

| Change ID                                      | 2026 Admin Plan Chapter & Section                        | 2026 Policy                                                                                                                     | Updated 2027 Admin Plan Chapter & Section                | 2027 Policy                                                                                                                                                                                                                                                                                                 | Type of Change               | Summary of Change                                                                                              | Change Driver          | Notes                                                                 |
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| CHAPTER 00- INTRODUCTION                       |                                                          |                                                                                                                                 |                                                          |                                                                                                                                                                                                                                                                                                             |                              |                                                                                                                |                        |                                                                       |
| 00-001                                         | Introduction – HOTMA Changes in the Administrative Plan  | Describes HOTMA Sections 102/104 implementation delays, pending transition to HIP, and early adoption of certain policies.      | Introduction – HOTMA Changes in the Administrative Plan  | Updates HOTMA implementation guidance by clarifying that Form HUD-50058 information will be submitted through HUD's electronic reporting system, explains that full compliance remains dependent on HIP implementation, and identifies July 1, 2025 as the implementation date for selected HOTMA policies. | Regulatory Update            | HOTMA Implementation                                                                                           | HUD Required           | Updates implementation guidance based on HUD's latest direction.      |
| 00-002                                         | Introduction – HOTMA Voucher Final Rule                  | Describes implementation deadlines for the 2024 HOTMA Voucher Final Rule.                                                       | Section Removed                                          | Removes implementation guidance that is no longer applicable because the compliance deadlines have passed.                                                                                                                                                                                                  | Removed – Obsolete Guidance  | HOTMA Compliance Timeline                                                                                      | Administrative Cleanup | Removes outdated regulatory guidance.                                 |
| 00-003                                         | Introduction – NSPIRE and HQS in the Administrative Plan | Explains transition from HQS to NSPIRE with an October 1, 2025 implementation deadline.                                         | Introduction – NSPIRE and HQS in the Administrative Plan | Updates NSPIRE implementation guidance by incorporating Notice PIH 2024-26 REV-1, extending the mandatory implementation deadline to January 31, 2027, clarifying continued regulatory use of the term "Housing Quality Standards (HQS)," and explaining when HQS and NSPIRE chapters apply.                | Regulatory Update            | NSPIRE Implementation                                                                                          | HUD Required           | Reflects revised HUD implementation schedule and guidance.            |
| 00-004                                         | Introduction – Resources and References                  | Lists HUD resources, notices, and reference materials.                                                                          | Introduction – Resources and References                  | Updates reference materials and resource links, including expanded EIV resources and current HUD reference information.                                                                                                                                                                                     | Reference Update             | HUD References                                                                                                 | Administrative Cleanup | No policy change; updates supporting resources.                       |
| CHAPTER 01- ADMIN PLAN OVERVIEW                |                                                          |                                                                                                                                 |                                                          |                                                                                                                                                                                                                                                                                                             |                              |                                                                                                                |                        |                                                                       |
| 01-001                                         | 1-II.A. Overview and History of the Program              | Summarizes HOTMA implementation through the 2024 HOTMA Voucher Final Rule.                                                      | 1-II.A. Overview and History of the Program              | Adds reference to the December 8, 2025 technical amendments to the HOTMA Voucher Final Rule.                                                                                                                                                                                                                | Reference Update             | HOTMA Rule Update                                                                                              | HUD Required           | Updates historical regulatory background.                             |
| 01-002                                         | 1-II.A. Overview and History of the Program              | Summarizes HOTMA implementation through the 2024 HOTMA Voucher Final Rule.                                                      | 1-II.A. Overview and History of the Program              | Revised history of the program section to include information on full HOTMA compliance                                                                                                                                                                                                                      | Reference Update             | HOTMA Rule Update                                                                                              | HUD Required           | Updates historical regulatory background.                             |
| 01-003                                         | 1-III.B. Contents of the Plan                            | Administrative Plan must include occupancy policies addressing family definitions and criminal activity standards.              | 1-III.B. Contents of the Plan                            | Expands required occupancy policy topics to include residency policies for foster children, foster adults, live-in aides, additional admission/termination authorities, and PHA consent requirements.                                                                                                       | Regulatory Update            | Occupancy Policy Requirements                                                                                  | HUD Required           | Actual policy details will be tracked in Chapters 3 and 12.           |
| 01-004                                         | 1-III.B. Contents of the Plan                            | Administrative Plan must address payment standards.                                                                             | 1-III.B. Contents of the Plan                            | Adds requirement to address Small Area Fair Market Rent (SAFMR) adoption and designated payment standard areas, if applicable.                                                                                                                                                                              | Regulatory Update            | Payment Standards / SAFMR                                                                                      | HUD Required           | Substantive payment standard policy will be documented in Chapter 16. |
| 01-005                                         | 1-III.B. Contents of the Plan                            | Administrative Plan must address interim redeterminations of family income and composition.                                     | 1-III.B. Contents of the Plan                            | Expands required policies to include frequency of income determinations, income determination practices, and acceptance of family asset declarations.                                                                                                                                                       | Regulatory Update            | Income Determinations                                                                                          | HUD Required           | Actual procedures will be tracked in Chapter 11.                      |
| 01-006                                         | 1-III.B. Contents of the Plan                            | Administrative Plan includes housing quality standards inspection requirements.                                                 | 1-III.B. Contents of the Plan                            | Adds new required inspection policy topics, including life-threatening deficiencies, initial inspection flexibilities, alternative inspections, owner reinspection fees, HAP withholding, and relocation assistance.                                                                                        | Regulatory Update            | NSPIRE / Inspection Requirements                                                                               | HUD Required           | Detailed inspection policies will be tracked in Chapter 8.            |
| 01-007                                         | 1-III.B. Contents of the Plan                            | No requirement regarding multiple Requests for Tenancy Approval (RFTA) or HAP contract prioritization during funding shortages. | 1-III.B. Contents of the Plan                            | Adds Administrative Plan requirements addressing multiple RFTAs and prioritization of HAP contract terminations during insufficient funding.                                                                                                                                                                | Regulatory Update            | Leasing & Funding Requirements                                                                                 | HUD Required           | Substantive policies will be tracked in Chapters 9 and 12             |
| CHAPTER 02- FAIR HOUSING AND EQUAL OPPORTUNITY |                                                          |                                                                                                                                 |                                                          |                                                                                                                                                                                                                                                                                                             |                              |                                                                                                                |                        |                                                                       |
| 02-001                                         | 2-I.B. Nondiscrimination                                 | Equal Access Rule cited under 24 CFR 5.105(a)(2).                                                                               | 2-I.B. Nondiscrimination                                 | Adds language explaining HUD has halted enforcement of the Equal Access Rule, rescinded PIH 2014-20, proposed eliminating the regulation to align with Executive Order 14168, and notes OMB review.                                                                                                         | Regulatory Update            | Updates nondiscrimination guidance to reflect current federal actions regarding Equal Access Rule enforcement. | HUD Required           |                                                                       |
| 02-002                                         | 2-I.C. Discrimination Complaints                         | VAWA complaint procedures not addressed.                                                                                        | 2-I.C. Discrimination Complaints                         | Adds an entirely new VAWA complaint processing section, filing timeframes, FHEO procedures, and FH responsibilities.                                                                                                                                                                                        | New Policy                   | Establishes formal VAWA complaint procedures.                                                                  | HUD Required           |                                                                       |
| 02-003                                         | 2-III.A. LEP                                             | Based primarily on 2007 LEP Guidance.                                                                                           | 2-III.A. OVERVIEW                                        | Adds Executive Order 14224 and July 2025 DOJ/OAG guidance declaring English the official language while acknowledging Title VI and state/local language access obligations.                                                                                                                                 | Regulatory Update            | Updates LEP policy to reflect new federal guidance on language access.                                         | HUD Required           |                                                                       |
| 02-004                                         | 2-III.A. OVERVIEW                                        | Based primarily on 2007 LEP Guidance.                                                                                           | 2-III.A. OVERVIEW                                        | Added clarified language regarding enforcement actions on national origin discrimination per FHEO memo 9/19/2025                                                                                                                                                                                            | Regulatory Update            | Updates policy on National origin discrimination                                                               | HUD Required           |                                                                       |
| CHAPTER 03- ELIGIBILITY                        |                                                          |                                                                                                                                 |                                                          |                                                                                                                                                                                                                                                                                                             |                              |                                                                                                                |                        |                                                                       |
| 03-001                                         | Introduction                                             | HOTMA asset restriction listed as future implementation.                                                                        | Introduction                                             | Updates introductory eligibility requirements to include HOTMA net asset restrictions.                                                                                                                                                                                                                      | Regulatory Update            | Updates eligibility requirements for HOTMA implementation.                                                     | HUD Required           |                                                                       |
| 03-002                                         | Introduction                                             | HOTMA asset restriction listed as future implementation.                                                                        | Introduction                                             | Removed language calling out policy that will apply upon the HOTMA compliance date                                                                                                                                                                                                                          | Regulatory Update            | Administrative Clarification                                                                                   | HUD Required           |                                                                       |
| 03-003                                         | 3-I.B Family and Household                               | Lists definitions of family and households.                                                                                     | 3-I.B Family and Household                               | Citations added to align with Model Plan                                                                                                                                                                                                                                                                    | Administrative Clarification | Administrative Clarification                                                                                   | HUD Required           |                                                                       |
| 03-004                                         | 3-I.K. Foster Children & Foster Adults                   | General policy allowing foster occupants.                                                                                       | 3-I.K. Foster Children & Foster Adults                   | Adds required Administrative Plan policy defining when PHA consent may be granted or denied for foster children and foster adults.                                                                                                                                                                          | Policy Revision              | Clarifies approval criteria for foster occupants.                                                              | HUD Required           |                                                                       |

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| 03-005                                      | 3-I.L. Absent Family Members – Definitions of Temporarily and Permanently Absent | A family member who was absent or expected to be absent from the assisted unit for <b>180 consecutive days or less</b> was generally considered temporarily absent and remained a family member. An absence of more than <b>180 consecutive days</b> was generally considered permanent, unless an exception applied. | 3-I.L. Absent Family Members – Definitions of Temporarily and Permanently Absent                                                                                                                           | Reduces the temporary absence period from <b>180 consecutive days to 60 consecutive days</b> . A family member absent for more than <b>60 consecutive days</b> will generally be considered permanently absent and removed from the household, unless an exception applies. | Summary of Changes           | Establishes a shorter timeframe for determining household composition and ensures absent household members are addressed more promptly. | Fresno Housing Discretionary | Exceptions remain for absent students, foster-care placements, certain employment-related absences, and permanent medical confinement. The family must obtain PHA approval before a previously removed adult family member returns to the household |
