

**THE PHILADELPHIA HOUSING AUTHORITY  
MEETING OF THE BOARD OF COMMISSIONERS  
2013 RIDGE AVE.  
PHILADELPHIA, PA 19121  
WEDNESDAY, JUNE 18, 2025  
AGENDA**

---

- A. Call to Order** – Lynette Brown-Sow, Chair
- B. Remarks** – Kelvin A. Jeremiah, President & CEO
- C. Approval of the Minutes** of the Annual Board Meeting held May 15, 2025 as distributed
- D. New Business**

- 1. RESOLUTION APPROVING THE PHILADELPHIA HOUSING AUTHORITY'S ANNUAL MOVING TO WORK REPORT FOR FISCAL YEAR 2025 FOR SUBMISSION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

Jennifer Ragen

- 2. RESOLUTION AUTHORIZING A CONTRACT FOR HOUSING AND SUPPORTIVE SERVICES FOR 2112 RIDGE AVENUE WITH VALLEY YOUTH HOUSE COMMITTEE, INC.**

Dave Walsh

- 3. RESOLUTION AUTHORIZING A CONTRACT AMENDMENT WITH BENCHMARK REAL ESTATE PARTNERS, LLC FOR 2112-2114 RIDGE AVENUE**

Dave Walsh

- 4. RESOLUTION AUTHORIZING THE PHILADELPHIA HOUSING AUTHORITY TO AMEND RESOLUTION NO. 12372 RE: BUDGET FOR FAIRHILL PHASE I**

Greg Hampson

- 5. RESOLUTION AUTHORIZING THE PHILADELPHIA HOUSING AUTHORITY TO AMEND RESOLUTION NO. 12373 RE: BUDGET FOR FAIRHILL PHASE II**

Greg Hampson

- 6. RESOLUTION AUTHORIZING A MASTER DEVELOPMENT AGREEMENT WITH MISSION FIRST FOR THE REDEVELOPMENT OF THE HARRISON PLAZA LOW- RISE DEVELOPMENT AND ALL NECESSARY ACTIONS AND RELATED ACTIVITIES**

Greg Hampson

**7. RESOLUTION AUTHORIZING THE PHILADELPHIA HOUSING AUTHORITY  
EMPLOYEE HOME BUYING ASSISTANCE PROGRAM**

Kimberly Woods

**8. RESOLUTION APPROVING AMENDMENTS TO THE PHILADELPHIA HOUSING  
AUTHORITY 'S LOBBYING ACTIVITIES POLICY**

Laurence M. Redican

**9. RESOLUTION APPROVING AMENDMENTS TO THE PHILADELPHIA HOUSING  
AUTHORITY'S PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY  
POLICY AND THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN**

Laurence M. Redican

**E. Public Comment Period**

## **RESOLUTION NO. 1**

### **RESOLUTION APPROVING THE PHILADELPHIA HOUSING AUTHORITY'S ANNUAL MOVING TO WORK REPORT FOR FISCAL YEAR 2025 FOR SUBMISSION TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**

**WHEREAS**, the U.S. Department of Housing and Urban Development ("HUD") requires the Philadelphia Housing Authority ("PHA"), as a participant in the Moving to Work Demonstration Program ("MTW"), to submit an Annual Report on the status of its programs, operations, and finances in a form specified and required by HUD; and

**WHEREAS**, under the MTW Agreement, HUD will assess PHA's performance on an annual basis by comparing, at the end of PHA's fiscal year, its goals as stated in its approved MTW Annual Plan, to its actual performance, as stated in its Annual Report; and

**WHEREAS**, PHA must include in the MTW Annual Report all required elements as described in the MTW Agreement; and

**WHEREAS**, the Annual Report must be submitted ninety (90) days after the end of PHA's fiscal year; and

**WHEREAS**, PHA's fiscal year ended on March 31, 2025 and its Annual Report is due to HUD on or before June 30, 2025; and

**WHEREAS**, PHA has prepared its Annual MTW Report for Fiscal Year 2025, which is ready for timely submission to HUD and which contains all the required elements;

**BE IT RESOLVED**, that the PHA Board of Commissioners hereby approves PHA's Annual Report for the MTW Demonstration Program for Fiscal Year 2025 (period ending March 31, 2025), as distributed to the Board, for submission to HUD, and authorizes the President & CEO and/or his designee(s) to undertake all necessary actions including, but not limited to, responding to HUD comments and requests for additional information, in order to secure HUD acceptance for the MTW Annual Report.

## **RESOLUTION NO. 2**

### **RESOLUTION AUTHORIZING A CONTRACT FOR HOUSING AND SUPPORTIVE SERVICES FOR 2112 RIDGE AVENUE WITH VALLEY YOUTH HOUSE COMMITTEE, INC.**

**WHEREAS**, the Philadelphia Housing Authority ("PHA") has identified a need for a housing and supportive services provider, to manage and operate a new supportive housing facility, located at 2112 Ridge Avenue in the Sharswood district of Lower North Philadelphia, and a Request for Proposal was developed for the selection of companies to address fulfilling this requirement, according to established procedures and all applicable laws regarding public contracts; and

**WHEREAS**, the Request for Proposal was posted on PHA's website, advertised via local publications and chambers of commerce, mailed to qualified entities on PHA's Outreach List, and distributed to those who responded to the invitation; and

**WHEREAS**, the proposals were reviewed and evaluated by an evaluation committee and the supporting documents were reviewed by the contracting officer; and

**WHEREAS**, based upon the consensus evaluation and approval for presentation to the Board after additional review processes, including Board committee and resident leadership review, it is recommended a contract be awarded to Valley Youth House Committee, Inc.; and

**WHEREAS**, work is to be assigned to the awardee at the discretion of the contracting officer based on need, performance and other legitimate business factors, and may be altered within the terms of the contract at any time during the course of the contract at the discretion of the contracting officer; and

**WHEREAS**, it is recommended that the amount to be expended under the contract shall not exceed seven hundred ten thousand two hundred twenty-one dollars (\$710,221) with a two-year base period and three (3) one-year option periods, as follows:

- 1) The not-to-exceed amount for the two-year year base period is two hundred seventy-nine thousand three hundred forty-seven dollars (\$279,347);
- 2) The not-to-exceed amount for the first one-year option period is one hundred thirty-nine thousand six hundred thirty-five dollars (\$139,635);
- 3) The not-to-exceed amount for the second one-year option period is one hundred forty-three thousand five hundred eighty-five dollars (\$143,585); and
- 4) The not-to-exceed amount for the third one-year option period is one hundred forty-seven thousand six hundred fifty-four dollars (\$147,654);

**BE IT RESOLVED**, that the Board of Commissioners hereby authorizes the President & CEO and/or his authorized designee(s) to conclude and execute a contract with Valley Youth House Committee, Inc. for an amount not to exceed seven hundred ten thousand two hundred twenty-one dollars (\$710,221), subject to the availability of funds therefor, as set forth above, and to take all necessary actions relating to said contract, including determining whether options available under the contract, if any, shall be exercised.

### **RESOLUTION NO. 3**

#### **RESOLUTION AUTHORIZING A CONTRACT AMENDMENT WITH BENCHMARK REAL ESTATE PARTNERS, LLC FOR 2112-2114 RIDGE AVENUE**

**WHEREAS**, on November 1, 2021, PHA contracted with Benchmark Real Estate Partners, LLC, pursuant to Resolution No. 12179 (relating to awarded contract number P-005035), approved by the Board of Commissioners on October 22, 2021, for construction management services for 2112-2114 Ridge Avenue; and

**WHEREAS**, the contract awarded by PHA on November 1, 2021 was for a not-to-exceed amount of eleven million nine hundred five thousand five hundred thirty-five dollars (\$11,905,535); and

**WHEREAS**, on June 15, 2023, after detailed review of a modification request, PHA approved the modification amount of one million eight hundred ninety-four thousand four hundred sixty-five dollars (\$1,894,465), pursuant to Resolution No. 12296, for construction management services for 2112-2114 Ridge Avenue; and

**WHEREAS**, on September 25, 2024, pursuant to CPP#10, PHA approved an additional modification in the amount of ninety-two thousand six hundred ten (\$92,610), raising the total of all combined modifications to one million nine hundred eighty-seven thousand seventy-five dollars (\$1,987,075); and

**WHEREAS**, due to the demolition of an adjacent property at 2128 Ridge Ave, delay of demolition at the worksite and increased construction costs incurred due to demolition delays and related costs, PHA has a further need to modify the contract in the amount of an additional seven hundred seventeen thousand five hundred eighteen dollars (\$717,518), which will raise the total modified amount to two million seven hundred four thousand five hundred ninety-three dollars (\$2,704,593), requiring Board approval due to the modification total being over the CCP#10 limit of an additional one million dollar (\$1,000,000) modification threshold; and

**WHEREAS**, pursuant to CPP#10, a modification to a contract must go before the Board for pre-approval when the modification or sum of all modifications will be in excess of one million dollars (\$1,000,000), regardless of percentage of contract value, or when the modification will exceed twenty percent (20%) of the contract value (or two hundred fifty thousand dollars (\$250,000), whichever is greater); and

**WHEREAS**, in order to proceed with the work as required, Board authorization is sought for an increase of seven hundred seventeen thousand five hundred eighteen dollars (\$717,518.00), for a Guaranteed Maximum Price ("GMP") contract amount of fourteen million six hundred ten thousand one hundred twenty-eight dollars (\$14,610,128), from the current amount (original contract and existing modifications) of thirteen million eight hundred ninety-two thousand six hundred ten dollars (\$13,892,610);

**BE IT RESOLVED**, that the Board of Commissioners hereby authorizes the President & CEO, or his authorized designee is hereby authorized to amend PHA's contract with Benchmark Real Estate Partners, LLC, as entered into with existing modifications, to have the contract GMP amount be increased to fourteen million six hundred ten thousand one hundred twenty-eight dollars (\$14,610,128), as set forth above and subject to the availability of funds therefor.

