additional requirements for quality, architecture, or design of PBV housing. Any such additional requirements must be specified in the AHAP and the HAP contract. These requirements must be in addition to, not in place of, compliance with housing quality standards. The PHA must specify the conditions under which it will require additional housing quality requirements in the administrative plan. PHA Policy The PHA will identify the need for any special features on a case-by-case basis depending on the intended occupancy of the PBV project. The PHA will specify any special design standards or additional requirements in the invitation for PBV proposals (if applicable), the AHAP, and the HAP contract.
	17-III.D. Inspection Units; Interim Inspections [24 CFR 983.103(f)]	Language Added and New Policy: If a participant or government official notifies the PHA of a potential deficiency in a PBV unit or development, the following applies: • If the reported deficiency is life-threatening, the PHA must, within 24 hours of notification, both inspect the housing unit and notify the owner if the life-threatening deficiency is confirmed. The owner must then make the repairs within 24 hours of PHA notification. • If the reported deficiency is non-life-threatening, the PHA must, within 15 days of notification, both inspect the unit and notify the owner if the deficiency is confirmed. The owner must then make the repairs within 30 days of notification from the PHA or within any PHA-approved extension. PHA Policy During an interim inspection, the PHA generally will inspect only those deficiencies that were reported. However, the inspector will record any additional deficiencies that are observed and will require the responsible party to make the necessary repairs. If the periodic inspection has been scheduled or is due within 90 days of the date
	17-IV.C. Development Requirements; Labor Standards	Language Added: For any project to which labor standards apply, the PHA's written notice to the party that submitted the selected proposal or board resolution approving project-basing of assistance at the specific project must state that any construction contracts must incorporate a Davis-Bacon

17		contract clause and the current applicable prevailing wage determination.
	17-IV.C. Development Requirements; Broadband Infrastructure	Language Added: Any development activity that constitutes substantial rehabilitation (as defined by 24 CFR 5.100) of a building with more than four rental units and where the proposal or project selection date or the start of the development activity while under a HAP contract is after January 19, 2017, must include installation of broadband infrastructure, as defined in 24 CFR 5.100, except where the owner determines and documents the determination that: • The location of the new construction or substantial rehabilitation makes installation of broadband infrastructure infeasible; • The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden; or • The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible. A description of any required work item resulting from this requirement must be included in the AHAP (if applicable) or HAP contract (if applicable).
	17-V.C. Termination of the HAP Contract; Relocation Assistance	Language Added and New Policy: PHAs may assist families relocating due to the HAP contract being terminated as a result of the owner failing to make required repairs within the required time frame in finding a new unit, including using up to two months of the withheld and abated assistance payments for costs directly associated with relocating to a new unit, including security deposits, temporary housing costs, or other reasonable moving costs as determined by the PHA based on their locality. If the PHA uses withheld and abated payments to assist with relocation costs, the PHA must provide security deposit assistance to the family as necessary. The PHA must assist families with disabilities with locating available accessible units in accordance with 24 CFR 8.28 (a)(3). If the family receives security deposit assistance from the PHA for the new unit, the PHA may require the family to remit the security deposit returned by the owner of the new unit as such time that the lease is terminated, up to the amount of security deposit provided by the PHA for that unit.

17		PHA Policy The PHA will assist families with disabilities with locating available accessible units in accordance with program requirements. The PHA will use up to two months of withheld and abated payment to assist with any required security deposit at the new unit. Funds will not be used for any other relocation assistance. If the family receives a refund of a security deposit for the new unit, the PHA will not require any amount to be remitted to the PHA.
	17-VI.B. Eligibility for PBV Assistance; In-Place Families [24 CFR 983.251(b)]	Language Added: A family residing in a proposed contract unit on the proposal or project selection date is considered an *in-place family*. If an in-place family is determined to be eligible prior to placement of the family's unit on the HAP contract, the in-place family must be placed on the PHA's waiting list (if the family is not already on the list). Once the family's continued eligibility is determined (the PHA may deny assistance to an in-place family for the grounds specified in 24 CFR 982.552 and 982.553), the family must be given an absolute selection preference and the PHA must refer families to the applicable project owner for an appropriately sized PBV unit in the specific project. Admission of eligible in-place families is not subject to income targeting requirements. During the initial term of the lease under the tenant-based tenancy, an in-place tenant-based voucher family may agree, but is not required, to mutually terminate the lease with the owner and enter into a lease and tenancy under the PBV program. If the family chooses to continue the tenant-based assisted tenancy, the unit may not be added to the PBV HAP contract. The owner may not terminate the lease for other good cause during the initial term unless the owner is terminating the tenancy because of something the family did or failed to do in accordance with 24 CFR 982.310(d)(2). The owner is expressly prohibited from terminating the tenancy during the initial term of the lease based on the family's failure to accept the offer of a new lease or revision, or for a business or economic reason. If, after the initial term, the owner chooses not to renew the lease or terminates the lease for other good cause (as defined in 24 CFR 982.310(d)) to end the tenant-based assisted tenancy, the family would be required to move with continued tenant-based assistance or relinquish the tenant-

17		based voucher and enter into a new lease to receive PBV assistance in order to remain in the unit.
	17-VI.C Organization of the Waiting List; PHA Waiting List Preferences (PBV Units)	Language Updated: PHA Policy The PHA will establish selection criteria or preferences for occupancy of particular PBV developments or units, as allowed. Such preferences may be updated as needed, and currently include: Bayview Heights 1. A preference for veterans who have not been prioritized for HUD-VASH caseworker services. Laurel Canyon 1. A preference for Elderly Families. An Elderly Family is defined as a family whose head (including co-head), spouse, or sole member is a person who is at least 62 years of age. Public Housing Repositioning Preferences may be established on a project-specific basis, such as a preference for elderly families, or other preferences as may be allowed and established by the Housing Authority.
	17-VII.C. Moves; Family Right to Move	Language Updated: PHA Policy Except for families seeking protection under VAWA as described below, prior to providing notice to the owner to terminate the lease, any eligible family may submit a written request to the PHA for a voucher at any time after completing the 12-month occupancy requirement. The PHA will process the request within 10 business days of receiving the family's request. The PHA will verify that the family has met the 12-month occupancy requirement. No additional screening will be performed. If the request is approved by the PHA, the family will receive the next available tenant-based voucher. If a tenant-based voucher is not immediately available, the PHA will maintain a combined, agency-wide waiting list for all standard PBV families wishing to move after one year of PBV assistance. The list will be maintained separately from the tenant-based HCV list. Families on this list will be given priority over families on the tenant-based waiting list. The list will be organized by date and time of the family's written request. Once a family is placed on the list, the PHA will send the family an acknowledgement of receipt of their request and successful placement on the list. If a family

17		requests a tenant-based voucher and then is unable or unwilling to move once the PHA offers the family a tenant-based voucher, the family's name will be removed from the list. The family may resubmit a new request to move at any time.
	17-VII.C. Moves; Emergency Transfers under VAWA	Language Updated: In the case of a move due to domestic violence, dating violence, sexual assault, stalking, or human trafficking, PHAs must describe policies for facilitating emergency transfers for families with PBV assistance in their Emergency Transfer Plan, including when a victim has been living in a unit for less than a year or when a victim seeks to move sooner than a tenant-based voucher is available. When the family or a member of the family is or has been the victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking, and the move is needed to protect the health or safety of the family or family member, the family is not required to give the owner advance written notice or contact the PHA before moving from the unit. Additionally, when any family member has been the victim of a sexual assault that occurred on the premises during the 90-calendar-day period preceding the family's request to move, the family is not required to give the owner advance written notice or contact the PHA before moving from the unit. A PHA may not terminate the assistance of a family due to a move occurring under these circumstances and must offer the family the opportunity for continued tenant-based assistance if the family had received at least one year of PBV assistance prior to moving. If a family break-up results from an occurrence of domestic violence, dating violence, sexual assault, stalking or human trafficking, the PHA must ensure that the victim retains assistance.
19	19-II.E. Referrals and Waiting List Management (FYI Program); Waiting List Placement	Language Updated: The PHA must use the HCV waiting list for the FYI program. Youth already on the HCV program may not be transferred to an FYI voucher since they are not homeless or at-risk of homelessness. HCV regulations require PHAs to use a single waiting list for admission to its Section 8 tenant-based assistance program. To enable PHAs to more effectively allocate FUP and FYI vouchers, HUD waived 24 CFR 982.204(f) and is establishing an optional waiver to allow PHAs to maintain a separate waiting list for FUP and FYI vouchers.