| 03-006                                      | 3-I.M. Live-in Aide                                                              | Live-in aide approval process described.                                                                                                                                                                                                                                                                              | 3-I.M. Live-in Aide                                                                                                                                                                                        | Adds timeframes for identifying a live-in aide, replacement deadlines, extensions, background check requirements, and voucher reduction procedures if no aide is identified.                                                                                                | Policy Revision              | Establishes timelines for live-in aide approval and replacement.                                                                        | Fresno Housing Policy        |                                                                                                                                                                                                                                                     |
| 03-007                                      | 3-II.A Overview                                                                  | Overview of regulations on Denial of Assistance                                                                                                                                                                                                                                                                       | 3-II.A Overview                                                                                                                                                                                            | Added clarification regarding criminal background checks per Notice PIH 2012-28 to align with Model Plan                                                                                                                                                                    | Regulatory Update            | Provides clarification                                                                                                                  | HUD Required                 |                                                                                                                                                                                                                                                     |
| 03-008                                      | 3-II.B. Citizenship or Eligible Immigration Status                               | Standard citizenship verification.                                                                                                                                                                                                                                                                                    | 3-II.B. Citizenship or Eligible Immigration Status                                                                                                                                                         | Adds HUD Secretary guidance encouraging proof of citizenship and new DHS reporting requirements for individuals determined to be unlawfully present.                                                                                                                        | Regulatory Update            | Updates citizenship verification and reporting requirements.                                                                            | HUD Required                 |                                                                                                                                                                                                                                                     |
| 03-009                                      | 3-II.B. Citizenship or Eligible Immigration Status                               | Standard citizenship verification.                                                                                                                                                                                                                                                                                    | 3-II.B. Citizenship or Eligible Immigration Status                                                                                                                                                         | Added citation to align with Model Plan                                                                                                                                                                                                                                     | Administrative Clarification | Updates citizenship verification and reporting requirements.                                                                            | HUD Required                 |                                                                                                                                                                                                                                                     |
| 03-010                                      | 3-II.B. Citizenship or Eligible Immigration Status                               | Standard citizenship verification.                                                                                                                                                                                                                                                                                    | 3-II.B. Citizenship or Eligible Immigration Status                                                                                                                                                         | Added clarifying language to align with Model plan                                                                                                                                                                                                                          | Administrative Clarification | Updates citizenship verification and reporting requirements.                                                                            | HUD Required                 |                                                                                                                                                                                                                                                     |
| 03-011                                      | 3-II.D. Family Consent                                                           | Consent forms required.                                                                                                                                                                                                                                                                                               | 3-II.D. Family Consent                                                                                                                                                                                     | Adds HOTMA policy allowing the PHA to deny admission if an applicant revokes consent for financial institution asset verification.                                                                                                                                          | New Policy                   | Implements HOTMA financial records consent requirement.                                                                                 | HUD Required                 |                                                                                                                                                                                                                                                     |
| 03-012                                      | 3-III.B Mandatory Denial of Assistance                                           | Policy on Mandatory denials                                                                                                                                                                                                                                                                                           | 3-III.B Mandatory Denial of Assistance                                                                                                                                                                     | Removed language calling out policy that will apply upon the HOTMA compliance date                                                                                                                                                                                          | Regulatory Update            | Administrative Clarification                                                                                                            | HUD Required                 |                                                                                                                                                                                                                                                     |
| 03-013                                      | 3-III.E Screening                                                                | Policy on screening for eligibility                                                                                                                                                                                                                                                                                   | 3-III.E Screening                                                                                                                                                                                          | Added clarification regarding criminal background checks for applicants who have lived out of state per Notice PIH 2012-28 to align with Model Plan                                                                                                                         | Regulatory Update            | Administrative Clarification                                                                                                            | HUD Required                 |                                                                                                                                                                                                                                                     |
| CHAPTER 04 - APPLICATIONS AND INTEREST LIST |                                                                                  |                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                             |                              |                                                                                                                                         |                              |                                                                                                                                                                                                                                                     |
|                                             | Chapter 04 - APPLICATIONS AND INTEREST LIST                                      | Complete and full re-organization of Chapter 4 to align with the Model Admin Plan, Chapter 4 sections.                                                                                                                                                                                                                |                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                             |                              |                                                                                                                                         |                              |                                                                                                                                                                                                                                                     |
| 04-001                                      | Chapter Introduction                                                             | Chapter described waiting list policies.                                                                                                                                                                                                                                                                              | Chapter Introduction                                                                                                                                                                                       | Updates terminology throughout the chapter from Waiting List to Interest List where applicable and clarifies the two-step process of creating a waiting list from the interest list through random lottery selection.                                                       | Administrative Clarification | Interest List Terminology                                                                                                               | Administrative Cleanup       | Improves consistency with FH's current application process.                                                                                                                                                                                         |
| 04-002                                      | 4-I.B. Applying for Assistance                                                   | Application procedures referenced the waiting list process.                                                                                                                                                                                                                                                           | Clarifies that applicants first submit a pre-application for placement on the Interest List and that eligibility is determined only after selection for the full application process.                      | Clearly distinguishes between pre-application and full eligibility determination.                                                                                                                                                                                           | Summary of Changes           | Policy Revision                                                                                                                         | Fresno Housing Discretionary | Better defines the admissions process.                                                                                                                                                                                                              |
| 04-003                                      | 4-I.B. Applying for Assistance                                                   | General application methods were described but not consolidated.                                                                                                                                                                                                                                                      | Consolidates and clarifies all acceptable methods for submitting a pre-application, including online, phone, mail, in-person, and other methods identified in the public notice.                           | Improves flexibility and clearly communicates available application methods.                                                                                                                                                                                                | Summary of Changes           | Administrative Clarification                                                                                                            | Fresno Housing Discretionary | Clarifies existing practice.                                                                                                                                                                                                                        |
| 04-004                                      | 4-I.B. / 4-I.C. Reasonable Accommodation                                         | Reasonable accommodation language was limited.                                                                                                                                                                                                                                                                        | Adds language confirming FH will provide reasonable accommodations during the pre-application process without requiring disability verification when the disability is known or readily apparent.          | Improves accessibility and clarifies existing reasonable accommodation procedures.                                                                                                                                                                                          | Summary of Changes           | Administrative Clarification                                                                                                            | HUD Required                 | Supports Fair Housing and ADA compliance.                                                                                                                                                                                                           |
| 04-005                                      | 4-I.D Placement on the Waiting List                                              | Eligibility determination occurred before placement on the waiting list.                                                                                                                                                                                                                                              | 4-I.D Placement on the Interest List                                                                                                                                                                       | Clarifies that applicants are first placed on the Interest List, with eligibility determined during the full application process after lottery selection. Families found eligible are then placed on the waiting list.                                                      | Policy Revision              | Interest List Process                                                                                                                   | Fresno Housing Discretionary | Better reflects FH's existing lottery process.                                                                                                                                                                                                      |
| 04-006                                      | 4-II.B Organization of the Waiting List                                          | Waiting list requirements were described generally.                                                                                                                                                                                                                                                                   | 4-II.B Organization of the Interest List                                                                                                                                                                   | Adds detailed description of information collected on the pre-application, including contact information, disability accessibility needs, and use of a single interest/waiting list for City and County HCV programs.                                                       | Administrative Clarification | Interest List Administration                                                                                                            | Fresno Housing Discretionary | Primarily documents current administrative procedures.                                                                                                                                                                                              |