## **RESOLUTION NO. 4**

### **RESOLUTION AUTHORIZING THE PHILADELPHIA HOUSING AUTHORITY TO AMEND RESOLUTION NO. 12372 RE: BUDGET FOR FAIRHILL PHASE I**

**WHEREAS**, the Philadelphia Housing Authority (“PHA”) adopted Resolution 12372 on September 19, 2024 regarding the approval of the preliminary budget for the redevelopment of Fairhill Phase I; and

**WHEREAS**, PHA has reviewed the final budget for the project, which reflects updated equity and market factors, as well as the revised value of land acquisition; and

**WHEREAS**, the total project cost and the PHA loan need to be adjusted to account for the changes in budget; and

**WHEREAS**, the total project cost is hereby amended to eighty-six million five hundred three thousand seventy-four dollars (\$86,503,074), an increase of five million seven hundred seventy thousand two hundred seventy-four dollars (\$5,770,274) from the previously approved amount of eighty million seven hundred thousand eight hundred dollars (\$80,732,800), reflecting the final budget for the project; and

**WHEREAS**, the PHA loan contribution is hereby amended to thirty-four million four hundred eighty-two thousand six hundred thirteen dollars (\$34,482,613), an adjustment from the earlier amount of thirty million two hundred sixty-six thousand nine hundred sixty-four dollars (\$30,266,964), consistent with the updated financial requirements of the project; and

**WHEREAS**, all other terms and condition of Resolution 12372 remain in full force and effect except as specifically amended herein;

**BE IT RESOLVED**, that the PHA Board of Commissioners hereby authorizes the revision to the total development cost and the PHA loan contribution in the amounts set forth above and all other terms, conditions and authorizations in Resolution 12372 remain in full force and effect.

## **RESOLUTION NO. 5**

### **RESOLUTION AUTHORIZING THE PHILADELPHIA HOUSING AUTHORITY TO AMEND RESOLUTION NO. 12373 RE: BUDGET FOR FAIRHILL PHASE II**

**WHEREAS**, the Philadelphia Housing Authority (“PHA”) adopted Resolution 12373 on September 19, 2024 regarding the approval of the preliminary budget for the redevelopment of Fairhill Phase II; and

**WHEREAS**, PHA has reviewed the final budget for the project, which reflects updated equity and market factors, as well as the revised value of land acquisition; and

**WHEREAS**, the total project cost and the PHA loan need to be adjusted to account for the changes in budget; and

**WHEREAS**, the total project cost is hereby amended to ninety-three million six hundred fifty thousand five hundred seventy-four dollars (\$93,650,574), an increase of five million seven hundred sixty-four thousand eight hundred thirty-eight dollars (\$5,764,838) from the previously approved amount of eighty-seven million eight hundred eighty-five thousand seven hundred thirty-six dollars (\$87,885,736). reflecting the final budget for the project; and

**WHEREAS**, the PHA loan contribution is hereby amended to forty-two million one hundred seventy-one thousand seven hundred fifty-five dollars (\$42,171,755), an adjustment from the earlier amount of thirty-seven million seven hundred thirty-four nine hundred seventy-three dollars (\$37,734,973), consistent with the updated financial requirements of the project; and

**WHEREAS**, all other terms and condition of Resolution 12373 remain in full force and effect except as specifically amended herein;

**BE IT RESOLVED**, that the PHA Board of Commissioners hereby authorizes the revision to the total development cost and the PHA loan contribution in the amounts set forth above and all other terms, conditions and authorizations in Resolution 12373 remain in full force and effect.

## **RESOLUTION NO. 6**

### **RESOLUTION AUTHORIZING A MASTER DEVELOPMENT AGREEMENT WITH MISSION FIRST FOR THE REDEVELOPMENT OF THE HARRISON PLAZA LOW-RISE DEVELOPMENT AND ALL NECESSARY ACTIONS AND RELATED ACTIVITIES**

**WHEREAS**, in 2023, the Philadelphia Housing Authority (“PHA”) obtained a five hundred thousand (\$500,000) dollar Choice Neighborhood Planning grant to develop a housing plan for the Harrison Plaza Low-Rise public housing development (“Development”); and

**WHEREAS**, in January 2024, PHA issued a Request for Qualifications to select a development partner and take the lead on the development of the housing master plan and phasing and serve as the developer for the entire phased Harrison Plaza Low-Rise redevelopment, which will include a Rental Administration Demonstration (“RAD”) Conversion of all public housing units as well as a series of four and nine percent applications for low-income housing tax credit financing and other grant funding applications; and

**WHEREAS**, there were three (3) respondents to the Request for Qualifications and the PHA evaluation committee selected Mission First as the developer; and

**WHEREAS**, each specific redevelopment phase or multiple phases will be brought back before the Board once the financing structures are complete; and

**WHEREAS**, PHA wishes to contract with Mission First for it to be the lead entity responsible for the Development, with the terms and responsibilities to be outlined in the development agreement;

**BE IT RESOLVED**, that the PHA Board of Commissioners hereby authorizes the President & CEO and/or his authorized designee(s), to enter into a Master Development Agreement with Mission First, or an affiliate entity; make the commitments as outlined in the Request for Proposal and Mission First’s proposal; sign grant applications for additional funding to support the redevelopment activities; submit all initial RAD Conversion applications; and undertake all other activities reasonably related to effectuating this resolution.



## **RESOLUTION NO. 7**

### **RESOLUTION AUTHORIZING THE PHILADELPHIA HOUSING AUTHORITY EMPLOYEE HOME BUYING ASSISTANCE PROGRAM**

**WHEREAS**, PHA believes in fostering a culture of support, growth, and empowerment, understands that owning a home is a significant milestone for many individuals and families, and is committed to assisting PHA's valued employees to achieve their dream of homeownership; and

**WHEREAS**, PHA believes in the value of employee empowerment to become homeowners, enhancing their financial stability and commitment to the community; and

**WHEREAS**, PHA wishes to establish a PHA Home Buying Assistance Program ("Program") to provide financial assistance to support PHA employee homeownership and to foster community investment in properties developed, or sold by PHA or its partners; and

**WHEREAS**, this resolution is to authorize the Program, in substantially the form attached to this resolution, with the express acknowledgement that it may be amended or terminated at any time and is subject to the availability of funding, as determined by the President & CEO based on the PHA budget in effect; and

**WHEREAS**, the Program would support eligible PHA employees, seeking to purchase qualifying homes, by providing individual grants of twenty thousand dollars (\$20,000) to defray costs associated with purchasing a primary residence, such as for down payment assistance, mortgage, and/or closing cost assistance;

**BE IT RESOLVED**, that the Board of Commissioners hereby authorizes the President & CEO and/or his authorized designee(s) to implement the PHA Home Buying Assistance Program, as substantially described in the attachment to this resolution, with the express acknowledgment that it may be amended or terminated at any time and is dependent on the availability of funding therefor.

**PHA EMPLOYEE HOME BUYING ASSISTANCE PROGRAM**

**Program Overview**

The Philadelphia Housing Authority (PHA) believes in fostering a culture of support, growth, and empowerment. We understand that owning a home is a significant milestone for many individuals and families, and we are committed to assisting our valued employees to achieve their dream of homeownership.

**Purpose**

The goal of the PHA Employee Home Buying Assistance Program is to empower employees to become homeowners, enhancing their financial stability and commitment to the community. The program provides financial assistance to support homeownership, financial stability and to foster community investment in properties developed, or sold by PHA or the agency's partners.

**Waiting Period**

An employee must complete twelve (12) months of continuous employment before applying for the PHA Employee Home Buying Assistance Program.

**Eligibility to Participate**

Full time, regular status employees are eligible to participate in the program.

**Financial Assistance Under the Program**

Individual grants of twenty thousand dollars (\$20,000) are available under the Program to provide assistance to the buyer of the property with: 1) the down payment, 2) the mortgage, and/or 3) closing costs, to reduce out of pocket costs for the employee.

**Program Requirements**

There are several requirements to participate in the PHA Employee Home Buying Assistance Program.

*Financial Credit Limitations*

Employees must meet financial credit and income requirements imposed by any financial institution from which a mortgage will be sought under the program.

*Property Eligibility*

The property must be one of PHA's constructed or sold properties, or a property developed in partnership with PHA.

*Income Limitations*

The employee's household income may be subject to U.S. Department of Housing and Urban Development (HUD) income limitations.

*Occupancy Period*

The home purchased under the PHA Employee Home Buying Assistance Program must be, and must remain for the duration of the four (4) year period following receipt of the grant, the employee's primary residence.

**PHA Employee Home Buying Assistance Program Limitations**

Participation in the program is voluntary and subject to availability of PHA funds.

The PHA Employee Home Ownership Program can be amended or cancelled at any time.

*Employees should consult with a tax professional to obtain information and guidance on the impact of receipt of funds through this program, and the potential for resulting tax liability.*

## **RESOLUTION NO. 8**

### **RESOLUTION APPROVING AMENDMENTS TO THE PHILADELPHIA HOUSING AUTHORITY'S LOBBYING POLICY**

**WHEREAS**, the Philadelphia Housing Authority ("PHA") on June 1, 2015, adopted a Lobbying Policy by Board Resolution No. 11778; and

**WHEREAS**, PHA has recently conducted a review of the Lobbying Policy to ensure compliance with federal, state and local requirements; and

**WHEREA**, PHA has determined that the proposed amendments to the Lobbying Policy, as attached hereto, which are to update and clarify certain provisions, are in the best interests of PHA;

**BE IT RESOLVED**, that the PHA Board of Commissioners hereby approves the changes to the Lobbying Policy, as attached to this Resolution.



## LOBBYING ACTIVITIES POLICY

*Effective July 1, 2025, per Board Resolution No. 12418, approved on June 18, 2025  
amending the June 1, 2015 policy, previously adopted by Board Resolution No. 11778*

### Objective:

To provide Commissioners and employees of the Philadelphia Housing Authority (“PHA”) and employees of entities controlled by PHA with guidance on the proper coordination and reporting of lobbying activities.

### Section 1 – Purpose:

The purpose of this policy is to facilitate compliance with applicable law relating to lobbying activities by PHA employees and Commissioners, controlled entities and employees of any controlled entities, vendors hired to specifically engage in lobbying, if any and contractors and grantees and subcontractors and subgrantees of PHA. PHA, as an entity may engage in lobbying activities and must comply with applicable law.

### Section 2 – Definitions:

**Byrd Amendment:** The federal law (31 U.S. C. §1352(b) reflected in 24 CFR Part 87) which prohibits federal grantees, contractors and those with cooperative agreements with the federal government from using federal funds to lobby the federal executive or legislative branches of government (including any agency employee) with respect to the awarding of specific contracts, grants, loans, guaranties or cooperative agreements or any extension, continuation, renewal, amendment or modification thereof.