19		PHA Policy The PHA will not maintain a separate waiting list for FUP and FYI vouchers. Within 10 business days of receiving the referral from the PCWA, the PHA will review the HCV waiting list and will send the PCWA a list confirming whether or not referrals are on the waiting list. Referrals who are already on the list will retain their position and the list will be notated to indicate the applicant is FYI-eligible. For those referrals not already on the waiting list, the PHA will work with the PCWA to ensure they receive and successfully complete an application. Once the application has been completed, the PHA will place the referral on the HCV waiting list with the date and time of the original referral and an indication that the referral is FYI-eligible. If the PHA's HCV waiting list is closed, the PHA will open its HCV waiting list in order to accept new FYI applicants. If necessary, the PHA may open its waiting list solely for FYI applicants, but this information must be included in the PHA's notice of opening its waiting list (see section 4-II.C., Opening and Closing the Waiting List of this administrative plan).
	19-III.C. HCV Program Eligibility (VASH); Income Eligibility	Language Updated: With some exceptions, the PHA must determine income eligibility for VASH families in accordance with 24 CFR 982.201 and policies in Section 3-II.A. **Low-income families (80 percent of AMI) are eligible for assistance under VASH**, and PHAs may not condition eligibility based on additional eligibility criteria specified in its administrative plan. If the family is over-income based on the most recently published income limits for the family size, the family will be ineligible for assistance. The following alternative requirements related to income apply to VASH families: • The PHA must determine the applicant's annual income for purposes of income eligibility by excluding all VA service-connected benefits received by the applicant. This special income exclusion only applies to the definition of *annual income* for purposes of determining income eligibility. If the HUD-VASH applicant qualifies as a low-income family under the alternative requirement, the VA service-connected benefits (with the exception of the normally excluded deferred VA disability payments under 24 CFR 5.609(b)(16) and the

		payments related to aid and attendance under 24 CFR 5.609(b)(17)) must still be included as annual income when calculating the family's adjusted income. In other words, the VA service-connected disability benefits are excluded for purposes of determining income eligibility but included for purposes of calculating the family's total tenant payment (TTP), housing assistance payment (HAP), and family share. • When a veteran family reports that they have zero income, the PHA must accept a self-certification of zero income from the family at admission and at reexamination without taking any additional steps to verify the family is indeed zero income. The self-certification does not need to be notarized. The PHA must verify families' income in the Enterprise Income Verification (EIV) system within 120 days after admission. The PHA may not deny zero income families. • Regardless of PHA policy, in determining compliance with the asset limitation at admission, for the VASH program, the PHA must accept a self-certification by the family that the family's total assets are equal to or less than the HUD-published asset limitation amount (adjusted annually) and that the family does not have any present ownership interest in real property, without taking additional steps to verify the accuracy of the declaration. • The PHA must not enforce the asset limitation for VASH families at reexamination. • In addition, because there needs to be a monthly housing assistance payment (HAP) in order to enter into a HAP contract on behalf of a tenant-based voucher family, the utilization of tenant-based VASH assistance by families determined income-eligible is limited to those areas where the family's (TTP) is less than the applicable payment standard or exception payment standard (including any VASH-specific exception payment standard established by the PHA). The family must select a unit with a gross rent that is above the family's TTP in order to lease a unit with the tenant-based VASH voucher.
	19-III.C. HCV Program Eligibility (VASH); Minimum Rent	Language Updated: PHAs must consider hardship circumstances before charging a minimum rent in accordance with 24 CFR 5.630(b). The PHA may choose to charge a lower minimum rent (including a minimum rent of $0) specifically for their VASH program regardless of the minimum rent policies established in their administrative plan for other HCV families.

		PHA Policy The PHA will establish a minimum rent of $0 for VASH families.
19	19-III.E. Leasing; Exception Payment Standards	Language Updated: To assist VASH participants in finding affordable housing, especially in competitive markets, HUD **allows** PHAs to establish a HUD-VASH exception payment standard. PHAs **may go up to but no higher than 120 percent of the published metropolitan area-wide fair market rent (FMR)** or small area fair market rent (SAFMR) specifically for VASH families. PHAs who want to establish a VASH exception payment standard over 120 percent are allowed but must still request a waiver from HUD through the regular waiver process outlined in Notice PIH 2018-16, or any successor notices. Exception payment standards implemented by the PHA under this section also apply in determining rents under 24 CFR 983.301(b) for PBV projects only when the project is comprised solely of units exclusively made available to VASH families. The PHA may also establish an exception payment standard up to 140 percent of the published FMR or SAFMR only to be applied if required as a reasonable accommodation for a family that includes a person with a disability. Any unit approved under an exception payment standard must still meet reasonable rent requirements. The PHA may use a payment standard that is greater than 140 percent of FMR as a reasonable accommodation for a person with a disability, but only with HUD approval.
	19-III.E. Leasing; Special Housing Types	Language Added: The PHA must permit VASH clients to use the following special housing types for tenant-based VASH assistance, regardless of whether these types are permitted in their administrative plan for other families: • Single room occupancy (SRO); • Congregate housing; • Group home; • Shared housing; and • Cooperative housing.
	19-III.G. Termination of Assistance (VASH)	Language Updated: Prior to terminating VASH participants, HUD strongly encourages PHAs to exercise their discretion under 24 CFR

19		982.552(c)(2) as outlined in Section 12-II.D. of this policy and consider all relevant circumstances of the specific case. This includes granting reasonable accommodations for persons with disabilities, as well as considering the role of the case manager and the impact that ongoing case management services can have on mitigating the conditions that led to the potential termination. VASH participant families may not be terminated after admission for a circumstance or activities that occurred prior to admission and were known to the PHA but could not be considered at the time of admission due to VASH program requirements. The PHA may terminate the family's assistance only for program violations that occur after the family's admission to the program. There are two alternative requirements for termination of assistance for VASH participants. **Cessation of Case Management** As a condition of receiving HCV rental assistance, a HUD-VASH-eligible family must receive case management services from the VAMC or DSP. A VASH participant family's assistance must be terminated for failure to participate, without good cause, in case management as verified by the VAMC or DSP. However, the PHA may offer the family continued assistance through one of its regular vouchers or a PBV unit not exclusively made available for HUD-VASH. However, a VAMC or DSP determination that the participant family no longer requires case management is not grounds for termination of voucher or PBV assistance. In such a case, at its option, the PHA may offer the family continued assistance through one of its regular vouchers. The decision to transfer assistance to a regular voucher must consider veteran preference and must be communicated to the VA prior to occurring. If the PHA has no voucher to offer, the family will retain its VASH voucher, or PBV unit, until such time as the PHA has an available voucher (or PBV unit not exclusively made available for VASH) for the family. If the PHA has no voucher to offer, the family will retain its VASH voucher or PBV unit until such time as the PHA has an available voucher for the family. **Serious Violation of the Lease** The regulation at 24 CFR 982.552(b)(2) states that the PHA must terminate program assistance for a family evicted from housing assisted under the program for serious violation of

19		the lease. HUD waived this provision, and establishing the alternative requirement that the PHA may terminate program assistance in this case. Prior to terminating VASH participants for this reason, HUD strongly encourages PHAs to exercise their discretion under 24 CFR 982.552(c)(2) and consider all relevant circumstances of the specific case, as well as including the role of the case manager and the impact that ongoing case management services can have on mitigating the conditions that led to the potential termination, prior to determining whether to terminate assistance.
	19-III.H. Project-Basing VASH Vouchers; Ineligible Units	Language Added: Unlike in the regular PBV program, the PHA may opt to select an occupied unit or admit a family to a unit if such unit is made exclusively available to VASH families if the PBV project is either on the grounds of a VA facility or there are VASH supportive services provided on-site at the project.
	19-III.H. Project-Basing VASH Vouchers; Termination of Assistance	Language Added and New Policy: A VASH family's PBV assistance must be terminated for failure to participate in case management when required by the VA. However, the PHA may allow the veteran family to receive a regular (non-VASH) tenant-based voucher or PBV unit instead of the family's assistance being terminated. In this case, the PHA may: • Substitute the family's unit on the PBV HAP contract for another unit (the PHA may, in conjunction with such substitution, add the original unit to the PBV HAP contract with a non-VASH voucher if it is possible to do so; • Remove the unit from the PBV HAP contract so the family may remain with tenant-based assistance, if the family and the owner agree to use the tenant-based voucher in the unit; or • Change the unit's status in the PBV HAP contract from a unit exclusively made available for VASH to a regular PBV unit, if doing so is allowable under program rules. If the PHA will not allow the veteran to receive a regular (non-VASH) tenant-based voucher or PBV unit instead of the family's assistance being terminated, then upon notification by the VA of the family's failure to participate in VA-required case management, the PHA must provide the family a reasonable period of time (as established by the PHA) to vacate the unit.

