

PUBLIC NOTICE

**Public Notice of Significant Amendment to the Housing Choice Voucher
Administrative Plan**

**Housing Choice Voucher Administrative Plan – Proposed Change
Fiscal Year 2026
Effective: July 1, 2025**

Chapter 5

Remove/Addition

documentation of any claimed preference.

Applicants will be required to complete a full application and sign it, unless assistance is needed or a request for accommodation is made by a person with a disability.

G. ASSISTANCE TO FAMILIES WHO CLAIM DISCRIMINATION

CMHA will direct families to complete the HUD Form 903 to file a complaint, and to contact the local fair housing agency.

H. VERIFICATION [24 CFR 982.201(e)]

Information provided by the applicant will be confirmed in accordance with the procedures detailed in the "Verification Procedures" chapter. Family composition, income, allowances and deductions, assets, full-time student status, eligibility and rent calculation factors, and other pertinent information will be verified. ~~All requested verifications must be dated within 60 days of voucher issuance.~~

Guidance issued in Notice 2023-27, Section J.5.a., states that an original or authentic document generated by a third-party source dated within 120 days of the date received by the PHA, is considered acceptable third-party verification. For fixed income sources, a statement dated within the appropriate benefit year is acceptable documentation. PHAs are required to verify a family's income eligibility within 60 days prior to voucher issuance for the tenant-based voucher program and prior to admission for the PBV program. Previously, documents were required to be dated within 60 days of the date received by the PHA.

Failure to return the requested verifications by the due date provided may result in a family's application for housing being withdrawn. If the application for housing is withdrawn, the family will have to wait until the next opening to reapply.

CHAPTER 6

Verification Procedures

[24 CFR Part 5, Subparts B, D, E and F; 24 CFR 982.158, 24 CFR 5.617]

PHILOSOPHY

HUD regulations require the factors of eligibility and Total Tenant Payment/Family Share (TTP) be verified by CMHA. CMHA's verification requirements are designed to maintain program integrity.

POLICY

CMHA will obtain proper authorization from the family before requesting information from independent sources.

CMHA staff will use Enterprise Income Verification system (EIV) to streamline the verification of a family's income. This will be the first method of verifying and validating tenant reported information. EIV will not be pulled for interim certifications.

Applicants and program participants must provide true and complete information to CMHA whenever information is requested.

After the verification process is completed, CMHA will make a final determination of eligibility. This decision will be based upon information provided by the family, the verification completed by CMHA, and the current eligibility criteria in effect. If the family is determined to be eligible, CMHA will issue a voucher at the eligibility appointment.

This chapter explains CMHA's procedures and standards for verification of preferences, income, assets, allowable deductions, family status, and changes in family composition.

A. METHODS OF VERIFICATION AND TIME ALLOWED [24 CFR 982.516]

CMHA will verify information through the four methods of verification acceptable to HUD in the following order in accordance with its verification procedures:

- 1 Enterprise Income Verification (EIV) as mandated by 24 CFR 5.233
- 2 Upfront Income Verification (UIV)
2. Third-Party Written "Tenant-provided verification"
3. ~~Third-Party Oral~~ Written
4. Certification/Self-Declaration

Chapter 6

Remove/Replace

The family must supply any information requested by CMHA or HUD for use in a regularly scheduled reexamination or interim reexamination of family income and composition in accordance with HUD requirements.

Rejection of Tenant Provided Documents

CMHA may reject tenant provided documentation when:

- Document provided is not an original.
- Original document has been altered, mutilated, or is not legible; or
- Document appears to be a forged document or does not appear to be authentic.

CMHA must analyze all data (EIV data, third-party verification and other documents/information provided by the family).

CMHA will review historical income data for patterns of employment, paid benefits, and/or receipt of other income, when the CMHA cannot readily anticipate income, such as in cases of seasonal employment, unstable working hours, and suspected fraud.

CMHA will use the most current verified income data (and historical income data if appropriate) to calculate anticipated annual income.

Comments

~~HUD recommends that applicant provided documents should be dated within 60 days of the PHA interview date. For applicants, verifications may not be dated more than 60 calendar days prior to the time of voucher issuance. For participants, verifications may not be dated more than 60 calendar days old at the time of completion of recertification.~~

Guidance issued in Notice 2023-27, Section J.5.a., states that an original or authentic document generated by a third-party source dated within 120 days of the date received by the PHA, is considered acceptable third-party verification. For fixed income sources, a statement dated within the appropriate benefit year is acceptable documentation. PHAs are required to verify a family's income eligibility within 60 days prior to voucher issuance for the tenant-based voucher program and prior to admission for the PBV program. Previously, documents were required to be dated within 60 days of the date received by the PHA.

