National Update CAHI

AHMA NCH Annual Conference 2025

California Affordable Housing Initiatives and CGI Federal

Generally Speaking

- Business as usual
- PBCA has submitted proposed MOR workplan to HUD HQ for review and approval. Properties scheduled per risk-based rules (and HUD SF requests)
- Continue processing CR, RA, Vouchers, claims
- Contact Center will continue to take tenant/applicant concerns and work with OA to resolve

HUD MEMO DATED 2/6/24

- TSP must be updated for HOTMA policies **but not** implemented until TRACS 203a is released, HUD posts new documents, the site has TRACS 203a software working, and the site implements their full HOTMA policy. Their current TSP must be used until then.
- EIV P&P must be updated per HOTMA policy. **However**, O/A should continue to use EIV with their pre-HOTMA policy.
- O/A MUST not evict per the HOTMA asset limitation until the new Model Leases are posted and the family signs that new lease.
- If an O/A chooses to implement any HOTMA policy, TRACS Software will not accommodate the changes in calculations. Therefore, O/A must use the rent override feature to update the rents per their HOTMA policy and calculations.

HOTMA CONTINUED...

- O/As that implement any HOTMA policy must update the tenant file with all HOTMA policies implemented as per the documentation requirement listed in the Memo distributed on 2/6/2024
- HUD continues to provide flexibility, O/A can choose to implement any of the
 available passbook rates. The PBCA accepts vouchers with the chosen passbook
 rate and the MOR reviewer will use the O/A passbook rate when calculating
 income from assets.
- The remainder of the variable HOTMA allowances and thresholds posted with a 1/1/25 effective date must not be used – unless the Owner is choosing to implement these. If they choose to implement – they must manually override rents in TRACS for all certifications and update the tenant file with all HOTMA policy utilized.
- HUD email dated 6/3/2025: Full Compliance 1/1/2026

HUD HQ EMAIL 6/3/2025



HOTMA Final Rule Compliance Date Extended to January 1, 2026

Office of Housing sent this bulletin at 06/03/2025 08:42 AM EDT

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HOTMA Final Rule Compliance Date Extended

Today, the Office of Multifamily Housing Programs published a <u>Housing Notice</u> extending the Housing Opportunity Through Modernization Act of 2016 (HOTMA) compliance date from July 1, 2025, **to January 1, 2026**, for all owners participating in HUD Multifamily project-based rental assistance programs. Full compliance with the HOTMA final rule and discretionary policies is mandatory for all certifications with a January 1, 2026, date or later.

Owners may become fully compliant with HOTMA rules and regulations prior to January 1, 2026, by using the rent override function in the Tenant Rental Assistance Certification System (TRACS). Owners should continue to follow their existing Tenant Selection Plans (TSP) and Enterprise Income Verification (EIV) policies and procedures until they are fully compliant with HOTMA.

For questions regarding this notice please contact MFH_HOTMA@hud.gov.

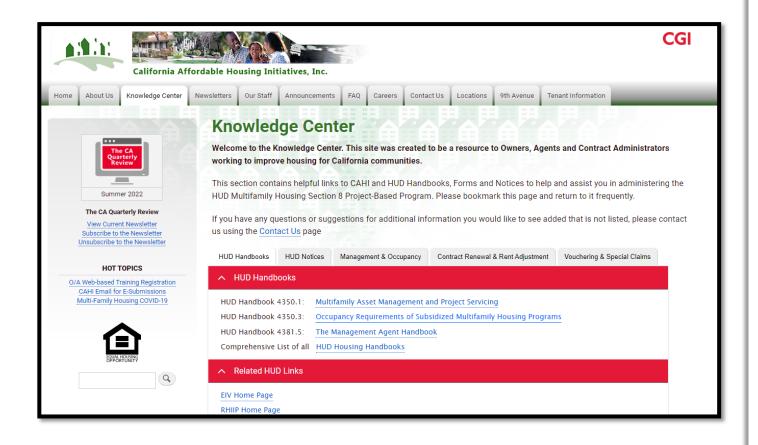
HOTMA Implementation

- HUD 2023-10
 - First update MFH Owner's software to be 203A compliant
 - Once a MFH Owner's software is 203A compliant then
 - 60 days notice to tenants that their lease will be modified at the end of the lease term *after* the expiration of the 60 days' notice.
 - Once proper notice is given, MFH Owners must begin using the revised Model Leases at the expiration of a family's lease term.
- HUD 2/2024 Memo on what an OA is to do while waiting for HUD to update TRAC and publish applicable forms (see slides 4 and 5)



Resources

 CAHI Website – Knowledge Center <u>www.cahi-Oakland.org</u>

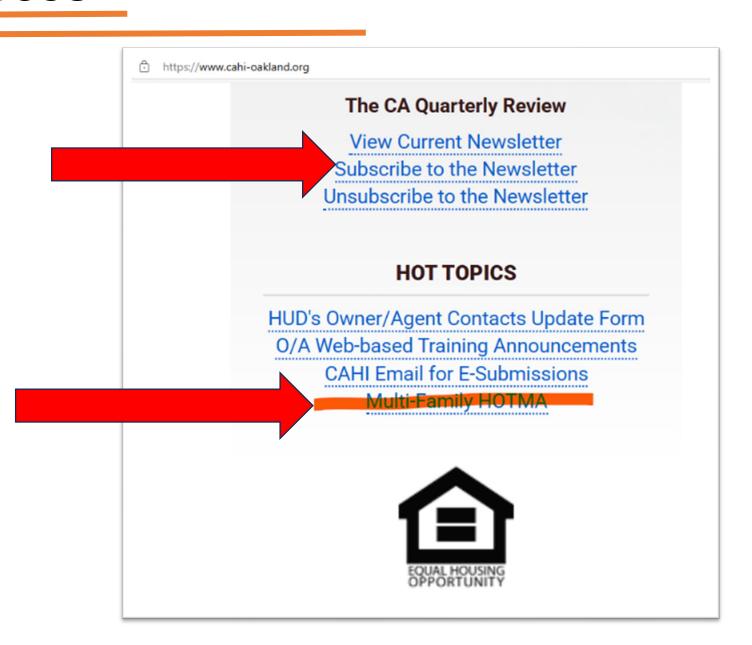




HOTMA Resources

 Also subscribe, you'll get our quarterly newsletter and you may also get occasional important announcements

 Link on CAHI's homepage to HUD's HOTMA resources





QUESTIONS?





Thank you so much for attending!