19		PHA Policy If the family fails to participate in case management when required by the VA, the PHA will terminate the family's assistance. The family will have 120 days to vacate the unit. The PHA will terminate assistance to the family at the earlier of (1) the time the family vacates or (2) the expiration of the 120-day period. If the family fails to vacate the unit within the established time, the owner may evict the family. If the owner does not evict the family, the PHA will remove the unit from the HAP contract or amend the HAP contract to substitute a different unit in the project if the project is partially assisted. The PHA may add the removed unit back onto the HAP contract after the ineligible family vacates the property.
	19-III.H. Project-Basing VASH Vouchers; Moves	Language Added and New Policy: If a VASH family is eligible to move from its PBV unit after a year of PBV assistance, the PHA will generally follow policies in Chapter 17. However, if there is no VASH tenant-based voucher available at the time the family requests to move, the PHA's actions depend on whether the family still requires case management. • The PHA may require a family that still requires case management to wait for a VASH tenant-based voucher for a period not to exceed 180 days. If a HUD-VASH tenant-based voucher is still not available after 180 days, the family must be allowed to move using its VASH voucher as tenant-based assistance. Alternatively, the PHA may allow the family to move using its VASH voucher as tenant-based assistance without having to meet this 180-day waiting period. In either case, the PHA may either amend the PBV HAP contract to replace the assistance in the PBV unit with one of its regular vouchers if the unit is eligible for a regular PBV or the PHA and owner may agree to temporarily remove the unit from the HAP contract. • If a VASH veteran has been determined to no longer require case management, the PHA must allow the family to move with the first available tenant-based voucher. If no VASH voucher is immediately available, the PHA may not require the family to wait for a VASH voucher to become available.
	19-III.H. Project-Basing VASH Vouchers; Wrong-Sized or Accessible Units	Language Added: If the PHA determines that a VASH family is occupying a wrong-size PBV unit or a PBV unit with accessibility features that the family does not require and the PBV unit is needed by a family that requires the accessibility features,

		the PHA must notify the family and the owner within 30 days of the PHA's determination. The PHA's offer of continued housing assistance (that must be made within 60 days of the PHA's determination) must be in the form of either a VASH tenant-based voucher or another VASH PBV unit. If no VASH assistance is available for the PHA to offer within 60 days of the PHA's determination, the PHA must remove the wrong-sized or accessible unit from the HAP contract to make VASH voucher assistance available to the family.
19	19-III.H. Project-Basing VASH Vouchers; Contract Terminations	Language Added: The regulation at 24 CFR 983.206(b), which covers the required provision of tenant-based assistance and requires that the family may elect to use its tenant-based assistance to remain in the same project when a PBV HAP contract terminates or expires, does not apply to families issued a HUD-VASH tenant-based voucher under this circumstance. The PHA may use another voucher to add the unit removed under this alternative requirement to the HAP contract after the family vacates the property, in accordance with 24 CFR 983.207(b).
	19-III.H. Project-Basing VASH Vouchers; Rents	Language Added: Contract rents may not be different based on whether the unit is a VASH PBV unit or a non-VASH PBV unit. In determining the rent to owner for the PBV project, if the cap on the amount of rent to owner under 24 CFR 983.301(b)(1) is lower for non-HUD-VASH units than it is for the HUD-VASH units (e.g., the PHA has established a HUD-VASH exception payment standard and there is either no exception payment standard or a lower exception payment standard for the regular HCV program for the area in question), that lower cap is applicable when setting the rent to owner for the PBV units in the project, including the HUD-VASH units.
	19-III.H. Project-Basing VASH Vouchers; Removing Units from the HAP Contract for Ineligible Families	Language Added: The PHA and owner may also agree to temporarily remove a unit from the HAP contract in cases where a HUDVASH eligible veteran has been identified by the VA as appropriate for a VASH PBV unit, but the veteran is not income eligible to receive voucher assistance or may not be selected for the PBV unit because the family's TTP exceeds the gross rent of the unit. Although the family would not be a program participant in the housing portion of the VASH program in such a case, the family would still benefit from the project's location on the grounds of a VA facility or from the VASH supportive services on-site at the project, while the VASH voucher would be available to assist another VASH family. The PHA and owner may agree to add a

19		VASH voucher back onto the PBV HAP contract if the family's income subsequently decreased to the point that there would be a HAP or when the family vacates the unit.
	19-III.H. Project-Basing VASH Vouchers; Zero HAP Families	Language Added: Under normal PBV requirements, the PHA may select an occupied unit to be included under a PBV HAP contract only if the unit's occupants are eligible for assistance under 24 CFR 982.201, and the TTP for the family is less than the gross rent for the unit. Furthermore, in selecting a family for an available PBV unit, typically the PHA must determine the TTP for the family is less than the gross rent, meaning that the unit will be eligible for a monthly HAP. However, if the PBV project is either on the grounds of a VA facility or there are HUD-VASH supportive services provided onsite at the project, the PHA may opt to select a unit occupied by a zero HAP VASH eligible family or admit a zero HAP VASH family to a unit if such unit is made exclusively available to VASH families. Until such time that the VASH family's TTP falls below the gross rent, the family is responsible for paying the entire rent to owner in addition to being responsible for paying all tenant-supplied utilities. During any period that the family's TTP falls below the gross rent, normal PBV requirements apply. Further, under normally applicable rules, units occupied by families whose incomes have increased during their tenancy resulting in their TTP equaling the gross rent (zero HAP) must be removed from the HAP contract 180 days following the last housing assistance payment to the owner on the family's behalf. These regulations do not apply to zero HAP families admitted to the PBV project under this waiver and alternative requirement because there is no last housing assistance payment that would trigger the unit removal date of 180 days. As an alternative requirement, PHAs have the option of removing the unit in which the zero HAP family resides from the HAP contract, but no earlier than 180 days from the start of the family PBV tenancy. If the PHA exercises this option, the family may not be required to move from the unit as a consequence and continues to receive the VASH supportive services. If the project is fully assisted, the PHA may reinstate the unit removed to the HAP contract after the family either vacates the unit or their income decreases to the point that there would be a HAP. If the project is partially assisted, the PHA may substitute a different unit for the unit removed from the HAP contact when the first eligible substitute unit becomes available. Alternatively, the PHA may choose to simply leave the unit on the HAP contract while the zero HAP family continues to reside there.

19	19-III.H. Project-Basing VASH Vouchers; Proposal/ Project Selection	Language Added: PBV proposal and/or project selection for VASH must follow all regular proposal and/or project selection regulations, with one exception. HUD permits noncompetitive selection of one or more PBV projects with units made exclusively available to VASH families on the site of a VA facility. Note that the method of project selection must comply with all other requirements under 24 CFR 983.51, including that the PHA must notify the public of its intent to noncompetitively select one or more projects for PBV assistance through its 5-Year Plan and to ensure any project selection is consistent with the PHA administrative plan.
	19-III.H. Project-Basing VASH Vouchers; Failure to Participate in Case Management	Language Added and New Policy: Upon notification by the VAMC or DSP of the family's failure to participate, without good cause, in case management, the PHA must provide the family a reasonable time period to vacate the unit. The PHA must terminate assistance to the family at the earlier of either the time the family vacates or the expiration of the reasonable time period given to vacate. PHA Policy Upon notification by the VAMC or DSP that a VASH PBV family has failed to participate in case management without good cause, the PHA will provide written notice of termination of assistance to the family and the owner within 10 business days. The family will be given 60 days from the date of the notice to move out of the unit. The PHA may make exceptions to this 60-day period if needed for reasons beyond the family's control such as death, serious illness, or other medical emergency of a family member. If the family fails to vacate the unit within the established time, the owner may evict the family. If the owner does not evict the family, the PHA must remove the unit from the HAP contract or amend the HAP contract to substitute a different unit in the project if the project is partially assisted. The PHA may add the removed unit to the HAP contract after the ineligible family vacates the property.
	19-IV.E. Preferences (Mainstream)	Language Added: While PHAs may establish local preferences based on local housing needs and priorities in accordance with 24 CFR 982.207(a), HCV regulations do not permit PHAs to establish separate preferences for Mainstream voucher applicants. HUD waived 24 CFR 982.207(a)(1) and allows PHAs to establish separate preferences for Mainstream