**Government Official:** Any elected or appointed official or any employee of any state, local or federal government exercising discretionary authority with respect to executive agency or legislative actions.

**HUD:** U.S. Department of Housing and Urban Development.

**Lobbying Activities:** Lobbying contacts and efforts in support of such contacts, including preparation and planning activities, research and other background work that is intended, at the time it is performed, for use in lobbying contacts, and coordination with the lobbying activities of others.

**Lobbying Contact:** Any oral or written communication to a government official made on behalf of PHA with regard to any of the following:

the formulation, modification, or adoption of legislation including legislative proposals; or

the formulation, modification, or adoption of a rule, regulation, executive order, or any other program, policy, or position of any public, governmental body; or

the administration or execution of a program or policy, including negotiation, award, or administration of a contract, grant, loan, permit or license; or

the nomination or confirmation of a person for a position subject to confirmation by any legislative body; or

a contact made on behalf of PHA includes a contact for which an employee or Commissioner has been reimbursed or is eligible for reimbursement for expenses under PHA's travel policy in effect at the time of the contact;

the term "lobbying contact" only includes a communication that is defined under applicable law as such; the following communications are expressly not lobbying contacts:

A speech, article, publication or other material that is distributed and made available to the public, or through radio, television, cable television, the internet, or other medium of mass communication; or

A request for a meeting, a request for the status of an action, or any other similar administrative request, if the request does not include an attempt to influence a government official; or

Testimony given before a committee, subcommittee, or task force of any legislative body or submitted for inclusion in the public record of a hearing conducted by such committee, subcommittee, or task force but not if such testimony or submission is drafted such that it constitutes a violation of the Byrd Amendment; or

Information provided in writing in response to an oral or written request by a government official for specific information but not if such information is drafted such that it constitutes a violation of the Byrd Amendment; or

A communication required by subpoena, civil investigative demand, or otherwise compelled by statute, regulation, or other action of any legislative body or any government agency, including but not limited to any communication compelled by a contract, grant, loan, permit, or license with any governmental body; or

A communication made in response to a notice in the Federal Register, Commerce Business Daily or other similar publication soliciting communications from the public and directed to a government agency or agency official specifically designated in the notice to receive such communications; or

A communication that is not possible to report without disclosing information, the unauthorized disclosure of which is prohibited by law; or

A communication made to an official in an agency in regard to: (1) a judicial proceeding or a criminal or civil law enforcement inquiry, investigation, or proceeding or (2) a filing or proceeding that a government entity is specifically required by statute or regulation to maintain or conduct on a confidential basis, if that agency is charged with responsibility for such proceeding, inquiry, investigation, or filing; or

A written comment filed in the course of a public proceeding or any other communication that is made

on the record in a public proceeding; or

disclosure by an individual that is protected under the amendments made by the Whistleblower Protection Act of 1989, under the Inspector General Action of 1978 or under another provision of law.

**Lobbyist:** Any individual who is employed or retained for financial or other compensation primarily for lobbying activities.

**PHA:** Philadelphia Housing Authority.

**Preparation and Planning Activities:** The creation of work product solely for the purpose of influencing a federal congressional or executive decision with respect to the award of a specific federal contract, grant, loan, cooperative agreement, guaranty or any extension, continuation, renewal or a modification thereof, but does not include technical advice or analysis by a professional acting in his or her professional capacity.

### Section 3 – Responsibilities:

The President and CEO of PHA is responsible for authorizing in writing PHA employees and Commissioners to lobby on behalf of PHA, for coordinating and supervising all lobbying activities on behalf of PHA and for eliciting from persons authorized to lobby on behalf of PHA information necessary to enable PHA to make required certifications, disclosures and related filings, including the submission of certifications as required by the Byrd Amendment, and any disclosures or certifications required by the Commonwealth or City.

The PHA President and CEO, any PHA Commissioner, and PHA employees who are authorized by PHA's President and CEO to lobby on behalf of PHA may lobby federal, state and/or local officials.

Such persons acting in their official capacities with PHA are considered to be state and local officials for purposes of state and local laws regulating lobbying activities and are considered to be public officials for purposes of federal laws regulating lobbying activities.

Such PHA employees and Commissioners are exempt from local, state, and federal lobbyist registration and reporting obligations, other than disclosure requirements due from PHA under the Byrd Amendment.

Only PHA's President and CEO may authorize a contract with a lobbyist or lobbyist firm to conduct lobbying activities on behalf of PHA and only if any such lobbyist or lobbyist firm is duly procured by PHA.

Any lobbyist or lobbyist firm shall be required, under the contract with PHA relating to such engagement, to comply with all applicable registration and disclosure requirements relating to such lobbying activities and to demonstrate such compliance to PHA throughout the term of any such contract for lobbying activities.

The PHA Department of Supply Chain Management is responsible for:

Including, in all contracts for lobbying activities, service provisions consistent with this policy to comply with applicable lobbying registration and reporting laws, and in all contracts, subcontracts, grants and sub-grants by or indirectly by PHA, requirements to comply with the Byrd Amendment;

Monitoring the compliance by contracted vendors with all applicable lobbyist registration and reporting laws and with the prohibitions and requirements of the Byrd Amendment.

The PHA Department of Resident Programs and Partnerships (RPP) is responsible for monitoring the use of federal funds by members of a Resident Council or a recognized jurisdiction- wide organization of residents to ensure that any federal funds provided to these organizations by PHA or otherwise are not used to lobby federal officials with respect to specific contracts, grants, loans, and modifications or extensions thereof.

The PHA General Counsel is responsible for advising PHA on the lobbying reporting requirements as questions arise and monitoring the compliance by contracted vendors with all applicable lobbyist registration and reporting laws and with the prohibitions and requirements of the Byrd Amendment.

#### Section 4 – Scope of Application:

This policy addresses only the official representation of PHA by persons and firms authorized by the President and CEO.

Nothing in this policy is intended to restrict protected personal expression by a PHA Commissioner or a PHA employee or any employee of any entity controlled by PHA on personal time using personal resources; nor is this policy intended to restrict a PHA Commissioner or a PHA employee or any employee of any entity controlled by PHA from identifying his/her profession or place of employment, or PHA Board membership in the context of his/her personal communication with any government official.

Any such person must make it clear that he/she is expressing his/her personal views and not an official position of PHA unless authorized to act on behalf of PHA by the President and CEO as stated in this policy.

#### Section 5 - Prohibited Activities:

Neither PHA, nor any PHA Commissioner, nor any PHA employee, nor any entity controlled by PHA, nor any employee of any entity controlled by PHA, nor any contractor, subcontractor, grantee or subgrantee of PHA may use any federal funds to lobby the federal executive or legislative branches of government, including any agency employee, with respect to the awarding of specific contracts, grants, loans, cooperative agreements, guaranties or any extension, continuation, renewal, amendment or modification thereof.

This prohibition on the use of federal funds does not apply to activities intended to influence executive and legislative discretion not in connection with a specific award, such as routine and on-going post-award administration of federal contracts and grants, general advocacy and contacts regarding specific federal contracts, grants, loans, guaranties and co-operative agreements prior to the issuance of any formal solicitation regarding any federal contract, grant, loan, guaranty or co-operative agreement or any extension or modification thereof.

No PHA Commissioner, no PHA employee, no entity controlled by PHA, nor any employee of any entity controlled by PHA shall engage in lobbying activities, or give the appearance of engaging in lobbying activities on behalf of PHA, without specific prior written authorization by the PHA President and CEO.

The President and CEO of PHA may not authorize any person other than a PHA employee (which does not include any employee whose salary is paid by funds of any entity controlled by PHA), or a lobbyist or lobbyist firm duly procured by PHA, to engage in lobbying activities on behalf of PHA.

No PHA Commissioner, no PHA employee, no entity controlled by PHA, nor any employee of any entity controlled by PHA may employ or retain a lobbyist or lobbyist firm without the prior written approval of the PHA President and CEO and only in compliance with all applicable PHA procurement policies.

#### Section 6 - Reporting of Lobbying Activities

Whenever PHA applies for, and whenever PHA is awarded, a federal contract, grant, loan, guaranty or cooperative agreement or any extension, continuation, renewal, amendment or modification thereof (as referenced in the Byrd Amendment), the PHA President and CEO shall make the certification required by the Byrd Amendment and shall disclose using Standard Form LLL, the use of any funds or agreement to use funds to make any payment to influence or attempt to influence an officer or employee of an agency, a member of the United States Congress, an officer or employee of the United States Congress or an employee of a member of the United States Congress with respect to any federal contract, grant, loan, guaranty or cooperative agreement or any extension, continuation, renewal, amendment or modification thereof (as referenced in the Byrd Amendment).

In the event PHA engages a lobbyist or lobbyist firm in accordance with this policy, PHA shall require in the contract with such lobbyist or lobbyist firm that such lobbyist or firm shall comply with all applicable lobbyist registration and reporting requirements and shall require any such lobbyist or lobbyist firm to demonstrate compliance with all such requirements.

Upon retaining any lobbyist or lobbyist firm to engage in lobbying activities on behalf of PHA, the PHA President and CEO shall obtain from the PHA General Counsel a list of any and all registration and reporting requirements to be fulfilled by PHA as a result of retaining any lobbyist or lobbyist firm and shall create all necessary procedures and internal reporting obligations to assure PHA's compliance with any such registration and reporting requirements. The President and CEO, or his designee, shall make all such registrations and reports in accordance with the Federal, Commonwealth or local requirements.

Duly authorized PHA Commissioners and PHA employees who engage in lobbying activities during any calendar quarter (i.e. January 1 – March 31, April 1 – June 30, July 1 – September 30, October 1 – December 31) must report those activities in a standard form provided by the General Counsel to the PHA President and CEO, with a copy to the PHA General Counsel, within seven (7) days of the lobbying contact and shall upon request, supply all information regarding such lobbying contacts, including all costs and reimbursements related thereto.

Such quarterly reports shall also disclose any honorary contributions made during the quarter to which the report relates.