| 04-007                                      | 4-II.B. Organization of the Interest List                                        | Interest List structure was less detailed.                                                                                                                                                                                                                                                                            | Establishes the minimum information required for each applicant on the Interest List and clarifies that local preferences are verified during the full application process rather than at pre-application. | Improves consistency and efficiency in maintaining applicant information.                                                                                                                                                                                                   | Summary of Changes           | Policy Revision                                                                                                                         | Fresno Housing Discretionary | Clarifies applicant record requirements.                                                                                                                                                                                                            |
| 04-008                                      | 4-II.C. Opening the Interest List                                                | Public notice requirements were more general.                                                                                                                                                                                                                                                                         | Expands public notice requirements to identify application methods, limitations on who may apply, and procedures when the closing date has not yet been determined.                                        | Provides greater transparency and flexibility during Interest List openings.                                                                                                                                                                                                | Summary of Changes           | Administrative Clarification                                                                                                            | Fresno Housing Discretionary | Improves public communication requirements.                                                                                                                                                                                                         |
| 04-009                                      | 4-II.C. Project-Based Voucher Interest Lists                                     | PBV waiting list procedures were limited.                                                                                                                                                                                                                                                                             | Adds policies governing site-based PBV Interest Lists and referral-based PBV admissions, including referrals through the Coordinated Entry System (CES) and other approved partners.                       | Documents current PBV admission practices and HUD guidance.                                                                                                                                                                                                                 | Summary of Changes           | New Policy                                                                                                                              | HUD Required                 | Expands policies for PBV-specific admissions.                                                                                                                                                                                                       |

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| 04-010                                           | 4-II.E. Applicant Status While on Interest List                           | Applicants were expected to maintain current information.                                                                                                                                                                                                                                                             | Requires applicants to update mailing address, email address, and preferences within 10 business days using the Applicant Portal and respond to FH requests to maintain active status.                | Improves the accuracy of applicant information and communication.                                                                                                                                                                      | Summary of Changes           | Policy Revision                  | Fresno Housing Discretionary | Formalizes Applicant Portal update requirements.               |
| 04-011                                           | 4-II.E. Applicant Portal                                                  | Applicant Portal references were limited.                                                                                                                                                                                                                                                                             | Establishes the Applicant Portal as the primary method for applicants to review and update personal information and indicate continued interest.                                                      | Supports electronic communication and self-service functionality.                                                                                                                                                                      | Summary of Changes           | New Policy                       | Fresno Housing Discretionary | Documents FH's electronic applicant management process.        |
| 04-012                                           | Chapter Organization                                                      | Application, Interest List, and eligibility provisions were dispersed throughout the chapter.                                                                                                                                                                                                                         | Reorganizes the chapter into clearer sections covering the pre-application process, managing the Interest List, selection for admission, full application processing, and eligibility determinations. | Improves readability and aligns the chapter with FH's workflow.                                                                                                                                                                        | Internal Use Only            | Organizational Change            | Administrative Cleanup       | Organizational improvement only; no substantive policy change. |
| 04-013                                           | Fair Housing Policy                                                       | Fair Housing is covered in Chapter 2: Fair Housing and Equal Opportunity                                                                                                                                                                                                                                              | Removed from Chapter 4                                                                                                                                                                                | Removed from Chapter 4                                                                                                                                                                                                                 | Internal Use Only            | Organizational Change            | Administrative Cleanup       | Organizational improvement only; no substantive policy change. |
| 04-014                                           | Application by Web Application, phone, email and in-person                | These are old pre-application intake methods<br>May be considered as a Reasonable Accommodation                                                                                                                                                                                                                       | Removed from Chapter 4                                                                                                                                                                                | Removed from Chapter 4                                                                                                                                                                                                                 | Internal Use Only            | Organizational Change            | Administrative Cleanup       | Organizational improvement only; no substantive policy change. |
| 04-015                                           | Waiver Request - Streamlined Admission to the HCV Waiting List            | EHV Preferences have already been adopted and applied to EHV families.                                                                                                                                                                                                                                                | Removed from Chapter 4                                                                                                                                                                                | Removed from Chapter 4                                                                                                                                                                                                                 | Internal Use Only            | Organizational Change            | Administrative Cleanup       | Organizational improvement only; no substantive policy change. |
| CHAPTER 05 - BRIEFINGS AND VOUCHER ISSUANCE      |                                                                           |                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                       |                                                                                                                                                                                                                                        |                              |                                  |                              |                                                                |
| 05-001                                           | 5-I.B Briefing                                                            | Required oral briefing before voucher issuance.                                                                                                                                                                                                                                                                       | 5-I.B Briefing                                                                                                                                                                                        | Expands briefing options to include remote briefings by telephone, video conferencing, and other virtual platforms.                                                                                                                    | Regulatory Update            | Remote Briefings                 | HUD Required                 | Incorporates PIH 2020-32 guidance.                             |
| 05-002                                           | 5-I.B Briefing                                                            | LEP accommodations referenced generally.                                                                                                                                                                                                                                                                              | 5-I.B Briefing                                                                                                                                                                                        | Adds policies regarding use of bilingual staff, community resources, responsible use of AI technology, machine translation, and LEP interpretation services during briefings.                                                          | Regulatory Update            | Accessibility & LEP              | HUD Required                 | Expands accessibility guidance.                                |
| 05-003                                           | 5-I.B Conducting Remote Briefings                                         | No detailed remote briefing procedures.                                                                                                                                                                                                                                                                               | 5-I.B Conducting Remote Briefings                                                                                                                                                                     | Establishes procedures for technology assessments, alternate briefing methods, electronic briefing packets, protection of personally identifiable information (PII), and accommodations for participants unable to access technology.  | New Policy                   | Remote Briefing Procedures       | HUD Required                 | New operational procedures.                                    |
| 05-004                                           | Briefing Packet Requirements                                              | Existing HUD-required packet contents.                                                                                                                                                                                                                                                                                | Briefing Packet Requirements                                                                                                                                                                          | Expands required briefing packet contents to include exception payment standards as a reasonable accommodation, accessibility resources, housing opportunity information, portability information, and updated fair housing materials. | Regulatory Update            | Briefing Packet Requirements     | HUD Required                 | Reflects updated HUD requirements.                             |
| 05-005                                           | 5-II. D Voucher Issuance                                                  | Policy on issuing vouchers to applicants                                                                                                                                                                                                                                                                              | 5-II. D Voucher Issuance                                                                                                                                                                              | Clarified that the PHA may rescind the voucher for insufficient funding with HUD approval                                                                                                                                              | Policy Revision              | Insufficient Funding Methodology | HUD Required                 | Insufficient Funding                                           |
| CHAPTER 06 B - INCOME AND SUBSIDY DETERMINATIONS |                                                                           |                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                       |                                                                                                                                                                                                                                        |                              |                                  |                              |                                                                |
| 06B-001                                          | Chapter 6 A                                                               | Pre HOTMA                                                                                                                                                                                                                                                                                                             | Chapter 6 B                                                                                                                                                                                           | Chapter 6B will now be known as Chapter 6                                                                                                                                                                                              | HOTMA Applicability          | HOTMA Applicability              | HUD Required                 | Clarifies applicability of Chapters 6A and 6B.                 |
| 06B-002                                          | Chapter Introduction                                                      | HOTMA chapter introduced upon implementation.                                                                                                                                                                                                                                                                         | Chapter Introduction                                                                                                                                                                                  | Clarifies that Chapter 6B applies upon the PHA's HOTMA compliance date and supersedes Chapter 6A after implementation.                                                                                                                 | Administrative Clarification | HOTMA Applicability              | HUD Required                 | Clarifies applicability of Chapters 6A and 6B.                 |
| 06B-003                                          | 6-I.B Household Composition and Income- Temporarily Absent Family Members | A family member who was absent or expected to be absent from the assisted unit for <b>180 consecutive days or less</b> was generally considered temporarily absent and remained a family member. An absence of more than <b>180 consecutive days</b> was generally considered permanent, unless an exception applied. | 6-I.B Household Composition and Income                                                                                                                                                                | Revises temporary absence threshold from 60 days to 180 consecutive days for determining permanent absence of family members, except where other policy exceptions apply.                                                              | Policy Revision              | Temporary Absence                | Fresno Housing Discretionary | Significant local policy revision.                             |
| 06B-004                                          | 6-I.C Calculating Annual Income                                           | Annual income projected using anticipated income.                                                                                                                                                                                                                                                                     | 6-I.C Calculating Annual Income                                                                                                                                                                       | Expands guidance for projecting anticipated income, documenting rationale, addressing known future income changes, and accommodating hardship requests when projecting income.                                                         | Regulatory Update            | Income Determinations            | HUD Required                 | Implements HOTMA income calculation guidance.                  |