19		voucher applicants. However, PHAs may not apply a residency preference to Mainstream voucher applicants. PHAs with outstanding Olmstead-related litigation or enforcement activities, as well as those undertaking affirmative Olmstead planning and implementation efforts, who wish to establish preferences that target individuals with specific disabilities must request HUD approval. The process for requesting approval for a remedial preference targeting individuals with specific disabilities is outlined in Notice PIH 2012-31. Regardless of whether a PHA chooses to adopt separate Mainstream voucher preferences, if the PHA claimed points for a preference in a NOFO application for Mainstream vouchers, the PHA must adopt a preference for at least one of the targeted groups identified in the NOFO. PHAs may choose to apply NOFO preferences to the entire HCV waiting list or only to Mainstream voucher applicants as a separate Mainstream voucher preference. PHAs may use either date and time of application or a drawing or other random choice technique in selecting families from the Mainstream waiting list among applicants with the same preference status in accordance with the PHA's administrative plan. PHA Policy The PHA does not offer preferences to Mainstream applicants on its waitlist. However, 2/3 of the Mainstream vouchers will be filled by referral from DHHS.
	19-IV.F. Voucher Issuance (Mainstream); Initial Search Term	Language Updated: For Mainstream vouchers, HUD waived 24 CFR 982.303(a), which requires an initial search term of at least 60 days, and established an alternative requirement that **the initial search term for a Mainstream voucher be at least 120 days**. The initial 120-day term also applies when a family chooses to move to a new unit with continued assistance inside or outside the PHA's jurisdiction. When issuing a Mainstream voucher, the PHA also must provide a current listing of available accessible units known to the PHA and, if necessary, otherwise assist the family in identifying an accessible unit. PHA Policy The initial voucher term for all Mainstream vouchers, including those issued when a family wishes to exercise portability, will be 120 days.

19	19-IV.F. Voucher Issuance (Mainstream); Voucher Extension	Language Added and New Policy: The PHA's administrative plan must describe the PHA's policies for granting extensions to the initial 120-day voucher term and provide clear instructions to families on the procedures for requesting an extension. If a family requires additional time, the PHA is required to provide an extension as a reasonable accommodation. PHAs must adopt an extension policy for Mainstream vouchers that includes the following: • Each extension must be for a minimum of 90 days; • The PHA must approve the first extension request, regardless of how the request is made (written or verbal) or when it is made, as long as the request is made on or before the expiration date of the voucher and is consistent with applicable requirements (subsequent requests should be processed in accordance with the PHA's administrative plan); and • The PHA must, on at least one occasion after voucher issuance, notify the family prior to the expiration of the initial term to remind them of the expiration date, the process for requesting an extension, and to inquire if the family is in need of assistance with their housing search. As part of its search extension policy, the PHA may not restrict a first extension approval to certain circumstances or require documentation from applicants. For all extension requests, a written or verbal request is sufficient. In providing notice to families of the expiration date and extension request process, PHAs must ensure effective communication with persons with disabilities, including those with vision, hearing, speech, intellectual or other developmental disabilities, or any other communication-related disabilities. PHAs must approve all extensions made as a reasonable accommodation, and PHAs must provide this information during the family briefing. PHA Policy At least 30 days prior to the expiration of the initial term of the voucher, the PHA will contact the family to remind them of the expiration date of their voucher, the process for requesting an extension, and to inquire if the family needs assistance with their housing search. Depending on the family's preferred method of communication, the PHA may contact the family via telephone, text message, email, or other accessible communication method. The PHA will ensure effective communication with persons with disabilities, including those with vision, hearing, speech,

19		intellectual or other developmental disabilities, or any other communication-related disabilities. Families may request an extension, either orally or in writing, at any time prior to the expiration of the family's voucher. All requests for extensions will automatically be granted without the requirement for the family to provide documentation. The initial extension period will be for 90 days. If the family requires additional extensions beyond 90 days, the family may request additional extensions, either orally or in writing, at any time prior to the expiration of the extended voucher term. All subsequent extensions will also be for a period of 90 days and will not require the family to meet certain circumstances or provide documentation. Each time the family requests an extension, the PHA will inquire if the family needs assistance with their housing search and will provide a current listing of available accessible units known to the PHA.
Glossary	Acronyms Used	Language Added: **AHAP** Agreement to enter into a HAP Contract **CoC** Continuum of Care **CPD** Community Planning and Development (HUD Office of) **ELI** Extremely Low-Income **EHV** Emergency Housing Voucher **EV** Enhanced Voucher **FUP** Family Unification Program **FYI** Foster Youth to Independence **HEA** Higher Education Act **HOME** Home Investment Partnership Program **HOPWA** Housing Opportunities for Persons with AIDS (Program) **IMS/PIC** Inventory Management System/PIH Information Center **LIHTC** Low-Income Housing Tax Credit **NED** Non-Elderly Disabled **SAFMR** Small Area Fair Market Rent **SAVE** Systemic Alien Verification for Entitlements **VASH** Veterans Affairs Supportive Housing

HOUSING AUTHORITY OF THE COUNTY OF HUMBODLT

RESOLUTION 527

Resolution Approving and Adopting Updates to the Housing Authority of the County of Humboldt Housing Choice Voucher Program Administrative Plan

WHEREAS, It is a requirement of the Housing Authority of the County of Humboldt to have an updated, approved Administrative Plan for the administration of its Housing Choice Voucher programs; and

WHEREAS, Staff has amended the current Administrative Plan to include Housing Opportunity Through Modernization Act (HOTMA) updates; and

WHEREAS, The Commissioners have reviewed the proposed HOTMA updates to the Administrative Plan; and

WHEREAS, The proposed addition was advertised and made available for forty-five (45) days of public comment, with a public comment meeting held on Tuesday, September 1, 2026, via conference call; and

WHEREAS, There were no public comments received; and

WHEREAS, The approved, updated Administrative Plan will be sent to HUD for their reference; and

WHEREAS, The updated Administrative Plan will be implemented immediately as applicable; and

NOW, THEREFORE, BE IT RESOLVED, That the Commissioners of the Housing Authority of the County of Humboldt do hereby approve and adopt the proposed changes to the Administrative Plan for Housing Opportunity Through Modernization Act updates.

PASSED AND ADOPTED on the _________ day of_______________ 2026 by the following vote:

AYES:
NAYS:
ABSENT:
ABSTAIN:

___________________________	___________________________
Name	Name
___________________________	___________________________
Title	Title
___________________________	___________________________
Signature	Signature

Housing Authority of the County of Humboldt

Board of Commissioners Meeting

September 14, 2026

Agenda Item 8b

Memorandum

To: Commissioners
From: Cheryl Churchill, Executive Director
Subject: Annual Agency Plan Updates

BACKGROUND AND HISTORY:

As required by HUD, the Housing Authority must annually update the PHA Plan.

The resident advisory board met at the Housing Authority office on June 5 2026, to discuss the PHA goals and objectives and provide input to the annual plan. A public hearing was held on September 1, 2026, to receive comments on the plan; no comments were received.

The Board has had an opportunity to review goals and progress updates, and to offer input at regularly scheduled board meetings relative to the annual plan.

The PHA Plan must be submitted to HUD by October 15, 2026.

FINANCIAL IMPACT:

None noted.

IMPACT TO PERSONNEL:

In-house departmental trainings as well as professional webinar trainings will continue as needed.

STAFF RECOMMENDATION:

Staff recommend that the Board approve and adopt the updated agency annual plan.

Streamlined Annual PHA Plan *(HCV Only PHAs)*	**U.S. Department of Housing and Urban Development Office of Public and Indian Housing**	**OMB No. 2577-0226 Expires: 09/30/2027**

Purpose. The 5-Year and Annual PHA Plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services. They also inform HUD, families served by the PHA, and members of the public of the PHA's mission, goals, and objectives for serving the needs of low-, very low-, and extremely low- income families.

Applicability. The Form HUD-50075-HCV is to be completed annually by **HCV-Only PHAs**. PHAs that meet the definition of a Standard PHA, Troubled PHA, High Performer PHA, Small PHA, or Qualified PHA do not need to submit this form. Where applicable, separate Annual PHA Plan forms are available for each of these types of PHAs.