If the PHA is unable to verify historical annual income using current information due to historical fluctuations in income, the PHA may average amounts received/earned to anticipate annual income.

Note that if the tenant disputes EIV Social Security (SS)/ Supplemental Security Income (SSI) benefit data, the PHA should request the tenant to provide the PHA with a current, original Social Security Administration (SSA) notice or benefit letter within

Chapter 6

Remove

Resources for Historical Income Data:

Social Security Earnings Statement (summary of gross earnings for each year that the participant has worked in their lifetime) may be obtained from the Social Security Administration. Requests for this document may be done via mail or online at www.ssa.gov.

Two years of earnings may be obtained from the EIV System or local State Wage Information Collection Agency (SWICA). This information is only available to PHAs in states where the local SWICA has entered into an agreement with HUD to obtain wage and unemployment compensation data.

Last eight (8) amounts of Social Security benefits paid to a participant (or household member) may be obtained from the EIV system.

CMHA will allow seven (7) business days for return of third-party verifications before going to the next method. CMHA will document the file as to why third-party written verification was not received.

~~For applicants, verifications may not be dated more than 60 calendar days old at the time of voucher issuance. For participants, verifications may not be dated more than 90 calendar days old at the time of completion of recertification.~~

Third-Party Written Verification

Third-party verification is used to verify information directly with the source.

Verifications received electronically directly from the source are considered third-party written verifications.

CMHA will accept third-party verifications in the form of computerized printouts, pay stubs and letters from the employer on employer letterhead delivered by the family from the following:

Social Security Administration	Employers
Unemployment Compensation Board	City or County Courts
Veterans Administration	Welfare Assistance
Financial Institutions	Medical Providers/Pharmacies

Credit Reports

When CMHA conducts annual/interim reviews of zero-income families, CMHA may run a credit report with a release signed by the family.

Chapter 6

Remove/Revise

Third-Party Oral Verification

Oral third-party verification will **may** be used when written third-party "tenant-provided verification" is not received upon request or is not possible. When third-party oral verification is used, staff will be required to initiate contact and to complete an oral verification form, noting with whom they spoke, the date of the conversation, and the facts provided.

Third-Party Written "Tenant-Provided Verification"

CMHA will accept tenant-provided information as the primary source, unless the provided documentation is not an original, appears to have been forged, has been mutilated or the documentation is not legible.

All such documents, excluding government checks, will be photocopied and retained in the applicant file.

CMHA will accept the following documents from the family provided that the document is such that tampering would be easily noted:

- Consecutive and original pay stubs.
- Social Security Administration Award Letter.
- Bank statements.
- Pension benefit statements.
- Temporary Assistance to Needy Families (TANF) Award Letter.
- Other official and authentic documents from a federal, state, or local agency.
- Computer printouts from the employer.
- Signed letters (provided that the information is confirmed by phone); and
- Other documents noted in this Chapter as acceptable verification.

If third-party verification is received after documents have been accepted as provisional verification, and there is a discrepancy, CMHA will utilize the third-party verification.

- CMHA will accept electronic documents.
- CMHA will accept photocopies when appropriate.

Self-Certification/Self-Declaration

When verification cannot be made by EIV, third-party verification or review of documents, families will be required to submit a self-certification. Self-certification requires an affidavit certification statement under penalty of perjury.

REVISION – Chapter 12

Remove-Addition

Rent adjustment requests for mid-month move-ins (e.g., September 15) will be granted no earlier than a year from the first of the month following move-in (e.g., October 1).

Any contract rent adjustment form that is received by CMHA prior to the expiration of the initial lease term will be rejected by CMHA. The requests will not be “stored” or “kept on file” by CMHA. The owner will need to resubmit the request at the appropriate time in order for the request to be considered.

~~CMHA will negotiate rent adjustments requested by owners implementing a 7% maximum cap over the previous year's approved rental amount, if reasonable and affordable to voucher holders.~~ In the event of financial constraints, CMHA may implement a rent adjustment CAP.

An interim certification will be completed by CMHA effective for the first of the month following the processing of the certification and proper notice to the client. CMHA will provide a 30-day notice to the family if the adjustment increases the tenant's rental portion.

Any requested adjustment in rent will be subject to rent reasonableness requirements. See 24 CFR 982.503. If the rent assessment is lower than what the owner is currently receiving, CMHA will adjust the rent to that amount in accordance with HUD regulations.