| 06B-005                                          | 6-I.E Earned Income Disallowance                                          | EID policies remained active.                                                                                                                                                                                                                                                                                         | 6-I.E Earned Income Disallowance                                                                                                                                                                      | Removes obsolete EID provisions by recognizing the sunset of the Earned Income Disallowance after January 1, 2026, while preserving protections for previously eligible families through the applicable transition period.             | Removed – Obsolete Guidance  | Earned Income Disallowance       | HUD Required                 | HOTMA transition requirement.                                  |
| 06B-006                                          | 6-I.E/F Business and Self-Employment Income                               | Business income guidance.                                                                                                                                                                                                                                                                                             | 6-I.F Business and Self-Employment Income                                                                                                                                                             | Adds detailed guidance regarding independent contractors, gig workers, business expansion, capital indebtedness, withdrawals from business assets, and co-owned businesses when determining annual income.                             | Regulatory Update            | Business Income                  | HUD Required                 | Expands HOTMA business income policies.                        |
| 06B-007                                          | 6-I.G Student Financial Assistance                                        | Previous student financial assistance guidance.                                                                                                                                                                                                                                                                       | 6-I.F Student Financial Assistance                                                                                                                                                                    | Updates treatment of Title IV Higher Education Act assistance and HOTMA student financial assistance requirements, distinguishing treatment based on household composition and student status.                                         | Regulatory Update            | Student Financial Assistance     | HUD Required                 | Implements revised HOTMA student income rules.                 |

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| 06B-008                           | 6-I.G Student Financial Assistance                                                  | Previous student financial assistance guidance.      | 6-I.F Student Financial Assistance                                                  | Minor clarifications regarding student financial assistance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Regulatory Update            | Student Financial Assistance    | HUD Required                 | Implements revised HOTMA student income rules.                                                                    |
| 06B-009                           | 6-I.H Periodic Payments- Alimony and Child Support                                  | No previous description                              | 6-I.G Periodic Payments- Alimony and Child Support                                  | Added clarifications regarding Alimony and Child Support per Notice PIH 2023-27                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Regulatory Update            | Alimony and child support       | HUD Required                 | Alimony and child support description                                                                             |
| 06B-010                           | 6-I.M Additional Exclusions from Annual Income                                      | List of income exclusions                            | 6-I.L Additional Exclusions from Annual Income                                      | updated to align with Model Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Administrative Clarification | Income exclusions               | HUD Required                 | Income exclusions                                                                                                 |
| 06B-011                           | 6-II.C Asset Inclusions and Exclusions- Tax Refunds                                 | No previous guidance                                 | 6-II.C Asset Inclusions and Exclusions- Tax Refunds                                 | Added: PHAs are not required to verify the amount of the family's federal tax refund or refundable tax credits if the family's net assets are equal to or below the HUD-determined threshold (adjusted annually for inflation), even in years when full verification of assets is required or if the PHA does not accept self-certification of assets. PHAs must verify the amount of the family's federal tax refund or refundable tax credits if the family's net assets are greater than the HUD-determined threshold. The anticipated income earned by the assets in which a family has deposited their federal tax refund or refundable tax credits must be included in the family's annual income unless the income is specifically excluded.                                                                                                                                                                     | Internal Use Only            | Asset Inclusions and Exclusions | Fresno Housing Discretionary |                                                                                                                   |
| 06B-012                           | 6-III. D Health and Medical Care Expenses Deduction- Definition of Medical Expenses | No previous guidance                                 | 6-III. D Health and Medical Care Expenses Deduction- Definition of Medical Expenses | Added: Before placing health, medical, or disability expense bills and documentation in the tenant file, the PHA will redact all personally identifiable information. If the PHA receives documentation from a verification source that contains the individual's specific diagnosis, information regarding the individual's treatment, and/or information regarding the nature or severity of the person's disability, the PHA will immediately dispose of this confidential information; this information will never be maintained in the individual's file. If the information needs to be disposed of, the PHA will note in the individual's file that verification was received, the date received, and the name and address of the person/organization that provided the verification. Under no circumstances will the PHA include an applicant's or resident's medical records in the file [Notice PIH 2010-26]. | Regulatory Update            | Medical Documentations          | HUD Required                 | Current practice now outlined in the plan                                                                         |
| 06B-013                           | 6-III. E Disability Assistance Expense Deduction- Eligible Auxiliary Apparatus      | No previous guidance                                 | 6-III. E Disability Assistance Expense Deduction- Eligible Auxiliary Apparatus      | Added: PHA Policy Expenses incurred for maintaining or repairing an auxiliary apparatus are eligible. In the case of an apparatus that is specially adapted to accommodate a person with disabilities (e.g., a vehicle or computer), the cost to maintain the special adaptations (but not maintenance of the apparatus itself) is an eligible expense. The cost of service animals trained to give assistance to persons with disabilities, including the cost of acquiring the animal, veterinary care, food, grooming, and other continuing costs of care, will be included.                                                                                                                                                                                                                                                                                                                                         | Regulatory Update            | Disability Expenses             | HUD Required                 | Detailed explanation of specific items.                                                                           |
| 06B-014                           | 6-III.G Harship Exemptions- Phased In Relief                                        | Policy on Hardship Exemptions and how to apply them  | 6-III.G Harship Exemptions- Phased In Relief                                        | Added clarifications on phased-in relief for hardship exemptions based on answers received from HOTMAquestions@HUD.GOV                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Regulatory Update            | Hardship exemptions             | HUD Required                 | Hardship clarification                                                                                            |
| 06B-015                           | 6-III.G Harship Exemptions- General Relief                                          | Policy on Hardship Exemptions and how to apply them  | 6-III.G Harship Exemptions- General Relief                                          | Added clarifications on general relief for hardship exemptions based on answers received from HOTMAquestions@HUD.GOV                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Regulatory Update            | Hardship exemptions             | HUD Required                 | Hardship clarification                                                                                            |
| CHAPTER 07 B -HOTMA VERIFICATIONS |                                                                                     |                                                      |                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                              |                                 |                              |                                                                                                                   |
| 07B-001                           | Chapter 7 A                                                                         | Pre HOTMA                                            | Chapter 7 B                                                                         | Chapter 7B will now be known as Chapter 7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | HOTMA Applicability          | HOTMA Applicability             | HUD Required                 | Clarifies applicability of Chapters 7A and 7B.                                                                    |
| 07B-002                           | Chapter Introduction                                                                | HOTMA chapter introduced upon implementation.        | Chapter Introduction                                                                | Removed language calling out policy that will apply upon the HOTMA compliance date                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Regulatory Update            | Administrative Clarification    | HUD Required                 | Clarifies applicability of Chapters 7A and 7B.                                                                    |
| 07B-003                           | 7-I.A. Family Consent to Release of Information                                     | HUD-9886-A consent requirements addressed generally. | 7-I.A. Family Consent to Release of Information                                     | Adds PHA policy requiring adult household members to authorize sharing of EIV information with the head of household. If consent is not provided, the PHA will issue separate EIV reports to each adult household member. Refusal to share EIV information is not grounds for denial or termination of assistance.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Policy Revision              | EIV Consent Procedures          | Fresno Housing Discretionary | Establishes local procedures for protecting adult household member privacy while complying with EIV requirements. |

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| 07B-004                                    | 7-I.A. Family Consent to Release of Information-Form HUD 9886 A                                   | HUD-9886-A consent requirements addressed generally.                                                                         | 7-I.A. Family Consent to Release of Information-Form HUD 9886 A                                   | updated to align with Model Plan                                                                                                                                                                                                                                          | Administrative Clarification | Consent Forms                        | HUD Required                 | Aligns with HOTMA implementation guidance.                                      |
| 07B-005                                    | 7-I.A. Form HUD-9886-A                                                                            | Family members turning 18 signed consent forms during reexamination.                                                         | 7-I.A. Form HUD-9886-A                                                                            | Clarifies that household members who turn 18 between annual recertifications must execute Form HUD-9886-A at the next interim or annual reexamination, whichever occurs first.                                                                                            | Administrative Clarification | Consent Forms                        | HUD Required                 | Aligns with HOTMA implementation guidance.                                      |
| 07B-006                                    | 7-I.A. Revocation of Financial Records Consent                                                    | Revocation consequences addressed generally.                                                                                 | 7-I.A. Family Consent to Release of Information                                                   | Establishes local policy that revocation of consent to access financial institution records will result in denial of admission or termination of assistance after written notice and notification to HUD.                                                                 | Policy Revision              | Financial Records Consent            | Fresno Housing Discretionary | Exercise of PHA discretion permitted under HOTMA.                               |
| 07B-007                                    | 7-I.B. Safe Harbor Income Determinations                                                          | PHA discretion regarding use of Safe Harbor determinations.                                                                  | 7-I.B. Use of Other Programs' Income Determinations                                               | Establishes PHA policy not to accept income determinations from other federal means-tested assistance programs and instead continue verifying income using HUD's verification hierarchy.                                                                                  | Policy Revision              | Safe Harbor Income Verification      | Fresno Housing Discretionary | Local policy decision declining optional Safe Harbor verification.              |
| 07B-008                                    | 7-I.C. Streamlined Income Determinations                                                          | HUD permits streamlined verification for fixed-income sources.                                                               | 7-I.C. Streamlined Income Determinations                                                          | Establishes PHA policy not to use HUD's optional fixed-income streamlining and instead obtain third-party verification of income annually.                                                                                                                                | Policy Revision              | Fixed Income Verification            | Fresno Housing Discretionary | Local decision to continue full annual verification.                            |
| 07B-009                                    | 7-I.E.–7-I.F. EIV Verification                                                                    | General EIV verification requirements.                                                                                       | 7-I.E.–7-I.F. EIV Verification                                                                    | Updates EIV procedures to reflect HOTMA requirements, including 120-day EIV report timeliness, New Hires Report review, quarterly No Income Reported review, monthly Identity Verification review, and revised use of EIV plus self-certification.                        | Regulatory Update            | Enterprise Income Verification (EIV) | HUD Required                 | Consolidates multiple HUD-required EIV operational changes.                     |
| 07B-010                                    | 7-I.E.Level 5 and 6 Verifications: Up Front Income Verification (UIV)                             | Description of UIV                                                                                                           | 7-I.E.–Level 5 and 6 Verifications: Up Front Income Verification (UIV)- Deceased Tenant's Report  | Changes to policy regarding Deceased Tenants Report per Notice PIH 2026-11                                                                                                                                                                                                | Regulatory Update            | Enterprise Income Verification (EIV) | HUD Required                 | Policy update                                                                   |
| 07B-011                                    | 7-III.L Student Financial Assistance                                                              | Policy regarding Student Financial Assistance                                                                                | 7-III.L Student Financial Assistance                                                              | Minor clarifications regarding student financial assistance                                                                                                                                                                                                               | Regulatory Update            | HOTMA Compliance                     | HUD Required                 | Student Financial Assistance                                                    |
| CHAPTER 08 -NSPIRE AND RENT REASONABLENESS |                                                                                                   |                                                                                                                              |                                                                                                   |                                                                                                                                                                                                                                                                           |                              |                                      |                              |                                                                                 |