Definitions.

(1) ***High-Performer PHA*** – A PHA that owns or manages more than 550 combined public housing units and housing choice vouchers (HCVs) and was designated as a high performer on both the most recent Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) assessments if administering both programs, SEMAP for PHAs that only administer tenant-based assistance and/or project-based assistance, or PHAS if only administering public housing.
(2) ***Small PHA*** - A PHA that is not designated as PHAS or SEMAP troubled, that owns or manages less than 250 public housing units and any number of vouchers where the total combined units exceed 550.
(3) ***Housing Choice Voucher (HCV) Only PHA*** - A PHA that administers more than 550 HCVs, was not designated as troubled in its most recent SEMAP assessment and does not own or manage public housing.
(4) ***Standard PHA*** - A PHA that owns or manages 250 or more public housing units and any number of vouchers where the total combined units exceed 550, and that was designated as a standard performer in the most recent PHAS and SEMAP assessments.
(5) ***Troubled PHA*** - A PHA that achieves an overall PHAS or SEMAP score of less than 60 percent.
(6) ***Qualified PHA*** - A PHA with 550 or fewer public housing dwelling units and/or HCVs combined and is not PHAS or SEMAP troubled.

A.	PHA Information.
A.1	**PHA Name**: Housing Authority of the County of Humboldt **PHA Code**: CA086 **PHA Plan for Fiscal Year Beginning**: (MM/YYYY): 01/2027 **PHA Inventory** (Based on Annual Contributions Contract (ACC) units at time of FY beginning, above) **Number of Housing Choice Vouchers (HCVs)** 1409 (1234 HCV + 100 VASH + 75 Mainstream) **PHA Plan Submission Type:** ☑ Annual Submission ☐ Revised Annual Submission **Public Availability of Information.** In addition to the items listed in this form, PHAs must have the elements listed below readily available to the public. A PHA must identify the specific location(s) where the proposed PHA Plan, PHA Plan Elements, and all information relevant to the public hearing and proposed PHA Plan are available for inspection by the public. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA and should make documents available electronically for public inspection upon request. PHAs are strongly encouraged to post complete PHA Plans on their official websites and to provide each resident council with a copy of their PHA Plans. PHA Plans are available on website at https://eurekahumboldtha.org/governance/ and via hardcopy in PHA office at 735 West Everding Street, Eureka, CA 95503.

☐ **PHA Consortia**: (Check box if submitting a joint Plan and complete table below)

Participating PHAs	PHA Code	Program(s) in the Consortia	Program(s) not in the Consortia	No. of Units in Each Program
Lead HA:				

B. Plan Elements.

B.1 Revision of Existing PHA Plan Elements.

a) Have the following PHA Plan elements been revised by the PHA since its last Annual Plan submission?

Y N
☐ ☑ Statement of Housing Needs and Strategy for Addressing Housing Needs.
☑ ☐ Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.
☑ ☐ Financial Resources.
☐ ☑ Rent Determination.
☑ ☐ Operation and Management.
☐ ☑ Informal Review and Hearing Procedures.
☐ ☑ Homeownership Programs.
☐ ☑ Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.
☐ ☑ Substantial Deviation.
☐ ☑ Significant Amendment/Modification.

(b) If the PHA answered yes for any element, describe the revisions for each element(s):

See attachment "B1. Revision of Existing PHA Plan Elements"

B1. Revision of Existing PHA Plan Elements

Below are details related to B.1 plan elements that have been revised by the PHA since its last Annual Plan submission.

Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions

The Housing Authority of the County of Humboldt (HACH) has updated its preferences.

- The PHA will offer a preference to any family that has been terminated from its HCV program due to insufficient program funding. The PHA will verify this preference using the PHA's termination records.
- The PHA also offers a preference to families that include victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking who are seeking an emergency transfer under VAWA from the PHA's public housing program or other covered housing program operated by the PHA (as described in Section 4-III.C). To verify that applicants qualify for the preference, the PHA will review internal agency records and follow documentation requirements outlined in Section 16-IX.D.
- The PHA offers a preference for public housing residents who will be displaced due to HUD-approved repositioning activities. The PHA will verify this preference using PHA records from the Housing Authority of the City of Eureka.
- The PHA offers a preference for EHV clients whose funding has expired or is about to expire. The PHA will verify this preference using the PHA's internal participant records.
- The PHA offers a moving-on preference, and verification of eligibility and preference status will be included with referral for voucher from the CoC participating agency.

HACH also administers site-based waiting lists for each PBV assisted project.

B1. Revision of Existing PHA Plan Elements (continued)

Financial Resources

HACH was notified that its Housing Choice Voucher (HCV) and Mainstream Voucher (MSV) programs were in shortfall during 2025 and have just exited shortfall in June 2026. In response, HACH has implemented HUD-required cost-saving measures, including a suspension of general HCV voucher issuance, with specific exclusions as permitted by HUD. To prevent excessive growth of the waiting list and unreasonably long wait times for assistance, HACH closed its HCV waiting list on March 28, 2025. HACH will cautiously issue vouchers as allowed, balancing funding availability with increasing program utilization. HACE will convert EHV participants to HCV assistance over time, balancing maximizing use of remaining EHV funding with retaining assistance for eligible EHV participants. Based on a 9/2026 analysis considering HCV funding and voucher utilization, all current EHV participants should be able to be converted to HCV assistance by the end of 2027.

Operation and Management

HACH will continue to pursue opportunities to utilize Project-Based Vouchers (PBVs), as funding allows, to support the development and preservation of affordable housing. Additionally, HACH has entered into a Memorandum of Understanding (MOU) with the County of Humboldt's Department of Health and Human Services (DHHS) to implement a Foster Youth to Independence (FYI) voucher program. HACH has 3 FYI vouchers and will continue requesting more as referrals are provided, subject to HUD funding/availability. FYI vouchers are separate from the HCV and MSV programs and are not subject to shortfall cost-saving measures.

Note that HACH intends to noncompetitively select one or more projects for PBV assistance. This includes public housing redevelopment for the Housing Authority of the City of Eureka as well as projects that have gone through other eligibility events or competitive processes within 5 years of the project selection date.

B.2	**New Activities.** (a) Does the PHA intend to undertake any new activities related to the following in the PHA's applicable Fiscal Year? Y N ☑ ☐ Project-Based Vouchers (b) If Project-Based Voucher (PBV) activities are planned for the applicable Fiscal Year, provide the projected number of PBV units and general locations, and describe how project-basing would be consistent with the PHA Plan. AHAP with Linc Housing - 25 vouchers, planned lease-up at end of 2026 or Q1-2027. TPV to PBV related to Housing Authority of the City of Eureka's ("HACE") public housing repositioning: A request for TPVs has been submitted corresponding to HACE's redevelopment and rehabilitation of 124 public housing units. HACH will administer vouchers related to these efforts, and convert TPVs to PBVs as well as allocate additional vouchers (64) to be project based to support the development and ongoing operations of HACE housing projects in Eureka. Note that HACH intends to noncompetitively select one or more projects for PBV assistance. This includes public housing redevelopment for the Housing Authority of the City of Eureka as well as projects that have gone through other eligibility events or competitive processes within 5 years of the project selection date.
B.3	**Progress Report.** Provide a description of the PHA's progress in meeting its Mission and Goals described in its 5-Year PHA Plan. See attached "PHA 5-Year Plan Goals Progress Report".

B.4	**Capital Improvements. –** Not Applicable
B.5	**Most Recent Fiscal Year Audit.** (a) Were there any findings in the most recent FY Audit? Y N N/A ☑ ☐ ☐ (b) If yes, please describe: HQS deficiencies were not reinspected within the allotted amount of time. A corrective action plan (attached) has been put in place to address the issue identified.
C.	**Other Document and/or Certification Requirements.**
C.1	**Resident Advisory Board (RAB) Comments.** (a) Did the RAB(s) have comments to the PHA Plan? Y N ☑ ☐ (b) If yes, comments must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the RAB recommendations and the decisions made on these recommendations. See attached summary of RAB meeting held 6/5/2026.

C.2	**Certification by State or Local Officials.** Form HUD 50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan,* must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.3	**Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed,* must be submitted by the PHA as an electronic attachment to the PHA Plan.
C.4	**Challenged Elements.** If any element of the PHA Plan is challenged, a PHA must include such information as an attachment with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public. (a) Did the public challenge any elements of the Plan? Y N ☐ ☑ (b) If yes, include Challenged Elements.