In instances where the landlord alleges to have submitted a rent adjustment request that is not in possession of the housing authority, the burden of proof will lie with the landlord. Acceptable forms of proof include but are not limited to copy of an e- mail properly addressed to HCV staff, fax confirmation sheet, a date-stamped receipt from CMHA or a return receipt from the post office. Contract rent adjustments will not be made effective retroactively unless an exception has been approved by HCV Management for extenuating circumstances.

CMHA reserves the right to suspend, terminate or refuse to enter into a contract with a property owner who has provided CMHA with misleading, false or fraudulent information/documents regarding a unit or tenant.

Excess Payments

The total of rent paid by the tenant plus CMHA's Housing Assistant Payment to the owner may not be more than the total approved rent. The owner may not demand or accept any rent payment from the tenant in excess of this total approved rent payment from the tenant unless said payment was preauthorized by CMHA. The owner must immediately return any excess payments made by or on behalf of the family to the tenant.

Owners who do not return excess payments will be subject to penalties as outlined in the "Owner or Family Debts to CMHA" chapter of this Administrative Plan.

Owners must also promptly credit and/or refund to the tenant family any overpayments made by the family for their share of the rent. Failure to do so will be considered a program violation.

New Chapter 21 - ADDITION

CHAPTER 21 Special Programs

PHILOSOPHY

CMHA partners with various Service Providers, Hamilton County and City of Cincinnati to provide housing assistance to individual and families in special populations.

A. HUD- VASH PROGRAM

Veteran's Administrative Supportive Housing Voucher (HUD-VASH)

HUD-VASH is a collaborative program between the Cincinnati Metropolitan Housing Authority and the Veteran's Administration (VA) which combines HUD housing vouchers with VA supportive services to help Veterans and their families who are homeless find and sustain permanent housing. HUD provides rental assistance vouchers for privately owned housing to Veterans who are eligible for VA health care services and are experiencing homelessness. VA case managers may connect these Veterans with supportive services such as health care, mental health treatment and substance abuse counseling to help them in their recovery process and with their ability to maintain housing in the community. This program operates under most of the same rules that pertain to the HCV vouchers.

CMHA is proud to partner with the Veteran's Administration to provide subsidies to 447 veteran families through the HUD-Veterans Affairs Supportive Housing (HUD-VASH) Program.

HUD-VASH made available additional administrative fees under the HCV Funding Implementation Notice which the Cincinnati Metropolitan Housing Authority applied and received \$142,707. These administrative fees must be used exclusively to support the HUD-VASH program for two purposes: (1) cost incurred by the PHA in carrying out administrative responsibilities under the program and (2) other eligible expenses in administering the program. The administrative activities include front-line, day-to-day operational activities including but not limited to applicant intake, lease-up activities, income determinations and reexaminations, unit inspections, disbursing HAP to landlords, financial management and record-keeping and reporting. Administrative activities also include housing search assistance activities such as pre-move counseling, assisting a family identify and visiting potentially available units during their housing search, helping a family find a unit that meets the household's disability-related needs, providing transportation and direction, and assisting with the completion of rental applications. Additional administrative activities include owner

New Chapter 21 - Addition

recruitment and outreach activities, security deposit assistance, utility deposit assistance/utility arrears, application fees/non-refundable administrative or processing fees/refundable application deposit assistance/broker fees, holding fees and renter's insurance if required by the lease.

Any funds awarded will be distributed based on the above HUD-VASH guidelines. The VA will provide a referral and CMHA will review for compliance. CMHA will then distribute the funds to the participants. The HUD-VASH additional fees under the HCV Funding Implementation Notice will be distributed on a first come first serve basis until the funds have been depleted. CMHA may apply for additional HUD-VASH funding when it becomes available.

B. FOSTERING YOUTH INDEPENDENCE (FYI) PROGRAM

The population eligible to be assisted under this program are families certified by HCJFS as meeting the following conditions:

1. Families for whom the lack of adequate housing is a primary factor in the imminent placement of the family's child, or children, in out-of-home care; or the delay in the discharge of the child, children, to the family from out-of-home care; and
2. Youth at least 18 years and not more than 24 years of age (have not reached their 25th birthday), who 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 and are homeless or are at risk of becoming homeless at age 18 or older. As required by statute, a FUP/FYI voucher issued to such a youth may only be used to provide housing assistance for the youth for a maximum of 36 months. (Entities eligible to use FUP/FYI vouchers awarded under this NOFA included but is not limited to PHAs approved for participation in the Family Unification Program and Family Self-Sufficiency Demonstration pursuant to Notice PIH 2016-01.)