| 08-001                                     | Chapter Introduction                                                                              | NSPIRE implementation required by October 1, 2025.                                                                           | Chapter Introduction                                                                              | Updates mandatory NSPIRE implementation date to February 1, 2027 (reflecting HUD's revised implementation deadline) and references Notice PIH 2024-26 REV-1.                                                                                                              | Regulatory Update            | NSPIRE Implementation                | HUD Required                 | Updates HUD implementation schedule.                                            |
| 08-002                                     | 8-I.B. Affirmative Habitability Requirements                                                      | Smoke alarm battery requirements referenced future compliance date.                                                          | 8-I.B. Affirmative Habitability Requirements                                                      | Updates smoke alarm requirements to reflect the Public and Federally Assisted Housing Fire Safety Act, requiring sealed 10-year batteries or hardwired smoke alarms.                                                                                                      | Regulatory Update            | Fire Safety Requirements             | HUD Required                 | Implements federal fire safety requirements.                                    |
| 08-003                                     | 8-I.E. Life-Threatening Deficiencies                                                              | HUD list of life-threatening deficiencies.                                                                                   | 8-I.E. Life-Threatening Deficiencies                                                              | Retains HUD standards and continues Fresno Housing policy identifying utilities not in service, including no running hot water, as an additional life-threatening deficiency.                                                                                             | Administrative Clarification | Local NSPIRE Standards               | Fresno Housing Discretionary | Confirms continuation of existing local standard.                               |
| 08-004                                     | 8-I.F. Owner and Family Responsibilities                                                          | Pre-June 6, 2024 HQS owner/family responsibility provisions.                                                                 | 8-I.F. Owner and Family Responsibilities                                                          | Revises owner and family responsibility provisions for HAP contracts executed or renewed on or after June 6, 2024, including PHA authority to waive owner responsibility for tenant-caused deficiencies and establish correction timeframes for family-caused violations. | Regulatory Update            | Owner & Family Responsibilities      | HUD Required                 | Implements revised HQS/NSPIRE regulations.                                      |
| 08-005                                     | 8-III.B When Rent Reasonableness Determinations are Required- Owner Initiated Rent Determinations | Rent Adjustment policy                                                                                                       | 8-III.B When Rent Reasonableness Determinations are Required- Owner Initiated Rent Determinations | Removal of incorrect language on rent increases. "Rent increases will not be approved unless any failed items identified by the most recent inspection have been corrected."                                                                                              | Regulatory Update            | Rent Adjustment policy               | HUD Required                 | Corrective action                                                               |
| CHAPTER 09 -LEASING                        |                                                                                                   |                                                                                                                              |                                                                                                   |                                                                                                                                                                                                                                                                           |                              |                                      |                              |                                                                                 |
| 9-001                                      | 9-I.B. Requesting Tenancy Approval                                                                | Administrative Plan did not specify whether multiple Requests for Tenancy Approval (RTAs) could be submitted simultaneously. | 9-I.B. Requesting Tenancy Approval                                                                | Establishes PHA policy that families may submit only one Request for Tenancy Approval at a time and outlines procedures for reviewing incomplete RTAs, leases, and discrepancies.                                                                                         | Policy Revision              | Request for Tenancy Approval         | Fresno Housing Discretionary | Implements HUD requirement that PHAs establish a local policy on multiple RTAs. |
| 09-002                                     | 9-I.E. PHA Leasing Assistance for Families                                                        | No local policy regarding use of administrative fee reserves for leasing assistance.                                         | 9-I.E. PHA Leasing Assistance for Families                                                        | Establishes PHA policy not to use unrestricted net position (UNP) or ongoing administrative fees for security deposits, utility deposits, application fees, or holding fees.                                                                                              | Policy Revision              | Leasing Assistance                   | Fresno Housing Discretionary | Local policy declining optional leasing assistance authorized by HUD.           |

| CHAPTER 10 - MOVING WITH CONTINUED ASSISTANCE |                                                      |                                                                                                                                               |                                                                    |                                                                                                                                                                                                                                                                                                                    |                     |                                      |                              |                                                                                            |  |
|-----------------------------------------------|------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------|--------------------------------------|------------------------------|--------------------------------------------------------------------------------------------|--|
| 0-001                                         | 10-I.A. Allowable Moves – VAWA Moves                 | Families could move when necessary to protect a victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking. | 10-I.A. Allowable Moves – VAWA Emergency Transfers                 | Expands emergency-transfer procedures, including use of Form HUD-5383, documentation or waiver of documentation, external transfers, continued-assistance eligibility, and possible issuance of a voucher to the victim before terminating the perpetrator’s assistance.                                           | Regulatory Update   | VAWA Emergency Transfers             | HUD Required                 | Connects the moving policy to the PHA Emergency Transfer Plan in Chapter 16.               |  |
| 10-002                                        | No Previous Section                                  | Families affected by an owner’s failure to correct inspection deficiencies were addressed through general move and inspection policies.       | 10-I.B. Family Moves Due to Unit Deficiencies – Units in Abatement | Adds a specific right for families to terminate tenancy and receive a voucher while HAP is withheld or abated for uncorrected housing quality deficiencies. A briefing is required before issuance.                                                                                                                | New Section         | Moves During HAP Abatement           | HUD Required                 | Implements revised requirements for families living in units with unresolved deficiencies. |  |
| 10-003                                        | No Previous Section                                  | No detailed policy established the voucher timing and search period when a HAP contract was terminated for an owner’s failure to repair.      | 10-I.B. Termination of HAP Contract and Family Moves               | Requires the PHA to issue the family a voucher at least 30 days before HAP contract termination. Fresno Housing establishes a 120-calendar-day initial voucher term and requires a briefing.                                                                                                                       | New Section         | Owner Repair Failure Relocation      | HUD Required                 | The 120-day voucher term is a local policy choice within the HUD framework.                |  |
| 10-004                                        | No Previous Section                                  | No public housing preference was stated for families unable to lease after owner repair-related HAP termination.                              | 10-I.B. Offer of Public Housing                                    | Establishes a public housing preference for HCV families whose HAP contract is terminated because the owner failed to make repairs and who cannot lease another unit during the voucher term.                                                                                                                      | New Section         | Public Housing Preference            | HUD Required                 | The family will receive written notice approximately 30 days before voucher expiration.    |  |
| 10-005                                        | No Previous Section                                  | No policy authorized use of withheld or abated HAP for relocation expenses.                                                                   | 10-I.B. Relocation Assistance                                      | Allows Fresno Housing to use up to two months of withheld or abated HAP for qualifying relocation costs, including security deposits or other reasonable moving expenses. Families must be in program compliance and provide documentation regarding the prior security deposit and tenant-caused damages or debt. | New Policy          | Relocation Financial Assistance      | Fresno Housing Discretionary | HUD permits but does not require this assistance.                                          |  |
| 10-006                                        | 10-I.C. Restrictions on Moves                        | The PHA restricted elective moves during the initial lease term and generally limited families to one elective move in a 12-month period.     | 10-I.C. Restrictions on Moves                                      | Retains the move restrictions but adds or clarifies exceptions for health and safety, lead hazards, VAWA, witness protection, employment or school changes, emergencies, and reasonable accommodations. Supervisor approval is required for discretionary exceptions.                                              | Policy Revision     | Elective Move Exceptions             | Fresno Housing Discretionary | Clarifies when the local move restrictions may be waived.                                  |  |
| 10-007                                        | 10-I.D. Moving Process – Reexamination               | A new reexamination could be conducted when a family moved.                                                                                   | 10-I.D. Moving Process – Reexamination                             | Establishes that a new annual reexamination will be completed for an in-jurisdiction move only when the reexamination is due within 120 days.                                                                                                                                                                      | Policy Revision     | Move Reexamination Timing            | Fresno Housing Discretionary | Reduces unnecessary full annual reexaminations during moves.                               |  |
| 10-008                                        | 10-II.B. Initial PHA Role – Applicant Families       | Nonresident applicant families generally had to lease within the initial PHA’s jurisdiction for 12 months before portability.                 | 10-II.B. Initial PHA Role – Applicant Families                     | Retains the 12-month residency requirement and expressly adds exceptions for reasonable accommodation and reasons related to domestic violence, dating violence, sexual assault, stalking, or human trafficking.                                                                                                   | Regulatory Update   | Initial Portability Exceptions       | HUD Required                 | Aligns portability restrictions with disability and VAWA protections.                      |  |
| CHAPTER 11 B- REEXAMINATIONS                  |                                                      |                                                                                                                                               |                                                                    |                                                                                                                                                                                                                                                                                                                    |                     |                                      |                              |                                                                                            |  |
| 011B-001                                      | Chapter 11 A                                         | Pre HOTMA                                                                                                                                     | Chapter 11 B                                                       | Chapter 11 B will now be known as Chapter 11                                                                                                                                                                                                                                                                       | HOTMA Applicability | HOTMA Applicability                  | HUD Required                 | Clarifies applicability of Chapters 11A and 11B.                                           |  |
| 11B-001                                       | 11-I.A. Annual Reexaminations                        | Annual income was generally determined by anticipating income for the upcoming 12-month period.                                               | 11-I.A. Annual Reexaminations                                      | Requires annual income to be based first on the family’s income during the previous 12 months, adjusted for current changes. Income from assets continues to be anticipated.                                                                                                                                       | Regulatory Update   | Prior-Year Income Method             | HUD Required                 | Implements HOTMA annual income methodology.                                                |  |
| 11B-002                                       | 11-I.B. Scheduling Annual Reexaminations             | Annual reexaminations were initiated through established PHA procedures.                                                                      | 11-I.B. Scheduling Annual Reexaminations                           | Establishes online initiation through Rent Café, notice by mail and email, multiple document-submission methods, and in-person assistance or interviews when needed for accommodation, LEP, incomplete paperwork, or family assistance.                                                                            | Policy Revision     | Annual Reexamination Process         | Fresno Housing Discretionary | Documents Fresno Housing’s electronic and assisted-processing procedures.                  |  |
| 11B-003                                       | 11-I.C. Conducting Annual Reexaminations             | Families were required to provide requested reexamination documentation.                                                                      | 11-I.C. Conducting Annual Reexaminations                           | Establishes a 10-calendar-day period to provide missing documents after written notification or an interview, subject to an approved extension. Failure to comply may result in termination.                                                                                                                       | Policy Revision     | Missing Reexamination Documents      | Fresno Housing Discretionary | Creates a clear compliance timeframe.                                                      |  |
| 11B-004                                       | 11-I.E. Calculating Annual Income                    | Income was calculated using anticipated income and existing verification procedures.                                                          | 11-I.E. Calculating Annual Income at Annual Reexamination          | Adds the HOTMA three-step calculation process using the EIV Income Report, the most recent HUD-50058, family-reported prior-year income, interim changes, and current income when changes occurred.                                                                                                                | Regulatory Update   | HOTMA Annual Income Calculation      | HUD Required                 | Fresno Housing will not use optional streamlined income determinations.                    |  |
| 11B-005                                       | 11-I.F. Annual Reexamination Effective Dates         | Annual increases and decreases were generally effective on the anniversary date.                                                              | 11-I.F. Effective Dates                                            | Clarifies effective dates for increases and decreases, including 30-day notice requirements, retroactive increases when a family causes delay, prospective decreases when family delay occurs, and interim processing of decreases discovered during annual reexamination.                                         | Policy Revision     | Annual Reexamination Effective Dates | Fresno Housing Discretionary | Provides detailed operational rules for delayed or early reexaminations.                   |  |
| 11B-006                                       | 11-II.B. Changes in Family and Household Composition | Families were required to report household composition changes promptly.                                                                      | 11-II.B. Changes in Family and Household Composition               | Establishes a 30-calendar-day reporting requirement for all family and household composition changes.                                                                                                                                                                                                              | Policy Revision     | Composition Reporting Timeframe      | Fresno Housing Discretionary | Creates a defined local reporting deadline.                                                |  |
| 11B-007                                       | 11-II.B. Adding Family or Household Members          | PHA approval was required for most new members other than birth, adoption, or court-awarded custody.                                          | 11-II.B. New Family and Household Members Requiring Approval       | Expands approval procedures for family members, live-in aides, foster children, and foster adults; requires written approval before occupancy; applies eligibility and documentation standards; and establishes a 10-calendar-day decision period after receipt of all required information.                       | Policy Revision     | Household Member Approval            | Fresno Housing Discretionary | Also addresses overcrowding and separate-bedroom requirements for foster placements.       |  |