PHA 5-Year Plan Goals

Housing Authority of the County of Humboldt

2026-2030 Goals and 2027 Update

Goal One: **Maximize Voucher Utilization**

The Housing Authority of the County of Humboldt ("The PHA") makes every effort to utilize up to 100% of the Annual Contributions Contract, or more as allowed based on draws of HUD-held reserves.

To achieve this, the PHA shall maintain a waiting list of size sufficient to issue vouchers and lease-up clients to utilize at least 96% of our Annual Contributions Contract funding. The PHA will advertise in at least one local publication quarterly, *as long as the wait list is open*, in order to make the public aware of our open waitlist. Additionally, the PHA will seek opportunities with other local agencies to do outreach and education about our housing programs to diverse populations, at minimum once a month, with the goal of furthering voucher utilization.

HCV voucher issuance has been unallowed for the first half of 2026, due to HUD's assessment that the PHA was at risk of shortfall. Average expenditure of HAP funding for Q1-Q2 is 98% of monthly funding. Community outreach efforts have been focused on responding to specific requests for education and information, versus promotion of the voucher program.

Goal Two: **Increase Landlord Participation**

When adequate funding is available, the PHA will offer landlord incentives in order to bring in new landlords and/or new units to the HCV program. Additionally, the PHA will continue to enhance and encourage communication with landlords via periodic newsletters, and work to maintain regular contact with landlords via outreach and education that promotes the participation of rental property owners in Humboldt's voucher assistance payment program.

1. Landlord Newsletter will go out at minimum once a year.
2. A landlord orientation and/or appreciation event will be held at least once annually to acknowledge the landlords' critical role, share client success stories that promote the program, and educate current and prospective landlords about the HCV program.
3. An annual landlord survey will be done via USPS mail with an online response option, seeking input/feedback from landlords.

Any relevant feedback will be used to inform changes to operations.

2026 Update: Two landlord newsletters were sent in 2025, and one landlord newsletter was sent in February 2026. The Housing Advocate maintains contact with and reaches out to landlords as needed to support clients seeking housing. The annual landlord luncheon is planned for August, and the annual landlord survey will be sent out after the luncheon.

Goal Three: **Utilize Project Based Vouchers to Expand the Supply of Assisted Housing**

The PHA's Project Based Voucher (PBV) program will continue to seek opportunities to release further PBV's to the community (pending approval from HUD to seek higher voucher utilization) and partner with local agencies and/or developers to allocate PBV's that increase affordable housing units in Humboldt County. RFPs will be published as needed and when determined to be consistent with the financial and programmatic goals of the agency.

The PHA may administer vouchers for the City of Eureka Housing Authority ("City") in support of the City's repositioning of its Public Housing stock and retaining or increasing affordable units. A resolution of support for the City of Eureka Housing Authority's Repositioning Plan was approved at a regularly scheduled board meeting on July 11, 2022.

2026 Update: No new PBVs were issued in 2025 or to date in 2026. The PBV program currently sits at 120 units across 5 projects in Eureka and Arcata. An AHAP was completed in March 2025 to assist 25 units with PBVs at Linc Housing's new construction buildings in Eureka, expected to lease-up Q4-2026, increasing active PBVs to 145 by year end. Additionally, the PHA will administer PBVs for the Housing Authority of the City of Eureka related to Public Housing repositioning efforts. The AHAP for these will be completed in 2026, with the expected utilization of 141 PBVs starting in 2028.

Goal Four: **HUD Performance Evaluation & Quality of Assistance**

In its last scored year for SEMAP (based on 2024 operations), the PHA scored a SEMAP rating of High Performer. The PHA aims to continue receiving the highest possible score under Section 8 Management Assessment Program (SEMAP) and strives to maintain "High Performer" status.

1. The PHA will continue to perform quality control checks on tenant files, income calculations, and inspections.

2. Upon receipt of HUD certified SEMAP scoring, results will be presented to the Board of Commissioners.
3. For any score less than “High Performer” a remediation plan will be implemented and presented with the scoring.

2025 Update: Quality control file checks and inspections continue to occur periodically. SEMAP score for FYE 12/31/2024 earned a High Performer designation for Humboldt PHA.

Goal Five: **Compliance**

Management will periodically review internal controls to verify appropriate policies and procedures remain in place, up to date, and operating effectively. The PHA will ensure full compliance with all applicable standards and regulations including generally accepted accounting practices (GAAP) and governmental accounting standards board (GASB), with a goal of zero findings in annual audits, with audit report, including any findings, to be made available and presented annually.

1. Completed audit for FYx1 will be presented at a regular board of commissioners’ meeting before the end of FYx2.
2. Completed audit report will be posted on agency website.

2025 Update: 2024 Audit in process. 2023 Audit had no findings and was presented to the board at a normally scheduled meeting.

Goal Six: **Employee Morale**

The PHA will promote and maintain a motivating work environment that attracts highly talented applicants and acknowledges a capable team of employees.

1. Budget will be allocated, approved and available to send appropriate staff to training seminars that will allow employees to gain new knowledge and/or enhance staff skills for their particular job classification and responsibilities.
2. On-demand training will be available to all staff and periodically assigned by management through a contract with Yardi.
3. Management will review training progress quarterly to identify possible opportunities for training that align with agency needs and support gaps in employee skills or knowledge.
4. The PHA will acknowledge staff monthly for their achievements by providing an employee recognition award to an employee selected by the management team.

2025 Update: Staff training budget is being utilized to further staff education around housing-related topics and earn certifications in HUD specific areas of expertise (e.g. HCV Income Calculation Certification). Yardi Aspire on-demand training continues to be used for internal training assignments and at-will by staff. Management reviews training budget utilization monthly and recognizes an employee of the month every month.

Goal Seven: **Technology and Accessibility**

The PHA will add to our selection of resources available online in order to remove barriers to accessibility, better meet our client's needs to access and complete paperwork remotely, and offer multiple methods to successfully communicate with agency staff.

We will periodically assess the need to add data to the website. The following documents will be available online, at a minimum:

1. Application
2. Notice of Change
3. Recertification paperwork
4. Board meeting agendas
5. Administrative Plan
6. PHA Plan

2025 Update: In addition to providing regular website updates, a computer room with a printer available to clients for printing bank statements and other verification paperwork necessary for Housing Authority programs continues to be available. This information is also on the Housing Authority website.

Goal Eight: **Mainstream Vouchers**

The Mainstream Vouchers program was added in 2020 to bring more opportunity to the disabled community. A limited preference was added which allows for voucher placement based on referrals from Continuum of Care participating agencies for up to 50 active vouchers for people/families who are non-elderly, disabled, formerly homeless and participating in a Permanent Supportive Housing or Rapid Re-Housing program.

Per HUD's program requirements, the PHA aims to have at least 80% of these vouchers leased annually. This will be accomplished by:

1. Monthly or more frequent (as needed) meetings and communications with partner agencies to discuss, review and encourage referrals;
2. Housing Advocate working as liaison between the PHA and partner agencies to facilitate completion of paperwork, education of social workers and program participants, and continued outreach to landlords to add new units/landlords; and

3. Regularly pulling eligible applicants from the waitlist for screening/briefing and issuance of vouchers.

2025 Update: As of 6/3/2025, over 94% of Mainstream vouchers are leased up. We will continue issuing vouchers and accepting referrals to get to 100%, at which point vouchers will be issued only when turnover happens, or if new vouchers are added.

Goal Nine: **Emergency Housing Vouchers**

The Emergency Housing Vouchers (EHV) program was added in 2021 to bring more opportunity to community members most affected by the COVID-19 pandemic. This program requires that referrals for the 182 vouchers be made from the local Continuum of Care, Humboldt Housing and Homeless Coalition (HHHC), or by a domestic violence service provider, Humboldt Domestic Violence Services (HDVS), to the PHA, for voucher issuance. A dedicated EHV Housing Specialist works with the clients and referring partners to process paperwork, help find potential housing, make referrals to other agencies for supportive services, and generally support the success of the client in the EHV program. Vouchers may be issued until 9/30/2023. Thereafter, turnover EHVs can no longer be issued.

2025 Update: All 182 EHVs were issued by 9/30/2023, and PHA has met the original goal of 80% utilization of EHVs. Because future funding for the EHV program has been shortened from a 2030 sunset to 2026, PHA will be communicating with landlords to encourage tenant retention however possible. PHA will consider implementing a preference to convert EHV participants to HCV when vouchers may be issued again.