Foster Youth to Independence Eligibility

The population eligible to be assisted under this agreement (MOU) are youth certified by the HCJFS as meeting the following conditions:

1. Has attained at least 18 years and not more than 24 years of age (have not reached their 25th birthday);
2. 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 at age 18 or older; and
3. Is homeless or is at risk of becoming homeless as these terms are defined at 24 CFR 578.3 and 24 CFR 578.2;

As required by statute, and FYI voucher issued to such a youth may only be used to provide housing assistance for the youth for a maximum of 36 months unless the youth meets the requirements to receive an extension of assistance under the **Fostering Stable Housing Opportunities (FSHO)** amendments. FSHO provides an FYI youth an extension of the 36-month time limit for up to an additional 24 months if they meet certain requirements.

Eligibility is not limited to single person. For example, pregnant and/or parenting youth are eligible to receive assistance under this notice assuming they otherwise meet eligibility

New Chapter 21 - Addition

requirements.

Mandatory Program Policies

This section describes the mandatory waivers and alternative requirements that HUD is establishing for FUP and FYI vouchers. A summary of the mandatory waivers and alternative requirements.

- a. **Timing of Referral of Youth Leaving Foster Care.** HUD is waiving Section 8(x)(2) of the United States Housing Act of 1937 (42 U.S.C. 1437f(x)(2)), which allows in part, for otherwise eligible youth to be referred if they will leave foster care within 90 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act. HUD is establishing an alternative requirement to ensure otherwise eligible youth to be referred when leaving foster care within 180 days, in accordance with a transition plan described in section 475(5)(H) of the Social Security Act. This alternative requirement will allow more time for the youth to find housing with a FUPY/FYI voucher and prevent the youth from entering into homelessness.

HUD recognizes that a longer referral timeframe may increase the likelihood that a youth lease a unit prior to their exit from foster care. A FUPY or FYI youth may lease a unit prior to officially leaving foster care in order to ensure a smooth transition from foster care to independence, as long as all requirements of the FUP and FYI programs and HCV program are met. Please note that while a youth may be referred for a FUPY or FYI voucher before reaching the age of 18, the PHA must not enter into a HAP contract on behalf of the youth until the youth reach the age of 18. Further, the FUP and FYI programs are subject to the prohibition of a family receiving "any other duplicative federal, State or local housing subsidy, as determined by HUD" so any arrangements made to help the youth secure a unit and avoid any lapse in housing must be consistent with the requirement (24CFR 982.352(c)(12)) and state law regarding the provision of foster care.

- b. **Initial Search Term.** HUD is waiving 24 CFR 982.303(a) and 24 CFR 982 subpart H, which requires an initial search term of at least 60 days which also applies to a participant's request to move to a new unit. HUD is establishing an alternative requirement that the initial search term for FUP and FYI vouchers must be at least 120 days from the date the voucher is issued. The initial 120-day term also applies when a family or youth chooses to move to a new unit with continued assistance inside or outside the PHA's jurisdiction. Many FUP and FYI applicants face challenges in their housing search. On average, national voucher median search times indicate that FUP and FYI applicants take longer to lease than other HCV applicants. The lack of available affordable housing coupled with the challenges in finding units and navigating the leasing process, especially for youth, experiencing or at risk of homelessness, may require applicants to need additional time to search for suitable unit. Families may also experience additional delays due to finding a location that is close to schools, transportation, services, and other family factors.

When issuing a FUP and/or FYI voucher to a family which includes an individual with disabilities, PHAs also must include a current listing of available accessible units know to the PHA, and if necessary, otherwise assist the family in locating an available accessible dwelling unit (24 CFR 8.28(a)(3)). In HUD's past FUP and FYI Notices of Funding Availability/Opportunity (NOFA/NOFO), HUD stressed the importance of housing search assistance for families and youth, as applicable, in the form of landlord introductions, neighborhood tours and unit viewings, as best practices to help youth and families quickly find housing that will meet their needs.

New Chapter 21 - Addition

- c. Extension of Term.** HUD is waiving 24 CFR 982.303(b)(1), which at its discretion, the PHA may grant a family one or more extensions of the initial voucher term in accordance with PHA policy as described in the PHA Administrative Plan. Any extension of the term is granted by PHA notice to the family. HUD is establishing an alternative requirement for the process of requesting search extensions. Given the challenges FUP and FYI applicants may face in securing a unit, applicants should be provided with flexible extension policies. PHAs must adopt an extension policy for FUP and FYI applicants that include the following: 1) each extension must be for a minimum of 90 days, 2) the PHA must approve the first extension request, regardless of how the request is made (written or oral) or when it is made, as long as the request is made on or before the term expiration date and is consistent with applicable requirements; subsequent requests should be processed in accordance with the PHA's administrative plan; and 3) the PHA must, on at least one occasion after voucher issuance, notify the applicant prior to the initial term expiration, to remind them about the term expiration date and process for requesting an extension of the initial term, and to inquire if the applicant is in need of assistance with their housing search.