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| 11B-008                                                  | 11-II.B. Changes in Family Unit Size                            | A changed voucher size generally affected the payment standard at the next regular reexamination.                 | 11-II.B. Changes in Family Unit Size                            | Applies the new voucher size and related payment standard on the effective date of the interim reexamination implementing the family-size change.                                                                                                                                  | Policy Revision     | Immediate Voucher Size Adjustment | Fresno Housing Discretionary | HUD now permits immediate application or application at the next annual reexamination. Fresno Housing selected immediate implementation. |
| 11B-009                                                  | 11-II.C. Interim Decreases                                      | Interim decreases were processed under pre-HOTMA policies.                                                        | 11-II.C. Interim Decreases                                      | Implements the HOTMA percentage-based interim standard and requires interim processing for any decrease connected to the death or permanent departure of a family member.                                                                                                          | Regulatory Update   | Interim Income Decreases          | HUD Required                 | HUD generally permits a 10 percent threshold but requires processing in specified family-composition cases.                              |
| 11B-010                                                  | 11-II.C. Interim Decreases                                      | Interim decreases were processed under pre-HOTMA policies.                                                        | 11-II.C. Interim Decreases                                      | Updated changes regarding conducting interim reexaminations per Notice 2023-27 rev 3                                                                                                                                                                                               | Regulatory Update   | Interim Income Decreases          | HUD Required                 | HUD generally permits a 10 percent threshold but requires processing in specified family-composition cases.                              |
| 11B-011                                                  | 11-II.C. Family Reporting of Income Changes                     | Families reported income changes under existing interim-reporting requirements.                                   | 11-II.C. Family Reporting                                       | Requires families to report all income changes, regardless of amount, source, or timing during the certification period. Fresno Housing then determines whether the change requires an interim reexamination.                                                                      | Policy Revision     | Income Change Reporting           | Fresno Housing Discretionary | More restrictive than requiring families to report only changes expected to meet the interim threshold.                                  |
| 11B-012                                                  | No Previous Part                                                | Transactions not affecting adjusted income were not organized as a separate category.                             | Part III. Non-Interim Reexamination Transactions                | Adds a separate category for household or record changes that do not change adjusted income and do not require an interim reexamination.                                                                                                                                           | New Section         | Non-Interim Transactions          | HUD Required                 | Separates administrative household changes from income-based interim reexaminations.                                                     |
| 11B-013                                                  | Recalculating Family Share and Subsidy                          | Payment standards, subsidy standards, and utility allowances were updated during reexamination under prior rules. | Recalculating Family Share and Subsidy Amount                   | Updates the application of payment standards and voucher size under the HOTMA Voucher Final Rule and retains use of revised utility allowances at the first annual reexamination after adoption.                                                                                   | Regulatory Update   | Subsidy Recalculation             | HUD Required                 |                                                                                                                                          |
| <b>CHAPTER 12- TERMINATION OF ASSISTANCE AND TENANCY</b> |                                                                 |                                                                                                                   |                                                                 |                                                                                                                                                                                                                                                                                    |                     |                                   |                              |                                                                                                                                          |
| 12-001                                                   | 12-I.C. Family Chooses to Terminate Assistance                  | Families could request voluntary termination of assistance.                                                       | 12-I.C. Family Chooses to Terminate Assistance                  | Clarifies that a voluntary termination request may be made verbally, although written requests are preferred. Verbal requests must be fully documented by the PHA.                                                                                                                 | Clarification       | Voluntary Termination Requests    | Administrative Cleanup       | Clarifies acceptable request methods without changing the family's right to withdraw.                                                    |
| 12-002                                                   | 12-I.D. Mandatory Termination – Lease Violations                | Serious or repeated lease violations were grounds for termination, including nonpayment of rent.                  | 12-I.D. Mandatory Termination – Lease Violations                | Adds a specific statement that nonpayment of the tenant rent share is a serious or repeated lease violation and a violation of family obligations for which the PHA may terminate assistance.                                                                                      | Policy Revision     | Nonpayment of Tenant Rent         | Fresno Housing Discretionary | Makes the enforcement standard more explicit.                                                                                            |
| 12-003                                                   | 12-I.D. Mandatory Termination – Failure to Provide Consent      | Failure to sign required consent forms resulted in termination.                                                   | 12-I.D. Mandatory Termination – Failure to Provide Consent      | Adds termination when the family revokes consent allowing the PHA to obtain financial institution records.                                                                                                                                                                         | Policy Revision     | Financial Records Consent         | Fresno Housing Discretionary | Coordinates with the local policy adopted in Chapter 7B.                                                                                 |
| 12-004                                                   | 12-I.D. Mandatory Termination – Death of the Sole Family Member | Policy on deceased single-member households                                                                       | 12-I.D. Mandatory Termination – Death of the Sole Family Member | revisions made regarding death of a sole family memberand family absence from the unit per Notice PIH 2026-11                                                                                                                                                                      | Policy Revision     | Death of a sole member            | HUD Required                 | EOP dates                                                                                                                                |
| 12-005                                                   | 12-I.E. Other Authorized Reasons for Termination                | Violent or abusive behavior toward PHA personnel was grounds for termination.                                     | 12-I.E. Other Authorized Reasons for Termination                | Expands the definition to include repeated, excessive, or disruptive communications; threatening, intimidating, or coercive language; and conduct creating a hostile, intimidating, or unsafe work environment.                                                                    | Policy Revision     | Abusive Conduct Toward Staff      | Fresno Housing Discretionary | Adds harassment and disruptive communications to the local definition of abusive behavior.                                               |
| 12-006                                                   | 12-I.E. Other Authorized Reasons for Termination                | Upon the PHA's HOTMA 102/104 compliance date, the below section on the asset limitation is added:                 | 12-I.E. Other Authorized Reasons for Termination                | Removed language calling out policy that will apply upon the HOTMA compliance date                                                                                                                                                                                                 | HOTMA Applicability | HOTMA Applicability               | HUD Required                 | HOTMA transition requirement.                                                                                                            |
| 12-007                                                   | No Previous HOTMA Policy                                        | Continued eligibility was not subject to the HOTMA asset limitation.                                              | 12-I.E. Asset Limitation                                        | Adopts total nonenforcement of the HOTMA asset limitation for current participants. The asset limitation applies only at initial eligibility for new admissions.                                                                                                                   | New Policy          | HOTMA Asset Limitation            | Fresno Housing Discretionary | This is a significant local policy choice permitted under HOTMA.                                                                         |
| 12-008                                                   | 12-I.E. Insufficient Funding                                    | The PHA could terminate HAP contracts when funding was insufficient.                                              | 12-I.E. Insufficient Funding                                    | Adds detailed contract-termination priorities after all reasonable cost-saving measures are exhausted. Families assisted the longest are generally terminated first, excluding elderly and disabled families, while required special-purpose voucher families are terminated last. | Policy Revision     | Funding Shortfall Priorities      | Fresno Housing Discretionary | HUD requires the Administrative Plan to state the factors used to decide which HAP contracts would be terminated first.                  |
| 12-009                                                   | Exhibit 12-1. Family Obligations – Household Composition        | Families had to request approval before adding most family members or household members.                          | Exhibit 12-1. Family Obligations – Household Composition        | Adds cross-references to the detailed foster child, foster adult, and live-in aide approval and denial policies in Chapters 3 and 11.                                                                                                                                              | Clarification       | Approved Household Members        | Administrative Cleanup       | Aligns the family obligations with newly expanded occupancy policies.                                                                    |
| 12-010                                                   | Exhibit 12-1. Family Obligations – Unit Address                 | The unit had to be the family's sole residence and unauthorized occupants were prohibited.                        | Exhibit 12-1. Family Obligations – Unit Address                 | Adds that persons who are not Fresno Housing-approved household members may not use the assisted unit's address for any purpose, including mail. Such use may be treated as evidence of an unauthorized resident.                                                                  | New Policy          | Unauthorized Address Use          | Fresno Housing Discretionary | Establishes an additional indicator for investigating unauthorized occupancy.                                                            |
| <b>CHAPTER 13- TERMINATION OF ASSISTANCE AND TENANCY</b> |                                                                 |                                                                                                                   |                                                                 |                                                                                                                                                                                                                                                                                    |                     |                                   |                              |                                                                                                                                          |
| 13-001                                                   | 13-I.A. Owner Recruitment and Retention                         | Owner recruitment and outreach were addressed generally.                                                          | 13-I.A. Owner Recruitment and Retention                         | Expands owner outreach methods to include printed materials, telephone and in-person contacts, annual recruitment or information meetings, industry partnerships, and participation in events hosted by other agencies. Outreach will be reviewed for effectiveness.               | Policy Revision     | Owner Recruitment and Outreach    | Fresno Housing Discretionary | Documents the methods Fresno Housing may use to attract owners, including owners outside areas of poverty or minority concentration.     |

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| 13-002                            | 13-I.A. Owner Retention                                       | Owner services and retention efforts were addressed generally.                                                         | 13-I.A. Owner Retention                                     | Adds specific retention strategies, including designated contacts, inspection and leasing coordination, owner resource materials, landlord handbooks, and email or text communications.                                                     | Policy Revision   | Owner Retention Services                  | Fresno Housing Discretionary | Establishes additional customer-service methods to support participating owners.          |
| 13-003                            | No Previous Policy                                            | The plan did not clearly state whether Fresno Housing would use administrative fees for owner incentives.              | 13-I.A. Owner Incentive/Retention Payments                  | Establishes that Fresno Housing will not provide owner incentive payments or retention payments.                                                                                                                                            | New Policy        | Owner Incentive Payments                  | Fresno Housing Discretionary | HUD permits, but does not require, use of administrative fees or UNP for these payments.  |
| 13-004                            | 13-I.B. Basic HCV Program Requirements                        | Families received information regarding owners who may be willing to participate.                                      | 13-I.B. Basic HCV Program Requirements                      | Directs owners to register available units through AffordableHousing.com and includes the website as a housing-search resource in the family's briefing packet.                                                                             | Policy Revision   | Owner Unit Listings                       | Fresno Housing Discretionary | Documents Fresno Housing's current unit-listing process.                                  |
| 13-005                            | 13-I.C. Owner Responsibilities                                | Owners were responsible for maintaining units under housing quality standards and complying with program requirements. | 13-I.C. Owner Responsibilities                              | Updates owner obligations to reflect revised housing-quality enforcement standards, including written notice of deficiencies and correction within required timeframes.                                                                     | Regulatory Update | Owner Inspection Responsibilities         | HUD Required                 | Coordinates owner responsibilities with Chapter 8's updated inspection policies.          |
| 13-006                            | 13-II.B. HAP Contract Contents                                | The plan did not expressly state whether HAP was considered received upon mailing or actual receipt.                   | 13-II.B. HAP Contract Contents                              | Establishes that Fresno Housing will not add language defining when HAP is considered received by the owner. No modification will be made to Part A of the HAP contract.                                                                    | New Policy        | Receipt of HAP Payment                    | Fresno Housing Discretionary | Declines an optional HAP contract provision.                                              |
| CHAPTER 14- PROGRAM INTEGRITY     |                                                               |                                                                                                                        |                                                             |                                                                                                                                                                                                                                             |                   |                                           |                              |                                                                                           |
| 14-001                            | 14-I.B. Independent Audits and HUD Monitoring                 | An independent audit was required when a PHA expended at least \$750,000 in federal awards annually.                   | 14-I.B. Independent Audits and HUD Monitoring               | Updates the federal-award expenditure threshold for an independent audit from \$750,000 to \$1,000,000.                                                                                                                                     | Regulatory Update | Federal Audit Threshold                   | HUD Required                 | Updates the audit threshold under federal requirements.                                   |