#### Section 7 - Honorary Contributions, Gifts, and Travel:

Honorary contributions include funds contributed or disbursed during the quarter by the PHA or by any person conducting lobbying activities on behalf of PHA:

to pay the cost of an event to honor or recognize a government official, including but not limited to, an event at which a government official is an honored guest or receives a special award, honor plaque, or honorary degree;



to an entity that is named for a government official, or to a person or entity in recognition of such official;

to an entity established, financed, maintained or controlled by a government official or an entity designated by such official; or

to pay the cost of a meeting, retreat, conference, or other similar event held by or in the name of one (1) or more government officials.

PHA is not required to report the purchase of tickets or a table to attend an event sponsored by another organization, even if a government official is recognized or honored at the event.

No PHA Commissioner, nor any PHA employee, nor any entity controlled by PHA, nor any employee of any entity controlled by PHA may make any honorary contribution as defined in Section 7, paragraph 1 above, nor pay for any gift to or travel for any government official unless the PHA Commissioner, employee or entity has received the prior written approval of the PHA President and CEO of such a contribution, gift or payment for travel. A copy of any such approval shall be sent to the PHA General Counsel who shall advise the PHA President and CEO and the individual making the honorary contribution, gift or payment for travel of all applicable reporting requirements.

The restrictions in this policy regarding honorary contributions, gifts, and travel costs shall not be applied to expenditures by PHA, any of its Commissioners, employees or any entity controlled by PHA or any employees of any such controlled entity with respect to government officials who are PHA Commissioners, PHA employees and entities controlled by PHA and employees thereof.

The provisions of this Section 7 regarding honorary contributions shall not be construed to change in any way the restrictions upon lobbying activities set forth in this Policy; nor shall Section 7 be construed to permit contributions by PHA to any partisan political fundraising event or for any other prohibited purpose.

#### Section 8 - Periodic Training:

As part of PHA's periodic training of PHA Commissioners and of PHA employees by PHA's Human Resources Department, all PHA Commissioners and PHA employees and employees of all entities controlled by PHA will be advised that they may not engage in lobbying activities on behalf of PHA unless authorized, in writing, by the PHA President and CEO to do so and are trained by the General Counsel as soon as practical following any such authorization.

No less frequently than once every two years, the PHA General Counsel, or any attorney designated by the PHA General Counsel to do so, will train the PHA President and CEO, the PHA's Commissioners and any PHA employees then authorized by the PHA President and CEO to lobby on behalf of PHA. Such training shall consist of a review of this policy and any legal and any regulatory developments relating to this policy since the prior such training.

At the execution of RAB and Resident Council MOUs, RPP will send a notice to resident leaders reminding them that they may not conduct lobbying activities on behalf of PHA and may not use any federal funds provided to them by PHA or otherwise to lobby federal officials with respect to specific contracts, grants, loans and modifications or extensions thereof. At a meeting with resident leaders following the issuance of each such notice, The General Counsel or his designee will review the requirements of this Lobbying Policy.

#### Section 9- Violations of this Policy:

This policy reflects the requirements of applicable law regarding lobbying activities on behalf of PHA.

Violations of this policy may result in civil and criminal penalties as described in the governing law. Whether or not civil or criminal penalties are imposed or apply, violations of this policy may result in termination of employment or other appropriate actions as determined by the PHA Office of Human Resources.

#### Section 10 - Questions:

If a PHA Commissioner or a PHA employee is in doubt whether a government official is covered by this policy, the PHA Commissioner or PHA employee should consult with the PHA President and CEO or the PHA General Counsel.

Questions about this policy, including questions about whether particular activities are subject to this policy, should be directed to the PHA President and CEO or the PHA General Counsel

## **RESOLUTION NO. 9**

### **RESOLUTION APPROVING AMENDMENTS TO THE PHILADELPHIA HOUSING AUTHORITY'S PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY AND THE HOUSING CHOICE VOUCHER ADMINISTRATIVE PLAN**

**WHEREAS**, the Philadelphia Housing Authority ("PHA") has adopted the Admissions and Continued Occupancy Policy ("ACOP") applicable to the Public Housing program, most recently amended with an effective date of January 1, 2025, that provides for PHA to update the ACOP to reflect changes in law or regulations, Moving to Work ("MTW") initiatives, PHA operations, or when needed to ensure staff consistency in operation; and

**WHEREAS**, PHA has an Administrative Plan applicable to the Housing Choice Voucher Program ("Admin Plan"), most recently amended with an effective date of January 1, 2025, that provides for PHA to update the Admin Plan to reflect changes in law or regulations, MTW initiatives, PHA operations, or when needed to ensure staff consistency in operation; and

**WHEREAS**, PHA has determined that the proposed amendments to the ACOP and the Admin Plan, as substantially reflected on the Summary Sheet attached to this Resolution and as distributed to the Board of Commissioners, are necessary and appropriate to promote efficient program administration, conform to legislative and regulatory requirements, MTW initiatives, or the necessity for staff consistency in operation; and

**WHEREAS**, PHA provided opportunities for public comment on the proposed amendments, including publishing a notice, posting the changes on PHA's website and soliciting public comments from May 8, 2025 through June 7, 2025 as well as holding a public hearing on the proposed amendments on May 21, 2025, and making a presentation to resident leadership on May 21, 2025;

**BE IT RESOLVED**, that the PHA Board of Commissioners hereby approves the changes to the ACOP and Admin Plan, as substantially reflected on the Summary Sheet attached to this Resolution, to be effective as of 12:01 a.m. on July 1, 2025.

## SUMMARY OF CHANGES TO THE PUBLIC HOUSING ADMISSIONS AND CONTINUED OCCUPANCY POLICY

May 2025

No.	Chapter Name Subject Area	Source	Summary of Change	Proposed Language	Effective Date
<b>Chapter 1: Overview of the Program &amp; Plan</b>					
1.	1.4 Updating and Revising the ACOP	PHA	<ul style="list-style-type: none"> <li>Expanded policy on revisions to the ACOP</li> </ul>	<p>Updated policies on revising the ACOP to include the following:</p> <ul style="list-style-type: none"> <li>PHA, from time to time, may make non-substantive changes and edits to the ACOP to clarify policy language, address inconsistencies and simplify language. PHA may update the ACOP in order to comply with mandatory (non-discretionary) changes in the regulations and/or HUD requirements without Board approval.</li> </ul>	
<b>Chapter 4: Eligibility</b>					
2.	4.2.1 Family and Household	HOTMA Income and Assets Final Rule; 24 CFR 5.403	<ul style="list-style-type: none"> <li>Revised definition of family for consistency with regulatory changes</li> </ul>	<p>A family includes, but is not limited to, the following:</p> <ul style="list-style-type: none"> <li>A single person, who may be: <ul style="list-style-type: none"> <li>An elderly person, displaced person, disabled person, near-elderly person, or any other single person;</li> <li>An otherwise eligible youth who has attained at least 18 years of age and not more than 24 years of age and who has left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act (42 U.S.C. 675(5)(H)), and is homeless or is at risk of becoming homeless at age 16 or older; or</li> </ul> </li> <li>A group of persons residing together, and such group includes, but is not limited to:</li> </ul>	

No.	Chapter Name Subject Area	Source	Summary of Change	Proposed Language	Effective Date
				<ul style="list-style-type: none"> <li>• A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);</li> <li>• An elderly family;</li> <li>• A near-elderly family;</li> <li>• A disabled family;</li> <li>• A displaced family; and</li> <li>• The remaining member of a tenant family.</li> </ul>	
3.	4.2.5 Dependent	HOTMA Income and Assets Final Rule; 24 CFR 5.603	<ul style="list-style-type: none"> <li>• Revised definition of dependent for consistency with regulatory changes</li> </ul>	A dependent is a member of the family (which excludes foster children and foster adults) other than the family head or spouse who is under 18 years of age, or is a person with a disability, or is a full-time student. Family members under the age of 18 years who are not the head or spouse are considered minors.	
4.	4.2.10 Foster Children and Foster Adults	HOTMA Income and Assets Final Rule; 24 CFR 5.603	<ul style="list-style-type: none"> <li>• Revised definition of foster child and foster adult for consistency with regulatory changes</li> </ul>	<p>A foster child is a member of the household who meets the definition of a foster child under State law. In general, a foster child is placed with the family by an authorized placement agency (e.g., public child welfare agency) or by judgment, decree, or other order of any court of competent jurisdiction.</p> <p>Foster adult is a member of the household who is 18 years of age or older and meets the definition of a foster adult under State law. In general, a foster adult is a person who is 18 years of age or older, is unable to live independently due to a debilitating physical or mental condition and is placed with the family by an authorized placement agency or by judgment, decree, or other order of any court of competent jurisdiction.</p>	
5.	4.7.4 Ineligible Non-citizens	HUD/DHS MOU (March 25, 2025)	<ul style="list-style-type: none"> <li>• Clarified policy on ineligible non-citizens</li> </ul>	<p>Removed the following provisions related to policy on ineligible non-citizens:</p> <ul style="list-style-type: none"> <li>• Ineligible non-citizens are those non-citizens who do not wish to contend their immigration status. PHA requires that non-citizens sign a certification attesting to their ineligible immigration status. PHA will not verify a family member's</li> </ul>	

No.	Chapter Name Subject Area	Source	Summary of Change	Proposed Language	Effective Date
				ineligible status and is not required to report an individual's unlawful presence in the U.S. to the United States Citizenship and Immigration Services (USCIS).	
<b>Chapter 8: Income and Adjusted Income</b>					
6.	8.2 Annual Income Includes	HOTMA Income and Assets Final Rule; 24 CFR 5.609(a)	<ul style="list-style-type: none"> <li>Revised provisions related to annual income for consistency with regulatory changes</li> </ul>	<p>Updated the following select provisions on included annual income:</p> <ul style="list-style-type: none"> <li>Annual income includes all amounts: <ul style="list-style-type: none"> <li>Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; Received from all sources by each member of the family who is 18 years of age or older, the head of household, or spouse of the head of household, in addition to unearned income received by or on behalf of each dependent who is under 18 years of age. (Unearned income is defined as any annual income that is not earned income.)</li> <li>Are anticipated to be received from a source outside the family during the 12-month period following admission or annual recertification effective date. What this means is that if two family members are not married and one provides the other with child support, the child support income is not counted since the source of the income is from an individual who is inside the "family"; and</li> <li>Not specifically excluded under 5.609(b) and the MTW Plan where applicable;</li> <li>All actual anticipated income from assets and the imputed returns on net family assets when the net family assets exceed \$50,000. Annual income also means amounts derived</li> </ul> </li> </ul>	