CMHA will grant extension of the initial 120-day term (24 CFR 982.303(b)(1)) and must provide written/oral requests prior to the expiration. Request for extensions can be submitted to applicant portal at myinfo@cintimah.com. CMHA will not restrict first extension approval to certain circumstances or require documentation from applicants. For all extension requests, written or oral requests are sufficient. This requirement also applies to current FUP and FYI participants who choose to move to a new unit with continued assistance inside or outside the PHA's jurisdiction, in accordance with 24 CFR 982 subpart H. CMHA may approve up to three extension requests based on a case-by-case basis.

Hamilton County Jobs and Family Services provide housing assistance services in housing searches. In providing assistance with locating suitable housing, CMHA offers Rental Connection which is listed on the Event Calendar for confirmation of dates and times on CMHA's [website](http://www.hcs-jfs.com). The Rental Connection provides a location for landlords who have vacant units to meet potential participants/applicants searching for housing.

CMHA recognizes that a family or youth with a disability requires additional time to search for their unit. 24 CFR 982.303(b)(2) requires PHA to provide an extension as reasonable accommodation and PHAs must provide this information during the family briefing (24 CFR 982.301(a)).

Local Preferences. While PHAs may establish local preferences based on local housing needs and priorities (24 CFR 982.207(a)), HCV regulations do not permit PHAs to establish separate preferences for FUP and FYI applicants. Preference applies to all applicants on the waiting list. HUD is waiving 24 CFR 982.207(a)(1) and establishing an optional waiver permitting PHAs to establish separate preferences for FUP and FYI applicants. CMHA has chosen this option regarding separate preferences for FUP and FYI applicants.

New Chapter 21 - Addition

Emergency Housing Vouchers (EHV)

Emergency Housing Vouchers (EHV) assist individuals and families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability.

EHVs are tenant-based vouchers, which operate as others in the Housing Choice Voucher (HCV) Program, with the exception that the funding is separate, and apart from the regular HCV program. CMHA works with the local Continuum of Care, Strategies to End Homelessness, on the administration and referral of families for EHV assistance.

HUD has notified PHA that this program will sunset as of December 31, 2026. CMHA will transition these families to tenant-based vouchers to continue to provide housing assistance for the families on the program.

EHV Mitigation Program

While not all families that participate with an assisted housing program causes damages to a unit, the Mitigation Incentive Program allows property owners to make a claim if damages do occur, beyond normal wear and tear of a unit upon an EHV family vacating. These funds are for use where damages beyond normal wear and tear exceeds the security deposit amount for the unit. Property owners will have to request a "Move-out" inspection of the unit within 10 days of the family vacating the unit. CMHA will inspect the unit to assess the damages and determine if the damages are beyond normal wear and tear of the tenancy. After the assessment of the damages, CMHA will confirm with the owner if they are eligible to submit a claim for reimbursement of the costs of the repairs after the application of the security deposit towards the damages.

Property owners must submit the Damage Claim Request to CMHA. Property owners must have all work completed by a licensed professional and must submit receipts for the amounts paid. CMHA has the sole discretion in determining eligibility and approval for payment of these funds. Payments will not be made for normal wear and tear of a unit or for routine unit "make ready" costs, tools needed to repair damages, items allegedly stolen, or damages not represented in the move-in/out condition report.

If payment is approved, the property owner agrees to not pursue any other damages against the family. The request for these damages are capped at a maximum amount of \$2,500.00 per assisted family. CMHA may consider multiple claims from owners, as a lack of lease enforcement, and could influence the owner's future participation with the program. Property Managing agents may request a claim on behalf of an owner but funds will only be paid to the owner of the unit. This program is only for families with an Emergency Housing Voucher leased between 9/1/2022 – 9/1/2023 or until EHV special funding were expended.

New Chapter 21 - Addition

Near Elderly/Disabled NED2

The Non-Elderly Disabled (NED) program provides rental assistance for individuals under 62 with disabilities. It's part of the [Housing Choice Voucher Program](#) (Section 8) and helps individuals find and pay for affordable, private rental housing. The program focuses on assisting non-elderly individuals with disabilities and their families in obtaining safe and decent housing.

Mainstream

Mainstream vouchers assist non-elderly adult [persons](#) with disabilities. Aside from serving a special population, Mainstream vouchers are administered using the same rules as other housing choice vouchers. Funding and financial reporting for Mainstream vouchers is separate from the regular tenant-based voucher program.