Goal Ten **Customer Feedback**

In order to provide for continuous improvement, the PHA will use various methods to invite feedback from interested parties, including voucher clients, landlords, community members, and staff.

We will provide an annual survey to clients to ask for their feedback and input on specific areas of focus.

We will implement a standard feedback process for any parties concerned for reporting issues, suggesting changes, and otherwise seeking answers.

2025 Update: An online survey will be emailed to voucher clients. Responses will be collected and shared at a future date.

Goal Eleven **<u>Information Sharing</u>**

We will actively identify and pursue opportunities to provide timely, accurate, and relevant information to the public, our clients, and to social service agencies working within the housing sector, fostering collaboration, increasing access to resources, and supporting informed decision-making that improves housing stability and outcomes.

2026 Update: BOS Meeting; RAB suggestion to provide list of subsidized housing resources in Humboldt

735 WEST EVERDING STREET, EUREKA CA 95503
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Housing Authority of the County of Humboldt (CA086)
Corrective Action Plan (CAP)

Finding #2025-001

Finding Description:
For units under HAP contract that fail to meet HQS, if the reported deficiency is life-threatening (LT), the PHA must, within 24 hours of notification, both inspect the housing unit and notify the owner if the life-threatening deficiency is confirmed. The owner must then make the repairs within 24 hours of PHA notification. If the reported deficiency is non-life-threatening (NLT), the PHA must, within 15 days of notification, both inspect the unit and notify the owner if the deficiency is confirmed. The owner must then make the repairs within 30 days of notification from the PHA or within any PHA approved extension. (24 CFR section 982.405(d)). If the owner does not correct the cited HQS deficiencies within the specified correction period, the PHA must stop (abate) HAPs beginning no later than the first of the month following the specified correction period or must terminate the HAP Contract.

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1. Tracking Deficiencies

The Housing Authority will use its ERP system, Yardi, for tracking all failed inspections. The system will have record of all relevant inspection-related information, and inspection staff will update the log on the same day that deficiencies are identified and as corrections and follow-up inspections are completed. Management will review the log regularly to monitor outstanding deficiencies, ensure timely corrective action, and verify compliance with required deadlines.

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2. Notification Procedures

For a 24-hour correctable deficiency resulting in a failed inspection, the tenant and landlord (if present) will be notified at the time of inspection, and both will receive follow up notice via email or phone immediately thereafter. Where notification is made via phone, a note will be made on the inspection booklet recording the time and details of the conversation. A letter summarizing the conversation will be sent to tenant and/or landlord as applicable.

For deficiencies with longer correction times (e.g. 30 days), notification will be sent to the tenant and landlord within 5 business days of the inspection. Notification will include relevant information, including the deficiency identified, the required timeframe for correction, the party responsible for correcting the violation, and potential consequences for failure to complete the required repairs or corrections.

Management will periodically review documentation to ensure notifications are completed timely and in accordance with Housing Authority policy and HUD requirements.

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3. Management Oversight

Management will monitor all open deficiencies to ensure that required notices are issued within required timeframes, corrections are completed and verified timely, and appropriate follow-up actions are taken when repairs or corrections are not completed as required. If deficiencies are not corrected within the required timeframe, the Housing Authority will take appropriate enforcement action in accordance with program requirements and applicable regulations, including HAP abatement and termination of tenant assistance, if required. In addition, failure by staff to complete required inspection and follow-up responsibilities will be reported to executive management for corrective action to ensure continued compliance and accountability.

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4. Verification of Corrections

All remediation of deficiencies must be verified before the deficiency is considered corrected and closed. Verification may include:

- Reinspection conducted by Housing Authority staff, with dates of correction documented;
- Remote video inspection, if it is feasible to discern whether the deficiency was adequately cured; or
- Photographs clearly documenting completed repairs or corrections

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5. Staff Training

Inspection and program staff will receive training on:

- HUD inspection requirements;
- Identification of life-threatening and 24-hour deficiencies;
- Required correction and verification timelines; and
- Documentation and recordkeeping procedures.

Expected Outcome

Implementation of this Corrective Action Plan (CAP) will improve the Housing Authority's processes for tracking, monitoring, documenting, and verifying the correction of inspection deficiencies. These procedures are intended to strengthen compliance with HUD requirements, improve accountability, ensure timely corrective action, and support the health and safety of residents.

Anticipated Completion Date: Corrective actions are currently in process and monitored regularly. All staff will complete training no later than December 31, 2026.

Contact Person: Cheryl Churchill, Executive Director
735 West Everding Street, Eureka, CA 95503
707.443.4583

Contact Person Signature: Cheryl Churchill

Instructions for Preparation of Form HUD-50075-HCVAnnual PHA Plan for HCV-Only PHAs

A. PHA Information. All PHAs must complete this section (24 CFR 903.4).

A.1 Include the full **PHA Name**, **PHA Code**, **PHA Type**, **PHA Fiscal Year Beginning** (MM/YYYY), **Number of Housing Choice Vouchers (HCVs), PHA Plan Submission Type**, and the **Public Availability of Information**, specific location(s) of all information relevant to the public hearing and proposed PHA Plan. Note: The number of HCV's should include all special purpose vouchers (e.g. Mainstream Vouchers, etc.) (24 CFR 903.23(e)).

PHA Consortia: Check box if submitting a Joint PHA Plan and complete the table (24 CFR 943.128(a)).

B. Plan Elements. All PHAs must complete this section (24 CFR 903.11(c)(3)).

B.1 Revision of Existing PHA Plan Elements. PHAs must:

Identify specifically which plan elements listed below that have been revised by the PHA. To specify which elements have been revised, mark the "yes" box. If an element has not been revised, mark "no."

☐ **Statement of Housing Needs and Strategy for Addressing Housing Needs.** Provide a statement addressing the housing needs of low-income, very low-income and extremely low-income families and a brief description of the PHA's strategy for addressing the housing needs of families who reside in the jurisdiction served by the PHA and other families who are on the Section 8 tenant-based assistance waiting lists. The statement must identify the housing needs of (i) families with incomes below 30 percent of area median income (extremely low-income); (ii) elderly families (iii) households with individuals with disabilities, and households of various races and ethnic groups residing in the jurisdiction or on the public housing and Section 8 tenant-based assistance waiting lists based on information provided by the applicable Consolidated Plan, information provided by HUD, and generally available data. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. (24 CFR 903.7(a)(2)(i)). Provide a description of the ways in which the PHA intends, to the maximum extent practicable, to address those housing needs in the upcoming year and the PHA's reasons for choosing its strategy (24 CFR 903.7(a)(2)(ii)).

☐ **Deconcentration and Other Policies that Govern Eligibility, Selection, and Admissions.** A statement of the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for HCV (24 CFR 903.7(b)).

☐ **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA HCV funding and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program and state the planned use for the resources (24 CFR 903.7(c)).

☐ **Rent Determination.** A statement of the policies of the PHA governing rental contributions of families receiving tenant-based assistance, discretionary minimum tenant rents, and payment standard policies (24 CFR 903.7(d)).

☐ **Operation and Management.** A statement that includes a description of PHA management organization, and a listing of the programs administered by the PHA (24 CFR 903.7(e)).

☐ **Informal Review and Hearing Procedures.** A description of the informal hearing and review procedures that the PHA makes available to its applicants (24 CFR 903.7(f)).

☐ **Homeownership Programs**. A statement describing any homeownership programs (including project number and unit count) administered by the agency under section 8y of the 1937 Act, or for which the PHA has applied or will apply for approval (24 CFR 903.7(k)).

☐ **Self Sufficiency Programs and Treatment of Income Changes Resulting from Welfare Program Requirements.** A description of any PHA programs relating to services and amenities coordinated, promoted, or provided by the PHA for assisted families, including those resulting from the PHA's partnership with other entities, for the enhancement of the economic and social self-sufficiency of assisted families, including programs provided or offered as a result of the PHA's partnerships with other entities, and activities subject to Section 3 of the Housing and Community Development Act of 1968 (24 CFR Part 135) and under requirements for the Family Self-Sufficiency Program and others. Include the program's size (including required and actual size of the FSS program) and means of allocating assistance to households. (24 CFR 903.7(l)(i)) Describe how the PHA will comply with the requirements of section 12(c) and (d) of the 1937 Act that relate to treatment of income changes resulting from welfare program requirements (24 CFR 903.7(l)(iii)).

☐ **Substantial Deviation.** PHA must provide its criteria for determining a "substantial deviation" to its 5-Year Plan (24 CFR 903.7(s)(2)(i)).