| 14-002                            | 14-I.C. Investigation Findings and Notices                    | Investigation results and remedies were communicated to affected parties.                                              | 14-I.C. Notice and Appeals                                  | Establishes that Fresno Housing will issue written findings and remedies within 10 business days after completing an investigation. The notice will state the violation, basis, remedy, and applicable appeal rights.                       | Policy Revision   | Program Integrity Investigation Notice    | Fresno Housing Discretionary | Creates a clear notice timeframe and required notice contents.                            |
| 14-003                            | 14-II.A. Subsidy Underpayments and Overpayments               | Incorrect HAP, family share, or utility reimbursements were corrected prospectively.                                   | 14-II.A. Subsidy Underpayments and Overpayments             | Clarifies that family-share increases take effect after a written 30-day notice and decreases take effect the first of the month after discovery of the error.                                                                              | Policy Revision   | Correction of Subsidy Errors              | Fresno Housing Discretionary | Establishes effective dates for correcting errors.                                        |
| 14-004                            | 14-II.D. PHA-Caused Errors                                    | Fresno Housing corrected staff-caused errors under general repayment and reimbursement rules.                          | 14-II.D. De Minimis Errors                                  | Adds HOTMA's de minimis error standard of no more than \$30 in monthly adjusted income or \$360 annually. Fresno Housing will repay or credit a family for any rent overpayment, including a de minimis error.                              | Regulatory Update | HOTMA De Minimis Errors                   | HUD Required                 | Families are not required to repay amounts resulting from PHA undercalculation of income. |
| CHAPTER 15- SPECIAL HOUSING TYPES |                                                               |                                                                                                                        |                                                             |                                                                                                                                                                                                                                             |                   |                                           |                              |                                                                                           |
| 15-001                            | Chapter Introduction                                          | Fresno Housing allowed identified special housing types under its existing local policy.                               | Chapter Introduction                                        | Clarifies that families may use all listed special housing types, while cooperative housing is permitted only when needed as a reasonable accommodation.                                                                                    | Policy Revision   | Permitted Special Housing Types           | Fresno Housing Discretionary | Establishes the scope of special housing types available locally.                         |
| 15-002                            | Parts I–VI. Housing Quality Standards                         | Special housing types were inspected using existing HQS requirements.                                                  | Parts I–VI. Housing Quality Standards                       | Updates inspection references and standards for special housing types to align with the applicable Chapter 8 housing-quality and NSPIRE framework.                                                                                          | Regulatory Update | Special Housing Type Inspections          | HUD Required                 | Applies updated housing quality terminology and procedures.                               |
| 15-003                            | Part V. Cooperative Housing                                   | Cooperative housing was addressed as an eligible special housing type.                                                 | Part V. Cooperative Housing – Reasonable Accommodation Only | Limits cooperative housing assistance to situations in which it is required as a reasonable accommodation for a person with a disability.                                                                                                   | Policy Revision   | Cooperative Housing                       | Fresno Housing Discretionary | Other forms of cooperative assistance are not offered under the general HCV program.      |
| CHAPTER 16-PROGRAM ADMINISTRATION |                                                               |                                                                                                                        |                                                             |                                                                                                                                                                                                                                             |                   |                                           |                              |                                                                                           |
| 16-001                            | 16-I. Administrative Fee Reserve                              | Administrative fee reserves were used for eligible HCV administrative expenses subject to Board oversight.             | 16-I. Administrative Fee Reserve                            | Retains the requirement that expenditures exceeding \$10,000 per occurrence receive prior Board approval and adds updated HUD guidance regarding permissible leasing and owner-participation activities.                                    | Regulatory Update | Administrative Fee Reserve                | HUD Required                 | Local Board approval threshold remains unchanged.                                         |
| 16-002                            | 16-II.B. Payment Standards                                    | Payment standards were generally based on metropolitan FMRs and existing exception-payment-standard policies.          | 16-II.B. Payment Standards                                  | Expands payment-standard requirements to address SAFMRs, designated payment-standard areas, exception payment standards, and revised HUD criteria under Notice PIH 2024-34.                                                                 | Regulatory Update | Payment Standard Framework                | HUD Required                 | Incorporates the updated federal payment-standard structure.                              |
| 16-003                            | 16-II.B. Small Area Fair Market Rents                         | Fresno Housing had not voluntarily adopted SAFMRs as its general payment-standard system.                              | 16-II.B. Small Area FMR PHAs                                | Confirms Fresno Housing is not a mandatory SAFMR PHA and will not voluntarily adopt SAFMRs for all units. SAFMRs may be used to establish exception payment standards in qualifying ZIP codes.                                              | Policy Revision   | SAFMR Adoption                            | Fresno Housing Discretionary | Declines full SAFMR adoption while retaining use for targeted exception standards.        |
| 16-004                            | 16-II.B. Designated Payment Standard Areas                    | No separate designated payment-standard areas were established.                                                        | 16-II.B. Designated Payment Standard Areas                  | Confirms Fresno Housing has not established designated payment-standard areas within its jurisdiction.                                                                                                                                      | New Policy        | Designated Payment Standard Areas         | Fresno Housing Discretionary | HUD now requires the Administrative Plan to state whether these areas are used.           |
| 16-005                            | 16-II.B. Exception Payment Standards                          | Exception payment standards were considered under prior HUD standards.                                                 | 16-II.B. Exception Payment Standards                        | Establishes that Fresno Housing may use SAFMR-based exception payment standards for ZIP codes where the SAFMR exceeds the metropolitan FMR, generally within 90–110 percent of the SAFMR.                                                   | Policy Revision   | SAFMR Exception Payment Standards         | Fresno Housing Discretionary | If the SAFMR does not exceed the FMR, the regular FMR will be used.                       |
| 16-006                            | 16-II.B. Reasonable Accommodation Exception Payment Standards | Exception payment standards could be approved as reasonable accommodations under existing HUD limits.                  | 16-II.B. Reasonable Accommodation                           | Expands examples of disability-related needs and updates approval limits: generally up to 120 percent of the FMR or SAFMR without HUD approval, up to 140 percent for VASH reasonable accommodations, and higher amounts with HUD approval. | Regulatory Update | Reasonable Accommodation Payment Standard | HUD Required                 | Incorporates Notice PIH 2025-12 and updated HUD authority.                                |

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| 16-007                                | 16-VII. Elevated Blood Lead Level Reporting          | The PHA followed existing lead reporting, data collection, and record-retention requirements.             | 16-VII. Elevated Blood Lead Level Reporting          | Establishes written notification to the public health department, HUD field office, and HUD's lead-hazard office within five business days after notice of a child with an elevated blood lead level.                                               | Regulatory Update | Lead Hazard Reporting            | HUD Required                 | Also retains quarterly address reporting to the local public health department.                                             |
| 16-008                                | 16-VIII. Determination of Insufficient Funding       | Funding sufficiency was determined using projected annual HAP costs and available funding.                | 16-VIII. Determination of Insufficient Funding       | Expands the methodology to address voucher issuance, higher-cost moves, portability, continued assistance, and required HAP-contract termination factors identified in Chapter 12.                                                                  | Regulatory Update | Insufficient Funding Methodology | HUD Required                 |                                                                                                                             |
| CHAPTER 17-PROJECT BASED VOUCHERS     |                                                      |                                                                                                           |                                                      |                                                                                                                                                                                                                                                     |                   |                                  |                              |                                                                                                                             |
| 17-001                                | 17-I.A.–17-I.B. General Requirements and Definitions | PBV policies used the prior Part 983 definitions and regulatory framework.                                | 17-I.A.–17-I.B. General Requirements and Definitions | Updates PBV definitions and requirements, including existing, newly constructed, rehabilitated, PHA-owned, legacy non-RAD PBV, excluded, and excepted units.                                                                                        | Regulatory Update | PBV Definitions                  | HUD Required                 | Implements revised 24 CFR Part 983.                                                                                         |
| 17-002                                | 17-I.B. Definition of Project                        | A project was defined under prior federal standards.                                                      | 17-I.B. PBV Definitions                              | Confirms Fresno Housing will not adopt a narrower local definition limiting a project to a single building or particular grouping of buildings.                                                                                                     | New Policy        | PBV Project Definition           | Fresno Housing Discretionary | Uses the full federal definition of project.                                                                                |
| 17-003                                | 17-I.C. Maximum Number of PBV Units                  | PBV assistance was subject to the former program and project-cap requirements.                            | 17-I.C. Maximum Number of PBV Units                  | Updates the 20 percent program cap, additional 10 percent authority, excluded units, increased-cap units, and project-cap exceptions.                                                                                                               | Regulatory Update | PBV Program and Project Caps     | HUD Required                 | Incorporates revised HOTMA PBV cap requirements.                                                                            |
| 17-004                                | Part II. PBV Owner Proposals and Project Selection   | PBV proposals, project selection, subsidy layering, and site selection followed the prior PBV rule.       | Part II. PBV Owner Proposals and Project Selection   | Revises competitive and noncompetitive selection methods, project eligibility, subsidy layering, environmental review, site selection, and selection of PHA-owned projects.                                                                         | Regulatory Update | PBV Project Selection            | HUD Required                 | Consolidates multiple related Part 983 updates.                                                                             |
| 17-005                                | Part III. Dwelling Units and Inspections             | PBV units were inspected under the former HQS and PBV inspection requirements.                            | Part III. Dwelling Units                             | Updates initial and periodic inspection requirements, housing quality standards, verification methods, alternative inspection provisions, and inspection requirements for PHA-owned units.                                                          | Regulatory Update | PBV Inspection Requirements      | HUD Required                 | Coordinates with Chapter 8's inspection policies.                                                                           |
| 17-006                                | Part IV. Rehabilitated and Newly Constructed Units   | An AHAP was generally required before development activity and HAP execution.                             | Part IV. Rehabilitated and Newly Constructed Units   | Adds revised options for development before or after HAP execution, owner evidence of completion, timing of inspections, completion deadlines, and treatment of development activity that remains incomplete.                                       | Regulatory Update | PBV Development Activity         | HUD Required                 | Implements the revised HOTMA PBV development framework.                                                                     |
| 17-007                                | Part V. PBV HAP Contracts                            | PBV HAP contract amendments and unit substitutions followed the prior Part 983 rules.                     | Part V. HAP Contracts                                | Expands policies governing HAP execution, term, extensions, adding or substituting units, rehabilitation after HAP execution, and owner noncompliance.                                                                                              | Regulatory Update | PBV HAP Contracts                | HUD Required                 | Consolidates related HAP-contract changes.                                                                                  |
| 17-008                                | 17-VI. PBV Waiting Lists                             | Fresno Housing used project-based waiting lists under existing PBV policies.                              | 17-VI. Organization of the Waiting List              | Establishes separate site-based interest and waiting lists for PBV properties. Selected applicants remain in selected status until invited to complete the full application process. Fresno Housing will not permit owner-maintained waiting lists. | Policy Revision   | PBV Site-Based Waiting Lists     | Fresno Housing Discretionary | Property information and preferences are maintained in the applicable plan appendix.                                        |
| 17-009                                | 17-VI. PBV Preferences and Referrals                 | PBV preferences generally followed local HCV preferences and property requirements.                       | 17-VI. Waiting List Preferences and Referrals        | Clarifies preferences for eligible in-place families, elderly families, supportive-service units, and persons needing accessible units. Adds owner-referral and limited-preference referral processes.                                              | Policy Revision   | PBV Preferences and Referrals    | Fresno Housing Discretionary | Targeted preferences may be governed by a property management plan or MOU.                                                  |
| 17-010                                | No Previous Consolidated Section                     | Non-RAD PBV units connected to public housing repositioning were governed through scattered HUD guidance. | RAD Requirements Applicable to Non-RAD PBV Units     | Adds a consolidated explanation identifying when legacy non-RAD PBV and TPV units must follow RAD alternative requirements in Chapter 18.                                                                                                           | New Section       | Legacy Non-RAD PBV Requirements  | HUD Required                 | Addresses right to return, waiting lists, rent phase-ins, resident rights, utility allowances, and related RAD protections. |
| 17-011                                | 17-I.F PHA Owned Units                               | Not previously listed                                                                                     | 17-I.F PHA Owned Units                               | Inserted the names of the indepenndent entities FH uses for rent reasonableness valuations, OCAF reviews, HQS/NSPIRE inspections, other PHA owned independent entity services                                                                       | Regulatory Update | Third Party                      | HUD Required                 | Lists names of the independent entities utilized                                                                            |
| CHAPTER 18-RAD PROJECT BASED VOUCHERS |                                                      |                                                                                                           |                                                      |                                                                                                                                                                                                                                                     |                   |                                  |                              |                                                                                                                             |
| 18-001                                | 18-I.A. RAD Program Overview                         | RAD PBV and RAD/Section 18 blends were governed under earlier RAD guidance.                               | 18-I.A. RAD Program Overview                         | Updates treatment of RAD/Section 18 blends occurring after December 31, 2024. Converted RAD and TPV assistance is placed under one RAD PBV HAP contract and one RAD Use Agreement.                                                                  | Regulatory Update | RAD/Section 18 Blends            | HUD Required                 | Earlier conversions may remain subject to Chapter 17 requirements where applicable.                                         |