No.	Chapter Name Subject Area	Source	Summary of Change	Proposed Language	Effective Date
				<p>(during the 12-month period) from assets to which any member of the family has access, except where otherwise excluded under MTW.</p> <ul style="list-style-type: none"> <li>Annual income includes but is not limited to: <ul style="list-style-type: none"> <li>The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services; Include employment income of an emancipated minor if the emancipated minor is the head of household, co-head or spouse Earned income, which is defined as income or earnings from wages, tips, salaries, other employee compensation, and net income from self-employment.</li> <li>Payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation, and severance pay (See Income Exclusions concerning treatment of lump-sum additions as family assets);</li> <li>Periodic and determinable allowances, such as alimony and child support payments, and regular cash and non-cash contributions or gifts received from agencies or persons not residing in the dwelling made to or on behalf of family members;</li> </ul> </li> </ul>	
7.	8.3 Annual	HOTMA	• Revised	Updated the following select provisions	

No.	Chapter Name Subject Area	Source	Summary of Change	Proposed Language	Effective Date
	Income Exclusions	Income and Assets Final Rule; 24 CFR 5.609(b)	definitions and discussion of income exclusions for consistency with the regulations; removed redundant provisions	<p>on income exclusions:</p> <ul style="list-style-type: none"> <li>• Annual Income does not include the following:</li> <li>• Earned income of children under 18 years of age, including emancipated minors who are not the head of household, co-head or spouse <del>Income from the employment of children (including foster children) under the age of 18 years;</del></li> <li>• Payments received for the care of foster children or foster adults, or State or Tribal kinship or guardianship care payments;</li> <li>• Insurance payments and settlements for personal or property losses, including but not limited to payments through health insurance, motor vehicle insurance, and workers' compensation.</li> <li>• Income of a live-in aide, provided the person meets the definition of a live-in aide, foster child or foster adult;</li> <li>• Certain amounts received that are related to participation in the following programs: <ul style="list-style-type: none"> <li>○ Incremental earnings and benefits resulting to any family member from participation in training programs funded by HUD or in qualifying Federal, State, Tribal, or local employment training programs (including training programs not affiliated with a local government)</li> </ul> </li> </ul>	



No.	Chapter Name Subject Area	Source	Summary of Change	Proposed Language	Effective Date
				<p>and training of a family member as resident management staff. Amounts excluded must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the employment training program unless those amounts are otherwise excluded.</p> <ul style="list-style-type: none"> <li>• Income earned on amounts placed in a family's Family Self Sufficiency (FSS) account;</li> <li>• Temporary, non-recurring or sporadic income (including gifts). Non-recurring income which is defined as income that will not be repeated beyond the coming year based on information provided by the family. Non-recurring income is income that has a discrete end date and will not be repeated beyond the coming year. Examples include income received as part of a pilot guaranteed income program, payments made to the family or to a third party on behalf of the family to assist with utilities, eviction prevention, security deposits to secure housing, payments for participation in research studies depending on the duration, and general one-time payments received by or on behalf of the family,</li> </ul>	

No.	Chapter Name Subject Area	Source	Summary of Change	Proposed Language	Effective Date
				<p>Additionally, the following are considered nonrecurring income must be excluded;</p> <ul style="list-style-type: none"> <li>○ Payments from the U.S. Census Bureau for employment lasting no longer than 180 days and not culminating in permanent employment;</li> <li>○ Direct federal or state economic stimulus payments;</li> <li>○ Amounts directly received by the family as a result of state refundable tax credits or state tax refunds at the time they are received;</li> <li>○ Amounts directly received by the family as a result of federal refundable tax credits or federal tax refunds at the time they are received;</li> <li>○ Gifts for holidays, birthdays, or other significant life events or milestones (e.g., wedding, baby shower, or anniversary gifts);</li> <li>○ In-kind donations (e.g., food, clothing, or toiletries received from a food bank or similar organization); and</li> <li>○ Lump-sum additions to net family assets (e.g., lottery winnings, contest winnings, etc.);</li> </ul> <ul style="list-style-type: none"> <li>● Adoption assistance payments in excess of \$480 per adopted child the deduction amount for a dependent;</li> <li>● Deferred periodic payments of supplemental security income and social security</li> </ul>	

No.	Chapter Name Subject Area	Source	Summary of Change	Proposed Language	Effective Date
				<p>benefits that are received in a lump sum payment or in prospective monthly amounts, or any deferred Department of Veterans Affairs disability benefits that are received in a lump sum amount or in prospective monthly amounts;</p> <ul style="list-style-type: none"> <li>• Payments made by or authorized by a State Medicaid agency (including through a managed care entity) or other State or Federal agency to a family to enable a family member who has a disability to reside in the family's assisted unit. Authorized payments may include payments to a member of the assisted family through the State Medicaid agency (including through a managed care entity) or other State or Federal agency for caregiving services the family member provides to enable a family member who has a disability to reside in the family's assisted unit</li> <li>• The following types of trust distributions: <ul style="list-style-type: none"> <li>○ For an irrevocable trust or a revocable trust outside the control of the family or household excluded from the definition of net family assets): <ul style="list-style-type: none"> <li>▪ Distributions of the principal or corpus of the trust; and</li> <li>▪ Distributions of income from the</li> </ul> </li> </ul> </li> </ul>	

No.	Chapter Name Subject Area	Source	Summary of Change	Proposed Language	Effective Date
				<p>trust when the distributions are used to pay the costs of health and medical care expenses for a minor.</p> <ul style="list-style-type: none"> <li>○ For a revocable trust under the control of the family or household, any distributions from the trust; except that any actual income earned by the trust, regardless of whether it is distributed, shall be considered income to the family at the time it is received by the trust.</li> <li>• Payments related to aid and attendance for veterans under 38 U.S.C. 1521</li> </ul>	
8.	8.5 Student Financial Assistance	24 CFR 5.609(b) and PHA's MTW Plan	<ul style="list-style-type: none"> <li>• Updated non-MTW policy on student financial assistance for consistency with regulatory changes; created MTW policy for treatment of student financial assistance</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Non-MTW Policy:</b> Except for the financial assistance that is included in annual income per 24 CFR 5.609(b)(9), the full amount of student financial assistance paid directly to the student or the educational institution is excluded. PHA will exclude all student financial assistance received under 479B of the Higher Education Act and any other grant-in-aid, scholarship, or other assistance amounts for the actual covered costs charged by the institution.</li> <li>• <b>MTW Policy:</b> Using its MTW authority, PHA will exclude all student financial assistance. PHA will not verify student financial assistance as it is fully excluded.</li> </ul>	
9.	8.6 Guaranteed Income	PIH Notice 2023-27	<ul style="list-style-type: none"> <li>• Removed MTW policy on excluding</li> </ul>	<ul style="list-style-type: none"> <li>• HUD has stated that guaranteed income programs are considered nonrecurring income, which is</li> </ul>	

No.	Chapter Name Subject Area	Source	Summary of Change	Proposed Language	Effective Date
	Exclusion		guaranteed income	<p>required to be excluded under 24 CFR 5.609(b).</p> <ul style="list-style-type: none"> <li>For consistency with this change, PHA is removing its prior MTW policy allowing for the exclusion of income from a guaranteed income program.</li> </ul>	
10.	8.8 Income of Foster Children and Foster Adults	24 CFR 5.609(b)	<ul style="list-style-type: none"> <li>Revised income exclusion for foster children and adults</li> </ul>	<ul style="list-style-type: none"> <li>Income of a foster child or foster adult is excluded from annual income.</li> <li>Payments received for the care of foster children or foster adults, or State or Tribal kinship or guardianship care payments are excluded from annual income.</li> </ul>	
11.	Temporary and Sporadic Income	PIH Notice 2023-27	<ul style="list-style-type: none"> <li>Removed definition of temporary and sporadic income</li> </ul>	<ul style="list-style-type: none"> <li>The former exclusion of temporary, nonrecurring, and sporadic income has been replaced by nonrecurring income under the regulations at 24 CFR 5.603(b).</li> <li>The definition of nonrecurring income is included in 8.3 Annual Income Exclusions.</li> </ul>	
12.	8.9 Seasonal Worker	HOTMA Income and Assets Final Rule; 24 CFR 5.603	<ul style="list-style-type: none"> <li>Revised definition of seasonal worker for consistency with regulatory changes</li> </ul>	Income earned as a seasonal worker is included in annual income. A seasonal worker is defined as an individual who is: 1) hired into a short-term position and 2) the employment begins about the same time each year (such as summer or winter). Typically, the individual is hired to address seasonal demands that arise for the employer or industry. Some examples of seasonal work include employment limited to holidays or agricultural seasons. Seasonal work may include but is not limited to employment as a lifeguard, ballpark vendor, or snowplow driver. Seasonal work is not considered nonrecurring income and is therefore not excluded from income.	
13.	8.10 Day Laborer	HOTMA Income and Assets Final Rule; 24 CFR 5.603	<ul style="list-style-type: none"> <li>Added definition of day laborer for consistency with regulatory changes</li> </ul>	Income earned as a day laborer is included in the annual income. A day laborer is defined as an individual hired and paid one day at a time without an agreement that the individual will be hired or work again in the future. Income earned as a day laborer is not considered nonrecurring income and is therefore not excluded from income.	
14.	8.11	HOTMA	<ul style="list-style-type: none"> <li>Added</li> </ul>	Income earned as an independent	