☐ **Significant Amendment/Modification**. PHA must provide its criteria for determining a "Significant Amendment or Modification" to its 5-Year and Annual Plan (24 CFR 903.7(s)(2)(ii)).

If any boxes are marked "yes", describe the revision(s) to those element(s) in the space provided.

B.2 New Activities. If the PHA intends to undertake any new activities related to these elements in the applicable Fiscal Year, mark "yes" for those elements, and describe the activities to be undertaken in the space provided. If the PHA does not plan to undertake these activities, mark "no."

☒ **Project-Based Vouchers.** Describe any plans to use HCVs for new project-based vouchers, which must comply with PBV goals, civil rights requirements, Housing Quality Standards (HQS) and deconcentration standards, as stated in 24 CFR 983.55(b)(1) and set forth in the PHA Plan statement of deconcentration and other policies that govern eligibility, selection, and admissions. If using project-based vouchers, provide the projected number of project-based units and general locations (including if PBV units are planned on any former or current public housing units or sites), and describe how project-basing would be consistent with the PHA Plan (24 CFR 903.7(b)(3), 24 CFR 903.7(r).)

B.3 Progress Report. For all Annual Plans following submission of the first Annual Plan, a PHA must include a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year PHA Plan (24 CFR 903.11(c)(3), 24 CFR 903.7(s)(1)).

B.4 Capital Improvements. This section refers to PHAs that receive funding from the Capital Fund Program (CFP) which is not applicable for HCV-Only PHAs.

B.5 Most Recent Fiscal Year Audit. If the results of the most recent fiscal year audit for the PHA included any findings, mark "yes" and describe those findings in the space provided (24 CFR 903.7(p)).

C. Other Document and/or Certification Requirements.

C.1 Resident Advisory Board (RAB) comments. If the RAB had comments on the annual plan, mark "yes," submit the comments as an attachment to the Plan and describe the analysis of the comments and the PHA's decision made on these recommendations (24 CFR 903.13(c), 24 CFR 903.19).

C.2 Certification by State of Local Officials. Form HUD-50077-SL, *Certification by State or Local Officials of PHA Plans Consistency with the Consolidated Plan*, must be submitted by the PHA as an electronic attachment to the PHA Plan (24 CFR 903.15). Note: A PHA may request to change its fiscal year to better coordinate its planning with planning done under the Consolidated Plan process by State or local officials as applicable.

C.3 **Civil Rights Certification/ Certification Listing Policies and Programs that the PHA has Revised since Submission of its Last Annual Plan.** Provide a certification that the following plan elements have been revised, provided to the RAB for comment before implementation, approved by the PHA board, and made available for review and inspection by the public. This requirement is satisfied by completing and submitting form HUD-50077 ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed*. Form HUD-50077-ST-HCV-HP, *PHA Certifications of Compliance with PHA Plan, Civil Rights, and Related Laws and Regulations Including PHA Plan Elements that Have Changed* must be submitted by the PHA as an electronic attachment to the PHA Plan. This includes all certifications relating to Civil Rights and related regulations. A PHA will be considered in compliance with the certification requirement to affirmatively further fair housing if the PHA fulfills the requirements of 24 CFR 5.150 *et seq*., 24 CFR 903.7(o)(1), and 24 CFR 903.15.

C.4 Challenged Elements. If any element of the Annual PHA Plan or 5-Year PHA Plan is challenged, a PHA must include such information as an attachment to the Annual PHA Plan or 5-Year PHA Plan with a description of any challenges to Plan elements, the source of the challenge, and the PHA's response to the public (24 CFR 903.23(b)).

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced the Annual PHA Plan. The Annual PHA Plan provides a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public for serving the needs of low- income, very low- income, and extremely low- income families.

Public reporting burden for this information collection is estimated to average 4.52 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, to the Reports Management Officer, REE, Department of Housing and Urban Development, 451 7th Street, SW, Room 4176, Washington, DC 20410-5000. When providing comments, please refer to OMB Approval No. 2577-0226. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality.

HOUSING AUTHORITY OF THE COUNTY OF HUMBOLDT

RESIDENT ADVISORY BOARD MEETING SUMMARY

June 5, 2026, 10:00am – 11:00am

Staff

Cheryl Churchill, Executive Director

Cristina Fonseca, Housing Specialist

Jessica Olson, Admin & HR Specialist

Attendees

John Hinds

Patrick Rutherford

Meeting Notes

Ms. Churchill opened the meeting by sharing the purpose of our annual meeting.

The group reviewed HACH goals and shared progress on goals that were included in the plan for 2026. Discussion and comments were exchanged during the review of the goals.

Discussion/Comments/Concerns/Complaints

- Attendees mentioned that their main interaction with the HA is during the annual recertification process. It can feel redundant and difficult to get some of the paperwork together in the timeline provided. This is especially true for residents that are physically disabled if they have to go to the bank to print statements, or go somewhere that they can print requested documents.
    - In the course of the conversation, Cheryl and Cristina mentioned the HA has computers available to all participants to print items for packets if needed. Attendees did not know that, and others in our programs may not know that either. Attendees also commented that an online option may be helpful for many that are a little more tech savvy and also disabled, so they would not need to travel anywhere to complete the forms.
- Attendee asked about the EHV (Emergency Housing Voucher) program status. They were concerned about losing the home they've known for a long time and have been using the EHV. They are disabled and stated they would not do well if they became homeless.
    - Ms. Churchill shared that EHVs are currently projected to be funded through the 1st Quarter of next year (March 2027). Unless there is a change in HUDs funding for

EHVs, we may not be able to push it farther than March 2027. Currently, our Specialists are working on plans to move who they can from the EHV program to other voucher programs as vouchers and funding becomes available. Ms. Churchill also recommended that anyone currently on the EHV program apply for as many other Affordable Housing programs as possible so that if/when their voucher expires, they will hopefully have gotten housing assistance through other programs.

- Attendees asked if there is a current list of other Housing Assistance programs for people to have access to.
  - PHA staff responded stated that there is not currently a list, but it may be a good idea to create one.
- Attendees asked if there has been consideration regarding working with the County and City on tax incentives for private businesses to donate to help fund shortfalls in voucher programs.
  - Ms. Churchill stated that there is not currently any way for private businesses to donate with tax incentives, but it may be something that can be considered in the future.
- Participants were asked about their experience with the Inspections process – if there is enough lead time from notice to inspection, their experience with the inspector himself, etc.
  - Attendees stated that they felt they had enough time – approximately 2 weeks from receiving the letter. They also appreciated Scott Gantt, Inspector, stating that he is quick and cordial.

Wrap-up

Ms. Churchill asked the attendees if they had anything further that they would like to discuss. Attendees thanked staff for the meeting and shared that they found it very informative.

Possible Action Items

- Research how other agencies that serve a similar population size as ours do their recertification process (e.g. online portal, email, traditional/paper)
- Look into creation and distribution of List of Affordable Housing Programs in City of Eureka and County of Humboldt.
- Research tax deductible donation to voucher programs for local businesses to donate.
- Tenant Survey – Update and issue for 2026; add a question on best method of information distribution (e.g. PHA website, email, USPS mail, etc.)

HOUSING AUTHORITY OF THE COUNTY OF HUMBODLT

RESOLUTION 528

RESOLUTION TO APPROVE ANNUAL AGENCY PLAN

WHEREAS, In order to be in compliance with regulations of the United States Department of Housing and Urban Development, the Housing Authority of the County of Humboldt must submit an agency plan on an annual basis; and

WHEREAS, The Agency Plans have been reviewed for accuracy and completeness; and

WHEREAS, A Public Notice stating the Draft Agency Plan were available for review at the Housing Authority office from July 30, 2026 through September 13, 2026 was published and available on the Housing Authority of the County of Humboldt website and front lobby of the Housing Authority office; and

WHEREAS, The Public Hearing was held on September 1, 2026; and

WHEREAS, There were no changes or corrections to the agency plans suggested.

NOW, THEREFORE, BE IT RESOLVED, That the Commissioners of the Housing Authority of the County of Humboldt do hereby approve the Annual Agency Plan for 2027.

PASSED AND ADOPTED on the _________ day of ____________ 2026 by the following vote:

AYES:
NAYS:
ABSENT:
ABSTAIN:

_________________________	____________________________
Name	Name
_________________________	____________________________
Title	Title
_________________________	____________________________
Signature	Signature