| 18-002                                | 18-I.B. Applicable Regulations                       | RAD requirements were based on prior versions of Notice PIH 2019-23.                                      | 18-I.B. Applicable Regulations                       | Updates the governing authority to Notice PIH 2019-23, REV-4, including Supplemental Notices 4B and 4C, and explains when these requirements apply to legacy non-RAD PBV units.                                                                     | Regulatory Update | RAD Regulatory Authority         | HUD Required                 | Updates citations and substantive applicability requirements.                                                               |
| 18-003                                | 18.II.C PHA-Owned Units                              | Not previously listed                                                                                     | 18.II.C PHA-Owned Units                              | Inserted the names of the indepenndent entities FH uses for rent reasonableness valuations, OCAF reviews, HQS/NSPIRE inspections, other PHA owned independent entity services                                                                       | Regulatory Update | Third Party                      | HUD Required                 | Lists names of the independent entities utilized                                                                            |
| 18-004                                | 18-V.D. RAD PBV Waiting Lists                        | RAD PBV waiting lists were managed under earlier project-based waiting-list rules.                        | 18-V.D. Organization of the Waiting List             | Establishes separate project- or building-specific waiting lists for RAD PBV properties and preserves original application dates when applicants are transferred to another qualifying waiting list.                                                | Policy Revision   | RAD PBV Waiting Lists            | Fresno Housing Discretionary | Lists must be maintained in compliance with fair housing requirements.                                                      |

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| 18-005                                     | 18-V. Selection of Participants                                                         | Applicant eligibility and selection generally followed the standard PBV framework.                                                                                                                                                                              | 18-V. Selection of Participants                                                         | Clarifies treatment of in-place families, right-to-return families, income targeting, accessible-unit preferences, transferred applicants, and legacy non-RAD PBV residents.                                                 | Regulatory Update           | RAD Participant Selection                     | HUD Required                 | In-place families receive protections that do not apply to regular new admissions.                                     |
| 18-006                                     | 18-VI. Resident Rights                                                                  | RAD resident procedural rights were addressed under earlier HUD guidance.                                                                                                                                                                                       | 18-VI.G.–18-VI.H. Procedural Rights and Hearings                                        | Updates lease-termination notice requirements and expands informal hearing rights for disputes involving an owner or contract administrator that adversely affect a resident’s rights, status, welfare, or obligations.      | Regulatory Update           | RAD Resident Procedural Rights                | HUD Required                 | The owner must provide an opportunity for an informal hearing before eviction.                                         |
| <b>CHAPTER 19-SPECIAL PURPOSE VOUCHERS</b> |                                                                                         |                                                                                                                                                                                                                                                                 |                                                                                         |                                                                                                                                                                                                                              |                             |                                               |                              |                                                                                                                        |
| 19-001                                     | Chapter Introduction                                                                    | Fresno Housing administered FUP, FYI, VASH, Mainstream, and NED vouchers.                                                                                                                                                                                       | Chapter Introduction                                                                    | Adds Stability Vouchers as a special-purpose voucher program described in the chapter, while Fresno Housing’s list of currently administered voucher types remains separately identified.                                    | Regulatory Update           | Special Purpose Voucher Programs              | HUD Required                 | Chapter now contains six program parts.                                                                                |
| 19-002                                     | 19-I. Family Unification Program                                                        | FUP was administered under earlier FUP guidance and referral requirements.                                                                                                                                                                                      | 19-I. Family Unification Program                                                        | Updates FUP family and youth requirements under Notice PIH 2025-08, including eligibility, referrals, supportive services, waivers, alternative requirements, assistance extensions, and termination at the statutory limit. | Regulatory Update           | FUP Program Requirements                      | HUD Required                 | Youth may leave foster care within 180 days rather than the former 90-day period.                                      |
| 19-003                                     | 19-I.A. Assignment of FUP Vouchers                                                      | FUP vouchers could be allocated between families and youth under local procedures.                                                                                                                                                                              | 19-I.A. Assigning Vouchers                                                              | Establishes that Fresno Housing will not reserve a specific number or percentage of FUP vouchers for families or youth. Eligible referrals will be served up to the FUP allocation.                                          | Policy Revision             | FUP Voucher Allocation                        | Fresno Housing Discretionary | Allows the available allocation to serve either eligible population.                                                   |
| 19-004                                     | 19-I.B. Public Child Welfare Agency                                                     | Fresno Housing operated FUP through its existing partnership agreement.                                                                                                                                                                                         | 19-I.B. Public Child Welfare Agency                                                     | Identifies Fresno County Department of Social Services as the partnering PCWA and states that supportive services will be offered to FUP youth for 36 months.                                                                | Policy Revision             | FUP Partnership and Services                  | Fresno Housing Discretionary | The MOU governs referrals and service responsibilities.                                                                |
| 19-005                                     | 19-I. FUP Youth Time Limits                                                             | FUP youth assistance was time-limited under previous statutory and HUD requirements.                                                                                                                                                                            | 19-I. FUP Youth Extensions and Termination                                              | Updates the process for extending assistance from 36 to 48 or 60 months when statutory conditions are met and clarifies certification, annual review, hearing, and termination requirements.                                 | Regulatory Update           | FUP Youth Assistance Extensions               | HUD Required                 | Failure to meet an extension condition does not permit early termination before the current assistance period ends.    |
| 19-006                                     | 19-I. FUP Youth Waiting List Preference                                                 | The plan did not clearly state whether former FUP youth received an HCV waiting-list preference at expiration.                                                                                                                                                  | 19-I. FUP Termination and Continued Housing                                             | Establishes that Fresno Housing will not provide a general HCV waiting-list preference to FUP youth whose assistance ends because of the statutory time limit.                                                               | New Policy                  | FUP Youth Waiting List Preference             | Fresno Housing Discretionary | A youth may still qualify for a FUP family voucher if referred as an eligible family.                                  |
| 19-007                                     | 19-II. Foster Youth to Independence                                                     | FYI vouchers were administered under earlier FYI notices.                                                                                                                                                                                                       | 19-II. Foster Youth to Independence                                                     | Updates FYI referral, eligibility, supportive services, assistance extensions, waiting-list administration, and project-basing requirements under Notice PIH 2025-08.                                                        | Regulatory Update           | FYI Program Requirements                      | HUD Required                 | Aligns FYI rules with updated FUP youth requirements.                                                                  |
| 19-008                                     | 19-III. HUD-VASH                                                                        | VASH was administered under earlier VASH operating requirements.                                                                                                                                                                                                | 19-III. HUD-VASH                                                                        | Updates VASH requirements under the August 13, 2024 Federal Register notice, including referrals, eligibility, case management, portability, project-basing, and termination.                                                | Regulatory Update           | HUD-VASH Program Requirements                 | HUD Required                 | Comprehensive update to the VASH section.                                                                              |
| 19-009                                     | 19-III.E. VASH Leasing                                                                  | VASH voucher terms and leasing generally followed prior VASH policies.                                                                                                                                                                                          | 19-III.E. VASH Leasing                                                                  | Establishes a minimum 120-calendar-day voucher term for initial leasing and moves; permits qualifying special housing types and leases shorter than 12 months; and permits certain VA-campus housing.                        | Regulatory Update           | VASH Leasing Flexibilities                    | HUD Required                 | Fresno Housing adopts a 120-day initial voucher term.                                                                  |
| 19-010                                     | 19-III.E. VASH Exception Payment Standards                                              | VASH exception payment standards were governed by prior waiver and reasonable-accommodation rules.                                                                                                                                                              | 19-III.E. Exception Payment Standards                                                   | Adds authority for VASH payment standards up to 120 percent of FMR or SAFMR, up to 140 percent as a reasonable accommodation, and higher amounts with HUD approval.                                                          | Regulatory Update           | VASH Exception Payment Standards              | HUD Required                 | Coordinates with Chapter 16.                                                                                           |
| 19-011                                     | 19-VI. Stability Vouchers                                                               | No Stability Voucher section was included.                                                                                                                                                                                                                      | Part VI. Stability Voucher Program                                                      | Adds Stability Voucher policies covering referrals, waiting-list waivers, eligibility, briefings, payment standards, portability, project-basing, and program administration.                                                | New Section                 | Stability Voucher Program                     | HUD Required                 | Adds a complete new special-purpose voucher program section.                                                           |
| 19-012                                     | No Previous Stability Voucher Policy                                                    | No local Stability Voucher payment-standard decision existed.                                                                                                                                                                                                   | 19-VI.G. Stability Voucher Payment Standards                                            | Establishes that Fresno Housing will use the same payment standards for Stability Vouchers as for regular HCVs and will not adopt an alternative timing policy for payment-standard increases.                               | New Policy                  | Stability Voucher Payment Standards           | Fresno Housing Discretionary | Declines HUD’s optional higher Stability Voucher payment standards.                                                    |
| 19-013                                     | 19-VI.E Family eligibility - Social Security Number and Citizenship Status Verification | Policy on SSN                                                                                                                                                                                                                                                   | 19-VI.E Family eligibility - Social Security Number and Citizenship Status Verification | Language removed per Notice PIH 2026-05                                                                                                                                                                                      | Policy Revision             | Stability Voucher                             | HUD Required                 |                                                                                                                        |
| <b>REMOVED PRE HOTMA CHAPTERS</b>          |                                                                                         |                                                                                                                                                                                                                                                                 |                                                                                         |                                                                                                                                                                                                                              |                             |                                               |                              |                                                                                                                        |
| 06A-001                                    | Chapter 6.A. Income and Subsidy Determinations                                          | Chapter 6.A. contained the pre-HOTMA policies for calculating annual income, adjusted income, family share, and PHA subsidy. It applied only before Fresno Housing’s HOTMA Sections 102 and 104 compliance date.                                                | Chapter 6.B. Income and Subsidy Determinations Under HOTMA 102/104                      | Chapter 6.A. is removed from the 2027 Administrative Plan. Income, asset, deduction, family-share, and subsidy determinations are now governed by Chapter 6.B. under the HOTMA Sections 102 and 104 requirements.            | Removed – Obsolete Guidance | Pre-HOTMA Income and Subsidy Chapter Replaced | HUD Required                 | Chapter 6.A. stated that it applied only before the HOTMA compliance date and that Chapter 6.B. would apply afterward. |
| 07A-001                                    | Chapter 7.A. Verification                                                               | Chapter 7.A. contained the pre-HOTMA verification policies, including the former verification hierarchy, EIV procedures, income and asset verification, and deduction verification requirements. It applied only before Fresno Housing’s HOTMA compliance date. | Chapter 7.B. Verification Under HOTMA 102/104                                           | Chapter 7.A. is removed from the 2027 Administrative Plan. Verification of income, assets, deductions, family information, and consent requirements is now governed by Chapter 7.B. under HOTMA and Notice PIH 2023-27.      | Removed – Obsolete Guidance | Pre-HOTMA Verification Chapter Replaced       | HUD Required                 | Chapter 7.A. expressly stated that Chapter 7.B. would apply upon the PHA’s HOTMA compliance date.                      |

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| 11A-001 | Chapter 11.A. Reexaminations | Chapter 11.A. contained the pre-HOTMA policies for annual and interim reexaminations, effective dates, income changes, family-composition changes, and recalculation of family share and subsidy. | Chapter 11.B. Reexaminations Under HOTMA 102/104 | Chapter 11.A. is removed from the 2027 Administrative Plan. Annual reexaminations, interim reexaminations, non-interim transactions, and subsidy recalculations are now governed by Chapter 11.B. under HOTMA. | Removed – Obsolete Guidance | Pre-HOTMA Reexamination Chapter Replaced | HUD Required | Chapter 11.A. stated that it applied only until the HOTMA compliance date and that Chapter 11.B. would apply afterward. |
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