No.	Chapter Name Subject Area	Source	Summary of Change	Proposed Language	Effective Date
	Independent Contractor	Income and Assets Final Rule; 24 CFR 5.603	definition of independent contractor for consistency with regulatory changes	contractor is included in annual income. An independent contractor is defined as an individual who qualifies as an independent contractor instead of an employee in accordance with the Internal Revenue Code federal income tax requirements and whose earnings are consequently subject to the self-employment tax. Examples include third-party delivery and transportation service providers; and individuals considered “gig workers,” such as babysitters, landscapers, rideshare drivers, and house cleaners. Income earned as an independent contractor is not considered nonrecurring income and is therefore not excluded from income.	
15.	8.16.5 Medical Expense Deduction	HOTMA Income and Assets Final Rule; 24 CFR 5.603	<ul style="list-style-type: none"> <li>Revised definition of health and medical expenses for consistency with regulatory changes</li> </ul>	Health and medical expenses may be deducted from annual income if they are eligible and not otherwise reimbursed and may only be deducted for elderly or disabled families. Health and medical care expenses, include costs incurred for the diagnosis, cure, mitigation, treatment, or prevention of disease or payments for treatments affecting any structure or function of the body. Health and medical care expenses include medical insurance premiums and long-term care premiums that are paid or anticipated during the period for which annual income is computed.	
<b>Chapter 10: Verification</b>					
16.	10.1 Consent to Release of Information (and 17.3.1 Failure to Provide Consent)	PIH Notice 2023-27	<ul style="list-style-type: none"> <li>Updated policy requiring family to sign the revised form HUD-9886 for consistency with changes to the form</li> </ul>	<ul style="list-style-type: none"> <li>Revised policy which requires a family to sign the form HUD-9886, the Authorization to Release of Information, to reflect that families now may revoke their consent to the form as it no longer expires after 15 months.</li> <li>However, if the family revokes their consent to the form, PHA must deny or terminate the family.</li> </ul>	
17.	10.3 General Verification Requirements	PIH Notice 2023-27	<ul style="list-style-type: none"> <li>Updated policy on the age of verification documents to reflect change in HUD</li> </ul>	<ul style="list-style-type: none"> <li><b>Non-MTW Policy.</b> Any documents used for verification (both income and family information documents) must be the original (not photocopies) and generally must be dated within <b>120</b> <del>60</del> calendar days of the date they are</li> </ul>	

No.	Chapter Name Subject Area	Source	Summary of Change	Proposed Language	Effective Date
			requirements	provided to PHA. PHA may accept scanned documents from third parties.	
18.	10.28 Verification of Student Financial Assistance	PIH Notice 2023-27; PHA's MTW Plan	<ul style="list-style-type: none"> <li>Added non-MTW and MTW policy for verifying student financial assistance</li> </ul>	<ul style="list-style-type: none"> <li><b>Non-MTW Policy.</b> If the family reports receiving only student financial assistance under Section 479B of the Higher Education Act (including but not limited to Federal Pell Grants, Teach Grants, Federal Work-Study Programs, and/or Federal Perkins Loans), PHA will not verify the student financial assistance as it will be fully excluded.  However, if the family reports receiving student financial assistance that is not included under Section 479B of the Higher Education Act, PHA will request that the family provide third-party verification of all student financial assistance (including both assistance under Section 479B and other student financial assistance); the verification must indicate both the source and amount of assistance. Additionally, PHA will request that the family provide third-party verification of the actual covered costs, which include the cost of tuition, books, supplies (including supplies and equipment to support students with learning disabilities or other disabilities), room and board, and fees required and charged to a student by an institution of higher education.</li> <li><b>MTW Policy.</b> PHA will not verify student financial assistance paid directly to the student or the educational institution, because the full amount of student financial assistance is excluded.</li> </ul>	
<b>Chapter 12: Continued Occupancy</b>					
19.	12.23.2 Nonrecurring Income	PHA	<ul style="list-style-type: none"> <li>Revised policy on required reporting of income increases for</li> </ul>	<ul style="list-style-type: none"> <li>Revised prior policy which required families to report increases in income between recertifications if they previously only reported receiving temporary or sporadic income.</li> </ul>	

No.	Chapter Name Subject Area	Source	Summary of Change	Proposed Language	Effective Date
			consistency with changes in the regulations	<ul style="list-style-type: none"> <li>Families who previously reported only receiving non-recurring income will now be required to report subsequent increases in income between recertifications.</li> </ul>	
<b>Appendix B</b>					
20.	Glossary of Public Housing Terms	24 CFR 5.609, 5.603, and 5.403	<ul style="list-style-type: none"> <li>Revised definitions for consistency with changes in the regulations</li> </ul>	<ul style="list-style-type: none"> <li>Revised the definition of annual income, dependent, family, and minor for consistency with changes in the regulations at 24 CFR 5.609, 5.603, and 5.403.</li> </ul>	
<b>Appendix F</b>					
21.	Federally Mandated Income Exclusions	89 FR 6126	<ul style="list-style-type: none"> <li>Revised mandatory income exclusions</li> </ul>	<ul style="list-style-type: none"> <li>Revised list of income exclusions mandated by federal statute for consistency with statutory changes</li> </ul>	



# SUMMARY OF HCV ADMINISTRATIVE PLAN CHANGES

May 2025

No	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
<b>Chapter 1: Overview of the Program and Plan</b>					
1.	1.4 Updating and Revising the Plan	PHA	<ul style="list-style-type: none"> <li>Expanded policy on revisions to the Admin Plan</li> </ul>	<p>Updated policy on revising the Admin Plan to include the following:</p> <ul style="list-style-type: none"> <li>PHA, from time to time, may make non-substantive changes and edits to the Administrative Plan to clarify policy language, address inconsistencies and simplify language. PHA may update the ACOP in order to comply with mandatory (non-discretionary) changes in the regulations and/or HUD requirements without Board approval.</li> </ul>	
<b>Chapter 4: Eligibility</b>					
2.	4.2.1 Family and Household	HOTMA Income and Assets Final Rule; 24 CFR 5.403	<ul style="list-style-type: none"> <li>Revised definition of family for consistency with regulatory changes</li> </ul>	<p>Revised definition of family for consistency with the regulations at 24 CFR 5.403:</p> <ul style="list-style-type: none"> <li>Family - Applicants must qualify as a “Family” as defined in 24 CFR part 5.403. Family includes, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identity, or marital status: <ul style="list-style-type: none"> <li>A single person, who may be:</li> <li>An elderly person, displaced person, disabled person, near-elderly person, or any other single person; or,</li> <li>An otherwise eligible youth who has attained at least 18 years of age and not more than 24 years of age and who has left foster care, or will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the</li> </ul> </li> </ul>	

No .	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
				<p>Social Security Act (42 U.S.C. 675(5)(H)), and is homeless or is at risk of becoming homeless at age 16 or older; or</p> <ul style="list-style-type: none"> <li>• A group of persons residing together, and such group includes, but is not limited to: <ul style="list-style-type: none"> <li>○ A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);</li> <li>○ An elderly family;</li> <li>○ A near-elderly family;</li> <li>○ A disabled family;</li> <li>○ A displaced family; and</li> <li>○ The remaining member of a tenant family.</li> </ul> </li> </ul>	
3.	4.2.6 Dependent	HOTMA Income and Assets Final Rule; 24 CFR 5.603	<ul style="list-style-type: none"> <li>• Revised definition of dependent for consistency with regulatory changes</li> </ul>	<p>A dependent is a member of the family (which excludes foster children and foster adults) other than the family head or spouse who is under 18 years of age, or is a person with a disability, or is a full-time student. Family members under the age of 18 years who are not the head or spouse are considered minors.</p>	
4.	4.2.11 Foster Children and Foster Adults	HOTMA Income and Assets Final Rule; 24 CFR 5.603	<ul style="list-style-type: none"> <li>• Revised definition of foster child and foster adult for consistency with regulatory changes</li> </ul>	<p>A foster child is a member of the household who meets the definition of a foster child under State law. In general, a foster child is placed with the family by an authorized placement agency (e.g., public child welfare agency) or by judgment, decree, or other order of any court of competent jurisdiction.</p> <p>Foster adult is a member of the household who is 18 years of age or older and meets the definition of a foster adult under State law. In general, a foster adult is a person who is 18 years of age or older, is unable to live independently due to a debilitating physical or mental condition and is placed</p>	

No	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
				with the family by an authorized placement agency or by judgment, decree, or other order of any court of competent jurisdiction.	
5.	4.5 Income Eligibility	PHA	<ul style="list-style-type: none"> <li>Added provision to the discussion of income eligibility</li> </ul>	Added provision to policy on income eligibility to permit PHA to admit a low-income family residing in a unit acquired through the MTW Expanding Affordable Housing Opportunities through Acquisitions program on the date that the property or unit is acquired by PHA.	
6.	4.7.4 Ineligible Citizens	HUD/DH S MOU (March 25, 2025)	<ul style="list-style-type: none"> <li>Clarified policy on ineligible non-citizens</li> </ul>	<p>Removed the following provisions related to policy on ineligible non-citizens:</p> <ul style="list-style-type: none"> <li>Ineligible non-citizens are those non-citizens who do not wish to contend their immigration status. PHA requires that non-citizens sign a certification attesting to their ineligible immigration status. PHA will not verify a family member's ineligible status and is not required to report an individual's unlawful presence in the U.S. to the United States Citizenship and Immigration Services (USCIS).</li> </ul>	
Chapter 8: Income and Adjusted Income					
7.	8.2 Annual Income	HOTMA Income and Assets Final Rule; 24 CFR 5.609(a)	<ul style="list-style-type: none"> <li>Revised provisions related to annual income for consistency with regulatory changes</li> </ul>	<p>Updated the following select provisions on included annual income:</p> <ul style="list-style-type: none"> <li>Annual income includes all amounts, monetary or not, which: <ul style="list-style-type: none"> <li>Received from all sources by each member of the family who is 18 years of age or older, the head of household, or spouse of the head of household, in addition to unearned income received by or on behalf of each dependent who is under 18 years of age. (Unearned income is defined as any annual income that is not earned income.) Go to, or on behalf of, the family head or spouse (even if</li> </ul> </li> </ul>	

No ·	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
				<p>temporarily absent) or to any other family member; or</p> <ul style="list-style-type: none"> <li>○ Which are not specifically excluded under 5.609(b) and the MTW Plan where applicable;</li> <li>⊖ All actual anticipated income from assets and the imputed returns on net family assets when the net family assets exceed \$50,000. Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access, except where otherwise excluded under MTW.</li> <li>• Annual income includes but is not limited to: <ul style="list-style-type: none"> <li>⊖ Earned income, which is defined as income or earnings from wages, tips, salaries, other employee compensation, and net income from self-employment. The full amount, before any payroll deductions, of wages and salaries, overtime pay, commissions, fees, tips and bonuses, and other compensation for personal services. Include employment income of an emancipated minor if the emancipated minor is the head of household, co-head or spouse.</li> <li>⊖ Interest, dividends, and other net income of any kind from real or personal property. Expenditures for</li> </ul> </li> </ul>	

No ·	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
				<p>amortization of capital indebtedness shall not be used as deductions in determining net income. of cash or assets will not be considered income when used to reimburse the family for cash or assets invested in the property.  <b>For MTW programs, see MTW policy on Asset Income):</b></p> <ul style="list-style-type: none"> <li>○ If the family has Net Family Assets less than \$5,000, Annual Income shall include the actual income from those assets;</li> <li>○ If the Family has Net Family Assets in excess of \$5,000, Annual Income shall include the greater of the actual income derived from all Net Family Assets or a percentage of the value of such Assets based on the current passbook saving's rate.</li> <li>○ Payments in lieu of earnings, such as unemployment and disability compensation, <b>worker's compensation</b>, and severance pay (See Income Exclusions concerning treatment of lump-sum additions as family assets);</li> <li>○ Periodic and determinable allowances, such as alimony and child support payments, and regular cash <b>and non-cash</b> contributions <b>or gifts</b> received from agencies or persons not residing in the dwelling made to or on behalf of family members;</li> </ul>	

No .	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
8.	8.3 Annual Income Exclusions	HOTMA Income and Assets Final Rule; 24 CFR 5.609(b)	<ul style="list-style-type: none"> <li>Revised definitions and discussion of income exclusions for consistency with the regulations; removed redundant provisions</li> </ul>	<p>Updated the following select provisions on income exclusions: Annual Income does not include the following:</p> <ul style="list-style-type: none"> <li>Earned income of children under 18 years of age, including emancipated minors who are not the head of household, co-head or spouse; <del>Income from the employment of children (including foster children) under the age of 18 years;</del></li> <li><del>Income from the employment of an emancipated minor if the emancipated minor is not the head of household, co head or spouse; Payments received for the care of foster children or foster adults, or State or Tribal kinship or guardianship care payments; (usually individuals with disabilities, unrelated to the client family, who are unable to live alone);</del></li> <li><del>Kinship and other similar state guardianship care payments. Kinship care, Kin GAP, and similar programs funded by states serve as an alternative to foster care placements. The compensation to participating relatives or legal guardians is comparable to the compensation to foster care parents. Payments for the care of foster children (including foster adults) are exempt from income.</del></li> <li><del>Lump sum additions to family assets, such as inheritances, insurance payments (including payments under health and accident insurance, and worker's compensation), capital gains, one-time lottery winnings, and settlement for personal property</del></li> </ul>	

No .	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
				<p>losses (see above if the payments are or will be periodic in nature). See section below for treatment of delayed or deferred periodic payments of Social Security or Supplemental Security Income benefits;</p> <ul style="list-style-type: none"> <li>• Insurance payments and settlements for personal or property losses, including but not limited to payments through health insurance, motor vehicle insurance, and workers' compensation;</li> <li>• Income of a live-in aide, provided the person meets the definition of a live-in aide, foster child or foster adult;</li> <li>• Certain amounts received that are related to participation in the following programs:</li> <li>• <del>Amounts received under HUD funded training programs (i.e., Step-up program: excludes stipends, wages, transportation payments, child care vouchers for the duration of the training);</del></li> <li>• Incremental earnings and benefits resulting to any family member from participation in training programs funded by HUD or in qualifying Federal, State, Tribal, or local employment training programs (including training programs not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded must be received under employment training programs with clearly defined goals and objectives and are excluded only for the period during which the family member participates in the employment training program unless those amounts are otherwise excluded;</li> </ul>	

No .	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
				<ul style="list-style-type: none"> <li>• Incremental earnings and/or benefits to any family member from participation in qualifying state or local employment training program (including training programs not affiliated with the local government), and training of family members as client management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for a limited period as determined in advance by PHA;</li> <li>• Income earned on amounts placed in a family's Family Self Sufficiency (FSS) account;</li> <li>• Temporary, non-recurring, or sporadic income (including gifts); Non-recurring income is income that has a discrete end date and will not be repeated beyond the coming year. Examples include income received as part of a pilot guaranteed income program, payments made to the family or to a third party on behalf of the family to assist with utilities, eviction prevention, security deposits to secure housing, payments for participation in research studies depending on the duration, and general one-time payments received by or on behalf of the family. Additionally, the following are considered nonrecurring income must be excluded: <ul style="list-style-type: none"> <li>○ Payments from the U.S. Census Bureau for employment lasting no longer than 180 days and not culminating in permanent employment;</li> </ul> </li> </ul>	



No .	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
				<ul style="list-style-type: none"> <li>○ Direct federal or state economic stimulus payments;</li> <li>○ Amounts directly received by the family as a result of state refundable tax credits or state tax refunds at the time they are received;</li> <li>○ Amounts directly received by the family as a result of federal refundable tax credits or federal tax refunds at the time they are received;</li> <li>○ Gifts for holidays, birthdays, or other significant life events or milestones (e.g., wedding, baby shower, or anniversary gifts);</li> <li>○ In-kind donations (e.g., food, clothing, or toiletries received from a food bank or similar organization); and</li> <li>○ Lump-sum additions to net family assets (e.g., lottery winnings, contest winnings, etc.).</li> </ul> <ul style="list-style-type: none"> <li>• Adoption assistance payments in excess of \$480 per adopted child the deduction amount for a dependent;</li> <li>• Deferred periodic payments of Supplemental Security Income and Social Security benefits that are received in a lump sum payment or in prospective monthly amounts, or any deferred Department of Veterans Affairs disability benefits that are received in a lump sum amount or in prospective monthly amounts;</li> <li>• Payments made by or authorized by a State Medicaid agency (including through a managed care entity) or other State or Federal</li> </ul>	

No .	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
				<p>agency to a family to enable a family member who has a disability to reside in the family's assisted unit. Authorized payments may include payments to a member of the assisted family through the State Medicaid agency (including through a managed care entity) or other State or Federal agency for caregiving services the family member provides to enable a family member who has a disability to reside in the family's assisted unit; and <del>Amounts paid by a State agency to a family with a developmentally disabled family member living at home to offset the cost of services and equipment needed to keep the developmentally disabled family member at home; and</del></p> <ul style="list-style-type: none"> <li>• The following types of trust distributions: <ul style="list-style-type: none"> <li>○ For an irrevocable trust or a revocable trust outside the control of the family or household excluded from the definition of net family assets: <ul style="list-style-type: none"> <li>▪ Distributions of the principal or corpus of the trust; and</li> <li>▪ Distributions of income from the trust when the distributions are used to pay the costs of health and medical care expenses for a minor.</li> </ul> </li> <li>○ For a revocable trust under the control of the family or household, any distributions from the trust; except that any actual income earned by</li> </ul> </li> </ul>	

No .	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
				<p>the trust, regardless of whether it is distributed, shall be considered income to the family at the time it is received by the trust.</p> <ul style="list-style-type: none"> <li>• Payments related to aid and attendance under 38 U.S.C. 1521 to veterans in need of regular aid and attendance</li> </ul>	
9.	8.5 Treatment of Student Financial Assistance	PHA's MTW Plan and 24 CFR 5.609(b)	<ul style="list-style-type: none"> <li>• Created MTW policy for treatment of student financial assistance; revised non-MTW policy for consistency with the regulations</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Non-MTW Policy:</b> Except for the financial assistance that is included in annual income per 24 CFR 5.609(b)(9), PHA will exclude all student financial assistance received under 479B of the Higher Education Act and any other grant-in-aid, scholarship, or other assistance amounts for the actual covered costs charged by the institution.</li> <li>• <b>MTW Policy:</b> Using its MTW authority, PHA will exclude all student financial assistance. PHA will not verify student financial assistance as it is fully excluded.</li> </ul>	
10.	8.7 Guaranteed Income Exclusion	PIH Notice 2023-27	<ul style="list-style-type: none"> <li>• Removed MTW policy on excluding guaranteed income</li> </ul>	<ul style="list-style-type: none"> <li>• HUD has stated that guaranteed income programs are considered nonrecurring income, which is required to be excluded under 24 CFR 5.609(b).</li> <li>• For consistency with this change, PHA is removing its prior MTW policy allowing for the exclusion of income from a guaranteed income program.</li> </ul>	
11.	8.8 Asset Income	PIH Notice 2023-27	<ul style="list-style-type: none"> <li>• Revised policy on asset income and removed previous MTW policy</li> </ul>	<ul style="list-style-type: none"> <li>• Updated policy on calculating asset income for consistency with changes in the regulation that increased the threshold to exclude assets from \$5,000 to \$50,000; removed prior MTW policy allowing PHA to exclude assets under \$50,000.</li> <li>• Revised discussion of calculating imputed asset income for consistency with HUD guidance.</li> </ul>	

No	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
12.	8.9 Income of Foster Children and Foster Adults	HOTMA Income and Assets Final Rule; 24 CFR 5.603	<ul style="list-style-type: none"> <li>Revised definition of foster child and foster adult for consistency with regulatory changes</li> </ul>	<ul style="list-style-type: none"> <li><del>Earned income of foster children is excluded from annual income.</del></li> <li>Income of a foster child or foster adult is excluded from annual income.</li> <li><del>Earned income of foster adults is included in annual income.</del></li> <li>Payments received for the care of foster children or foster adults, or State or Tribal kinship or guardianship care payments are excluded from annual income. Payments received for the care of foster children or foster adults (usually persons with disabilities, unrelated to the tenant family, who are unable to live alone) is excluded from annual income.</li> <li><del>All other income received on behalf of a foster child or foster adult is included in annual income. For example, if a foster adult receives SSI payments those payments are included in annual income.</del></li> </ul>	
13.	8.10 Temporary and Sporadic Income	PIH Notice 2023-27	<ul style="list-style-type: none"> <li>Removed definition of temporary and sporadic income</li> </ul>	<ul style="list-style-type: none"> <li>The former exclusion of temporary, nonrecurring, and sporadic income has been replaced by nonrecurring income under the regulations at 24 CFR 5.603(b).</li> <li>The definition of nonrecurring income is included in 8.3 Annual Income Exclusions.</li> </ul>	
14.	8.11 Seasonal Worker	HOTMA Income and Assets Final Rule; 24 CFR 5.603	<ul style="list-style-type: none"> <li>Revised definition of seasonal worker for consistency with regulatory changes</li> </ul>	Income earned as a seasonal worker is included in annual income. A seasonal worker is defined as an individual who is: 1) hired into a short-term position and 2) the employment begins about the same time each year (such as summer or winter). Typically, the individual is hired to address seasonal demands that arise for the employer or industry. Some examples of seasonal work include employment limited to holidays or agricultural seasons. Seasonal work may include but is not limited to employment as a lifeguard, ballpark vendor, or snowplow driver. Seasonal work is not	

No •	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
				considered nonrecurring income and is therefore not excluded from income.	
15.	8.12 Day Laborer	HOTMA Income and Assets Final Rule; 24 CFR 5.603	<ul style="list-style-type: none"> <li>Added definition of day laborer for consistency with regulatory changes</li> </ul>	Income earned as a day laborer is included in the annual income. A day laborer is defined as an individual hired and paid one day at a time without an agreement that the individual will be hired or work again in the future. Income earned as a day laborer is not considered nonrecurring income and is therefore not excluded from income.	
16.	8.13 Independent Contractor	HOTMA Income and Assets Final Rule; 24 CFR 5.603	<ul style="list-style-type: none"> <li>Added definition of independent contractor for consistency with regulatory changes</li> </ul>	Income earned as an independent contractor is included in annual income. An independent contractor is defined as an individual who qualifies as an independent contractor instead of an employee in accordance with the Internal Revenue Code federal income tax requirements and whose earnings are consequently subject to the self-employment tax. Examples include third-party delivery and transportation service providers; and individuals considered “gig workers,” such as babysitters, landscapers, rideshare drivers, and house cleaners. Income earned as an independent contractor is not considered nonrecurring income and is therefore not excluded from income.	
17.	8.19.5 Medical Expense Deduction	HOTMA Income and Assets Final Rule; 24 CFR 5.603	<ul style="list-style-type: none"> <li>Revised definition of health and medical expenses for consistency with regulatory changes</li> </ul>	Health and medical expenses may be deducted from annual income if they are eligible and not otherwise reimbursed and may only be deducted for elderly or disabled families. Health and medical care expenses, include costs incurred for the diagnosis, cure, mitigation, treatment, or prevention of disease or payments for treatments affecting any structure or function of the body. Health and medical care expenses include medical insurance premiums and long-term care premiums that are paid or anticipated during the period for which annual income is computed.	
<b>Chapter 10: Verification</b>					
18.	10.1 Consent to Release	PIH Notice	<ul style="list-style-type: none"> <li>Updated policy requiring</li> </ul>	<ul style="list-style-type: none"> <li>Revised policy which requires a family to sign the form HUD-9886, the Authorization to Release of</li> </ul>	

No	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
	Information (and 20.7 Termination Due to Failure to Provide Consent)	2023-27	family to sign the revised form HUD-9886 for consistency with changes to the form	<p>Information, to reflect that families now may revoke their consent to the form as it no longer expires after 15 months.</p> <ul style="list-style-type: none"> <li>However, if the family revokes their consent to the form, PHA must deny or terminate the family's assistance.</li> </ul>	
<b>Chapter 13: Leasing Policies and HAP Contract</b>					
19.	13.12 Lease and Tenancy Addendum	PHA	<ul style="list-style-type: none"> <li>Updated provisions to clarify relationship between the lease and PHA HCV Tenancy Addendum</li> </ul>	<p>Revised the following language to clarify owner lease requirements and that the PHA HCV Tenancy Addendum will govern in the event of a conflict with the owner's lease:</p> <p><del>Owners are not required to use PHA's standard lease agreement. The owner is permitted to use their own lease; the owner's lease must conform to the content requirements described below and comply with State and local law. PHA may review the lease to determine if the lease complies with State and local law and may decline to approve the tenancy if the PHA determines that the lease does not comply with State or local law.</del></p> <p>The lease offered by the owner must be approvable and must include the required PHA HCV Tenancy Addendum, included in Part C of the PHA HAP Contract. <del>Owners may include, upon PHA review and approval, another lease addendum; however, the owner's lease addendum may not supersede the PHA HCV Tenancy Addendum.</del></p> <p><del>Owners, upon PHA approval, may require that the tenant sign another lease addendum provided the owner's lease addendum may not supersede the PHA HCV Tenancy Addendum.</del></p>	

No .	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
				<p>The Owner's lease must include:</p> <ul style="list-style-type: none"> <li>• The names of the owner and the tenant;</li> <li>• The unit rented (address, apartment number, and any other information needed to identify the contract unit);</li> <li>• The term of the lease (initial term and any provisions for renewal);</li> <li>• The amount of the monthly rent to owner; and</li> <li>• A specification of what utilities and appliances are to be supplied by the owner, and what utilities and appliances are to be supplied by the family.</li> </ul> <p>If there are any conflicts between the required PHA HCV Tenancy Addendum and the lease agreement, the provisions of the PHA HCV Tenancy Addendum will supersede the conflicting provisions of the lease. For example, if the lease includes provisions which the PHA HCV Tenancy Addendum expressly prohibit (i.e. charging an assisted tenant extra amounts for items provided at no cost to unassisted tenants), the provisions of the PHA HCV Tenancy Addendum will govern.</p> <p>Additionally, if the owner fails to include the required information listed above in the lease, the provisions of the required PHA HCV Tenancy Addendum will govern. The tenant family has the right to enforce the PHA HCV Tenancy Addendum against the owner.</p>	
Chapter 15: Payment Standards and Utility Allowances					

No.	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
20.	15.4 Changes in Payment Standards	24 CFR 982.505(c)(3) and (4)	<ul style="list-style-type: none"> <li>Revised policy on applying increase in the payment standards for consistency with the regulations</li> <li>Clarified policy on applying decreases</li> <li>Removed MTW policies on changes in the payment standard</li> </ul>	<ul style="list-style-type: none"> <li>If there is a decrease in the payment standard amount during the term of the HAP contract, PHA will not reduce the payment standard amount for the family for as long as the family continues to reside in the unit.</li> <li>If there is an increase in the payment standard amount during the term of a HAP contract, PHA may apply the increase at any time after the effective date of the increase.</li> </ul>	
<b>Chapter 16: Continued Occupancy</b>					
21.	16.13.2 Utility Allowance Schedule and Payment Standard at Interim Recertification	24 CFR 982.505(c)(3)	<ul style="list-style-type: none"> <li>Revised policy on applying changes in the payment standards for consistency with the regulations</li> </ul>	<ul style="list-style-type: none"> <li>Revised prior policy which required PHA to apply the payment standard in effect at the last regular recertification when processing an interim recertification, regardless of changes in the payment standard amount during the HAP contract.</li> <li>PHA will now apply increases in the payment standard amount at interim recertification. If the payment standard amount has decreased, PHA will apply the payment standard in effect at the last regular recertification.</li> </ul>	
22.	16.15.2 Nonrecurring Income	PIH Notice 2023-27	<ul style="list-style-type: none"> <li>Revised policy on required reporting of income increases for consistency with changes in the</li> </ul>	<ul style="list-style-type: none"> <li>Revised prior policy which required families to report increases in income between recertifications if they previously only reported receiving temporary or sporadic income.</li> <li>Families who previously reported only receiving non-recurring income will now be required to report subsequent increases in income between recertifications.</li> </ul>	



No .	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
			regulations		
<b>Chapter 23: Special Programs and Allocations</b>					
23.	23.3 Family Unification Program	PIH 2025-08	<ul style="list-style-type: none"> <li>Revised policy on Family Unification Program (FUP) for consistency with revised HUD requirements</li> </ul>	<ul style="list-style-type: none"> <li>Revised provisions related to eligibility to increase the timeframe for youth leaving foster care. Youth leaving foster care within 180 days are now eligible for a FUP voucher.</li> <li>Updated discussion of partnership MOU to indicate that the City of Philadelphia Office of Homeless Services (OHS) is now a party to this agreement.</li> <li>Revised provisions related to waiting list management to indicate that PHA's HCV residency preference does not apply to the FUP program.</li> <li>Added provisions on voucher issuance to specify policies on the voucher term and extensions for consistency with the PIH Notice 2025-08.</li> </ul>	
24.	23.4 Mainstream Vouchers	PIH Notice 2020-01	<ul style="list-style-type: none"> <li>Updated policy on Mainstream Vouchers to provide information on partners</li> </ul>	<ul style="list-style-type: none"> <li>Added provisions related to partnerships and supportive services to indicate that PHA has entered into an agreement with the City of Philadelphia Office of Homeless Services (OHS) and Liberty Resources for administering the Mainstream Voucher program.</li> </ul>	
25.	23.15 Foster Youth to Independence (FYI) Program	PIH 2025-08	<ul style="list-style-type: none"> <li>Revised policy on Foster Youth to Independence program for consistency with revised HUD requirements</li> </ul>	<ul style="list-style-type: none"> <li>Added provisions related to waiting list management to indicate that PHA's HCV residency preference does not apply to the FYI program.</li> <li>Revised provisions on voucher issuance to specify policies on the voucher term and extensions for consistency with the PIH Notice 2025-08.</li> </ul>	

No .	Chapter Name Subject Area	Source	Summary of Change	Proposed Admin Plan	Effective Date
<b>Chapter 24: Unit Based Program</b>					
26.	24.31.1 Families Residing in Scattered Sites Units	PHA MTW Plan	<ul style="list-style-type: none"> <li>Clarified policy on phased in rent increases for families residing in scattered sites who experience a TTP increase as a result of conversion to UBV</li> </ul>	<ul style="list-style-type: none"> <li>If, as a result of the conversion, the current household's monthly <b>Total Tenant Payment (TTP)</b> will increase by more than the greater of 10 percent or \$25, the increase may be phased in over three (3) years. If a current household was paying ceiling rent immediately prior to conversion, PHA will use the ceiling rent amount to calculate the initial (Year 1) phase-in amount.</li> </ul>	
<b>Appendix B</b>					
27.	Glossary of Subsidized Housing Terms	24 CFR 5.603	<ul style="list-style-type: none"> <li>Updated definitions for consistency with regulatory changes</li> </ul>	<ul style="list-style-type: none"> <li>Revised the definition of annual income, dependent, health and medical expenses, and minor for consistency with changes in the regulations at 24 CFR 5.603.</li> </ul>	
<b>Appendix F</b>					
28.	Federally Mandated Income Exclusions	89 FR 6126	<ul style="list-style-type: none"> <li>Revised mandatory income exclusions</li> </ul>	<ul style="list-style-type: none"> <li>Revised list of income exclusions mandated by federal statute for consistency with statutory changes</li> </ul>	